

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

|                                      |   |                            |
|--------------------------------------|---|----------------------------|
| <b>IN RE:</b>                        | ) |                            |
|                                      | ) |                            |
| <b>PETITION OF TENNESSEE-</b>        | ) |                            |
| <b>AMERICAN WATER COMPANY</b>        | ) | <b>DOCKET NO. 25-00002</b> |
| <b>REGARDING THE 2025 PRODUCTION</b> | ) |                            |
| <b>COSTS AND OTHER PASS-</b>         | ) |                            |
| <b>THROUGHS RIDER</b>                | ) |                            |
|                                      | ) |                            |
|                                      | ) |                            |

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**CONSUMER ADVOCATE’S RESPONSES TO  
COMMISSION STAFF’S FIRST SET OF DISCOVERY REQUESTS**

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The Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), pursuant to Rules 26, 33, and 34 of the Tennessee Rules of Civil Procedure, Tennessee Public Utility Commission (“TPUC” or the “Commission”) Rule 1220-01-02-.11, and the Agreed Procedural Schedule entered by the Hearing Officer in this Docket, hereby submits its responses to the *First Set of Discovery Request of Commission Staff* (“Staff”) filed on April 29, 2025.

**CONSUMER ADVOCATE’S RESPONSES**

**1-1.** Confirm that the Order Setting Rates issued in Docket 24-00032 established a new baseline for PCOP expenses, and that the prospective PCOP Rider surcharge will be filed to collect any over-recovery or under-recovery of baseline PCOP expenses for the period January 1, 2026, through December 31, 2026. Please explain.

**RESPONSE:**

**Confirmed. The Order Setting Rates issued in TPUC Docket No. 24-00032 established a new baseline for PCOP expenses. See Company responses to Consumer Advocate DR Nos. 1-6 and 2-2 for confirmation.**

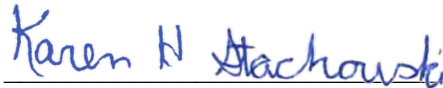
**However, the Consumer Advocate has no control over the content or the timing of PCOP filings. Therefore, we cannot provide a response as to exactly how the Company will structure future filings. Instead, we believe that this question is best left for the Company to address.**

- 1-2.** How do you propose to recover any authorized under-recovery of PCOP expenses through the period ended November 30, 2024? Please explain.

**RESPONSE:**

**Please refer to Table 1 in the Supplemental Testimony of William H. Novak that was filed in this TPUC Docket No. 25-00002 on April 24, 2025. Table 1 calculates a PCOP surcharge rate of 3.02%. This PCOP surcharge rate of 3.02% should be applied to customer bills for the Company to recover their under-recovered PCOP expenses through the historic period ended November 30, 2024.**

RESPECTFULLY SUBMITTED,



KAREN H. STACHOWSKI (BPR No. 019607)

Deputy Attorney General

Office of the Tennessee Attorney General

Consumer Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 741-2350

Fax: (615) 741-1026

Email: [Karen.Stachowski@ag.tn.gov](mailto:Karen.Stachowski@ag.tn.gov)

**TPUC Docket No. 25-00002**

***CA Responds to Staff DR No. 1***

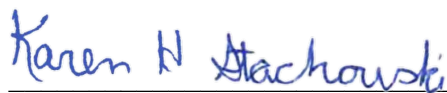
## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via electronic mail provided upon:

Robert C. Lane  
Senior Manager, Rates and Regulatory  
Tennessee-American Water Company  
109 Wiehl Street  
Chattanooga, TN 37403  
Email: [Bob.Lane@amwater.com](mailto:Bob.Lane@amwater.com)

Melvin J. Malone  
Butler Snow LLP  
The Pinnacle at Symphony Place  
150 3rd Avenue South, Suite 1600  
Nashville, TN 37201  
Email: [Melvin.Malone@butlersnow.com](mailto:Melvin.Malone@butlersnow.com)

This the 6<sup>th</sup> day of May, 2025.



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**KAREN H. STACHOWSKI**

Deputy Attorney General