

IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE

IN RE:	)	
	)	
TENNESSEE-AMERICAN WATER	)	
COMPANY'S 2025 INCREMENTAL	)	DOCKET NO. 25-00016
CAPITAL RECOVERY RIDER TARIFF	)	
PETITION	)	
	)	

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CONSUMER ADVOCATE'S SUPPLEMENTAL TO  
FIRST SET OF DISCOVERY REQUESTS  
TO TENNESSEE-AMERICAN WATER COMPANY

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This Supplemental to First Set of Discovery Requests is hereby served upon Tennessee-American Water Company ("TAWC" or the "Company"), pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Regs. 1220-01-02-.11. This one supplemental discovery question was inadvertently left off the filing of the Consumer Advocate's First Set of Discovery Requests filed yesterday with the Commission. The Consumer Advocate Division of the Office of the Tennessee Attorney General ("Consumer Advocate") requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Karen H. Stachowski, at a date and time to be determined by the parties.

**PRELIMINARY MATTERS AND DEFINITIONS**

This Supplemental Discovery Requests incorporates by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate's First Set of Discovery Requests to Tennessee-American Water* sent to the Company on March 18, 2025, and is to be considered

continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

**SUPPLEMENTAL TO FIRST SET OF DISCOVERY REQUESTS**

**1-21.** Provide the calculation and supporting workpapers underlying the adjustment to the return on equity calculation using the Non-Revenue Water methodology, assuming the Commission does not accept the Company's Unaccounted for Water proposal.

**RESPONSE:**

RESPECTFULLY SUBMITTED,



**KAREN H. STACHOWSKI** (BPR No. 019607)

Deputy Attorney General

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TPUC Docket No 25-00016

CA's Supplemental to 1<sup>st</sup> DR to TAWC

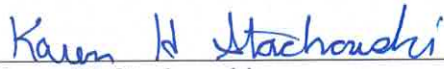
**CERTIFICATE OF SERVICE**

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

Robert C. Lane  
Director, Rates and Regulatory  
Tennessee-American Water Company  
109 Wiehl Street  
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This the 19<sup>th</sup> day of March, 2025.

  
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Karen H. Stachowski  
Deputy Attorney General