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April 15, 2025

VIA ELECTRONIC FILING

Hon. David Jones, Chairman
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

Electronically Filed in TPUC Docket
Room on April 15, 2025 at 3:18 p.m.

RE: *Tennessee-American Water Company's 2025 Incremental Capital Recovery Rider Tariff Petition, Docket No. 25-00016*

Dear Chairman Jones:

Attached for filing please find *Tennessee-American Water Company's Response to Consumer Advocate's Second Set of Discovery Requests* in the above-captioned matter.

Please note that Response No. 2-4 contains **CONFIDENTIAL INFORMATION** and is being submitted **UNDER SEAL** as **CONFIDENTIAL and PROPRIETARY**. Both a public version and a nonpublic, **CONFIDENTIAL** version of this response is attached.

As required, copies will be mailed to your office. Should you have any questions concerning this filing or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

clw

Attachments

cc: Bob Lane, TAWC

Karen H. Stachowski, Consumer Advocate Division

Vance Broemel, Consumer Advocate Division

*Neuhoff Building
1320 Adams Street, Suite 1400
Nashville, TN 37208*

MELVIN J. MALONE
615.651.6705
C 615.948.7801
melvin.malone@butlersnow.com

*T 615.651.6700
F 615.651.6701
www.butlersnow.com*

BUTLER SNOW LLP

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

**TENNESSEE-AMERICAN WATER)
COMPANY’S 2025 INCREMENTAL)
CAPITAL RECOVERY RIDER TARIFF)
PETITION)**

DOCKET NO. 25-00016

**TENNESSEE-AMERICAN WATER COMPANY’S RESPONSE
TO CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS**

Tennessee-American Water Company (“TAWC”), by and through counsel, hereby submits its Response to Second Set of Discovery Requests propounded by the Consumer Advocate Division of the Attorney General’s Office (“Consumer Advocate”).

GENERAL OBJECTIONS

1. TAWC objects to all requests that seek information protected by the attorney-client privilege, the work-product doctrine and/or any other applicable privilege or restriction on disclosure.
2. TAWC objects to the definitions and instructions accompanying the requests to the extent the definitions and instructions contradict, are inconsistent with, or impose any obligations beyond those required by applicable provisions of the Tennessee Rules of Civil Procedure or the rules, regulations, or orders of the Tennessee Public Utility Commission (“TPUC” or “Authority”).
3. The specific responses set forth below are based on information now available to TAWC, and TAWC reserves the right at any time to revise, correct, add to or clarify the objections or responses and supplement the information produced.

4. TAWC objects to each request to the extent that it is unreasonably cumulative or duplicative, speculative, unduly burdensome, irrelevant or seeks information obtainable from some other source that is more convenient, less burdensome or less expensive.

5. TAWC objects to each request to the extent it seeks information outside TAWC's custody or control.

6. TAWC's decision, now or in the future, to provide information or documents notwithstanding the objectionable nature of any of the definitions or instructions, or the requests themselves, should not be construed as: (a) a stipulation that the material is relevant or admissible, (b) a waiver of TAWC's General Objections or the objections asserted in response to specific discovery requests, or (c) an agreement that requests for similar information will be treated in a similar manner.

7. TAWC objects to those requests that seek the identification of "any" or "all" documents or witnesses (or similar language) related to a particular subject matter on the grounds that they are overbroad and unduly burdensome and exceed the scope of permissible discovery.

8. TAWC objects to those requests that constitute a "fishing expedition," seeking information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and is not limited to this matter.

9. TAWC does not waive any previously submitted objections to the Consumer Advocate's discovery requests.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

- 2-1.** Refer to the Direct Testimony of Robert C. Lane at 22:18 – 23:2. He stated that the previously existing depreciation rates adopted in the last rate case were used in the ICRR calculation. However, it appears that the depreciation rates within the Petition, File <Petitioner Exhibit TAWC 2025 Incremental Capital Rider>, Tab “WKP 2024-In-Service Actual” have changed since the last case, resulting in a lower depreciation expense than would have resulted had the rates in the previous filing been used. Respond to the following:
- a. Confirm that the depreciation rates in the current filing are 2025 rates, and not those in effect in 2024?
 - b. If this is confirmed, recalculate the Incremental Capital Rider Revenue Requirement (“ICRR”) to reflect the rates that were in effect for 2024.
 - c. If part (a) is not confirmed, provide support for the depreciation rates used within the current ICRR filing.

Response:

Please see the Company’s response to Consumer Advocate’s First Informal Discovery Requests CAD DR 1-22 filed on May 11, 2025.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

2.2 Refer to the Direct Testimony of William H. Novak at 7:14, Table 3, TPUC Docket No. 25-00002 (April 2, 2025). Notwithstanding the Company's support for the Unaccounted-For-Water Percentage methodology, does the Company agree with the numeric calculation of the Non-Revenue Water Percentage as calculated in Table 3 of Mr. Novak's testimony?¹

RESPONSE: TAWC is still reviewing the testimony of William H. Novack in TPUC Docket No 25-00002. The Company will address this issue, if it disagrees with Mr. Novack numeric calculation of the Non-Revenue Water Percentage as calculated in Table 3 of Mr. Novak's testimony in Rebuttal Testimony in TPUC Docket No. 25-00002?

¹ *Direct Testimony of William H. Novak at 7, TPUC Docket No. 25-00002 (April 2, 2025).*

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

2-3. Refer to the Company's Response to Consumer Advocate DR No. 1-3. Identify the previous TAWC Capital Recovery Rider cases referenced in this response. In addition, provide the supporting calculations demonstrating the adoption of the Unaccounted-for-Water methodology referenced in that response, contrasted with Non-Revenue Water methodology in those same cases.

Response: CAD is mis-reading the Company's Response to DR 1-3. Therefore, the Company hereby clarifies its Response to DR 1-3. In the Commission's Order in TPUC Docket No. 08-00039, the Commission set a policy of excluding some production costs to adjust excess water loss based on a 15% limitation on unaccounted for water. (See Order, TPUC Docket No. 08-00039, pp. 15- 16; and Final Order, TPUC Docket No. 10-00189 p. 37) By applying the 15% unaccounted for water standard established in TPUC Docket Nos. 08-00039 and 10-00189, TAWC does not have excess water loss. Thus, there should not be an adjustment for net book income reflecting an exclusion of costs. The adjustment to net book income to account for zero excess water loss should be zero.

PUBLIC VERSION

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

- 2-4.** Provide the time and amount billed for all attorney(s) who spent time on the Unaccounted-for-Water and Non-Revenue Water portion of the Petition filed in this Docket.

RESPONSE:

The Company objects to this Request on the grounds, and to the extent, that, it asks to invade the attorney-client privilege and the CAD has failed to even allege any relevance of the information to the question in this matter. Subject to and without waiving the foregoing objections, the Company states it does not track the time and is not 'billed' for time spent by in-house counsel. Butler Snow has billed TAWC [REDACTED] to date for its services related to TPUC Docket No. 25-00016.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

2-5. Is it the Company's position that the existing language in its tariff would prohibit a negative ICRR in 2026 if its actual 2025 ICRR capital expenditures are less than those incorporated into the rate base used to establish base rates? Provide a detailed explanation and all supporting documentation.

Response:

The Company objects to this Request on the grounds that the Request requires speculation and conjecture regarding future filings and has no relevance to Docket No. 25-00016. ICRR proceedings are definitionally historical and this question speculates about future filings. See the Company's response to CAD DR Nos. 2-5, 2-7, 2-8 and 2-9; and *Supplement Rebuttal Testimony of Robert C. Lane*, pp. 10-15, TPUC Docket No. 00011 (June 4, 2024). Subject to and without waiving its objections, the Company responds as follows:

The Company states that its Rates, Rules, Regulations and Conditions of Water Service speak for themselves and can be found at https://www.amwater.com/tnaw/resources/pdf/Customer-Service/Your-Water-Rates/TRA_Rates_and_Rules.pdf

The Company, further, notes that the Commission-authorized Tariff functions in a fair and reasonable manner to consider more factors than just historical capital expenditures in determining the ICRR and until the variables are known and measurable it is premature to

hypothesize and speculate on the impact of only the historical capital expenditure component of the calculation.

In Mr. Lane's Rebuttal Testimony in TPUC Docket No. 24-00011, pages 10-15, the Company addresses the going forward concerns expressed by the CAD in CAD DR Nos. 2-5, 2-7, 2-8 and 2-9, as well makes it clear that any future filings will comply with the Commission approved ICRR Tariff.

The Company remains open and available to discuss such issues with the CAD outside of these proceedings and prior to any such future filings.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

2-6. Does the Company believe that its tariff prohibits a negative ICRR under any scenario? If such a hypothetical scenario exists, identify the details and supporting documentation.

RESPONSE:

See the Company's response to CAD DR 2-5. Further, the Company notes the current tariff and the settlement that was approved by the Commission in TPUC Docket No. 19-00103 do not have provisions for negative ICRRR or a refund.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

2-7. Does the Company believe its current tariff provisions, subject to modification in this proceeding, will control the calculation of its 2026 ICRR?

RESPONSE:

The Company objects to this Request on the grounds that the Request requires speculation and conjecture regarding future filings and has no relevance to Docket No. 25-00016. *See also* the Company's response to CAD DR Nos. 2-5 and 2-8; and *Supplement Rebuttal Testimony of Robert C. Lane*, pp. 10-15, TPUC Docket No. 00011 (June 4, 2024). Subject to and without waiving its objections, the Company remains open and available to discuss such issues with the CAD outside of these proceedings and prior to any such future filings.

In Mr. Lane's Rebuttal Testimony in TPUC Docket No. 24-00011, pages 10-15, the Company addresses the going forward concerns expressed by the CAD in CAD DR Nos. 2-5, 2-7, 2-8 and 2-9, as well as affirms that any future filings will comply with the Commission-approved ICRR Tariff.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

2-8. Does the Company believe a “true-up” of its qualifying ICRR investment incorporated into base rates in TPUC Docket No. 24-00032 should be reconciled with its actual 2025 qualifying ICRR expenditures? If not, what is the basis for this conclusion? If so, to the extent budgeted capital expenditures included in Rate Base in TPUC Docket No. 24-00032 exceed the actual costs of such ICRR qualifying projects, how should such differences be treated within its 2026 filing?

RESPONSE:

The Company objects to this Request on the grounds that the Request requires speculation and conjecture regarding future filings and has no relevance to Docket No. 25-00016. ICRR proceedings are definitionally historical and this question speculates about future filings. *See* the Company’s response to CAD DR 2-5; and *Supplement Rebuttal Testimony of Robert C. Lane*, pp. 10-15, TPUC Docket No. 00011 (June 4, 2024). Subject to and without waiving its objections, the Company remains open and available to discuss such issues with the CAD outside of these proceedings and prior to any such future filings.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

- 2-9.** Identify the forecasted level of ICRR, by project (work number) that was included in Rate Base in TPUC Docket No. 24-00032.

RESPONSE:

TAWC objects to this question on the grounds that it is beyond the scope of this proceeding. TPUC Docket No. 25-00016 deals solely with the level of eligible investments made in 2024. Docket No. 25-00016 is not a forecast of the future level of investment in 2025. *See Responses to CAD DR Nos. 2-5 and 2-8. See also Supplement Rebuttal Testimony of Robert C. Lane*, pp. 10-15, TPUC Docket No. 00011 (June 4, 2024). Subject to and without waiving its objections, the Company remains open and available to discuss such issues with the CAD outside of these proceedings and prior to any such future filings.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

2-10. Refer to the Direct Testimony of Robert C. Lane, Petitions Exhibit Proposed First Revised Sheet No. 12-Riders-1. This exhibit includes a legacy capital rider percentage of 36.3%. Confirm that the Company is, in fact, not charging a legacy capital rider surcharge effective with the date new base rates became effective.

RESPONSE:

Confirmed. The Company has not charged a legacy capital rider since January 21, 2025, the effective date of new base rates adopted pursuant to the Commission's deliberations in TPUC Docket No. 24-00032.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

- 2-11.** Refer to the table below comparing Accumulated Depreciation balances from Trial Balances for December 2024 with corresponding information referenced within the Petition, File <Petitioner Exhibit TAWC 2025 ICRRR & ROE Test Calculation>, Tab “2024 ICRR Financials”. Respond to the following:

Componants of Accumulated Depreciation		
Account Number	Account Title	12/31/2024
1080100	A/D UP In Service	\$ (198,341,823)
1080200	AD - Salvage/Scrap	\$ (5,537,602)
1080300	A/D Asset Sale	\$ (9,860)
1080400	A/D Original Cost	\$ 59,792,921
1081000	A/D - Reg Asset	\$ (3,749,579)
	Total	\$ (147,845,943)
	Balance per 2024 ICRRR Financials - 12/24	\$ (118,243,018)

- a. Reconcile the two differing Accumulated Depreciation balance totals shown;
- b. Provide a comprehensive Explanation of the transactions recorded to account 1080400 A/D Original Cost; and
- c. Provide a comprehensive Explanation of the transactions recorded to account 1080400 A/D Regulatory Asset.

RESPONSE:

- a. Please see the below table for a reconciliation of the Accumulated Depreciation balance totals shown.

Account	Account Title	12/31/2024	Notes
10801000	A/D - UP in Service	(\$198,341,823)	
10802000	A/D - Salvage/Scrap	(5,537,602)	
10803000	A/D - Asset Sale	(9,860)	
10804000	A/D - Original Cost	59,792,921	
11430000	UPAA-Neg Post 1/1/06	(3,749,579)	
		(\$147,845,942)	
11430000	UPAA-Neg Post 1/1/06	3,749,579	CAD included in error
10810000	A/D - Reg Asset	(37,285)	
18680000	RA-Cost of Removal	25,234,618	
18680100	RA-COR RWIP	656,013	
Balance per 2024 ICRRR Financials - 12/24		(\$118,243,018)	

- b. Accumulated Depreciation Original costs account #10804000 includes retirements from respective Utility Plant Accounts 101xxxxx.
- c. Accumulated Depreciation Regulatory Asset account #10810000 includes monthly amortization of intangible UPA asset related to adoption of FAS 109.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

2-12. Refer to the Company's Response to the Consumer Advocate's DR No. 1-9, PDF p. 243. Provide a complete explanation supporting the necessity of the Property Tax adjustments to 2023 and 2024 as referenced in the Company's Response.

RESPONSE:

The property tax adjustments to 2023 and 2024 were necessary to true up an over accrual versus the property taxes being paid. The 2023 and 2024 appraisal ratio in Hamilton County decreased to 0.7053 from 1.000 resulting in over accruals for those years 2023 and 2024. According to the state assessor, the rate is expected to go back to 100 for years 2025-27.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Bob Lane

Question:

2-13. Refer to the Company's Response to the Consumer Advocate's DR No. 1-11, PDF p. 471. Provide a complete explanation supporting the 2023 and 2024 true-ups to Franchise Tax Expense as referenced in the Company's response.

RESPONSE:

The franchise tax adjustments to 2023 and 2024 were completed to true up the Company's franchise tax accrual balance for the 2023 actual franchise tax amount per the 2023 tax return and to true up the 2024 accrual balance for the expected franchise tax amount to be paid. As of 2024, Tennessee passed a law repealing the property base component of the Franchise Tax taken on the Tax Return, which is a driver in adjusting these accrual balances.

Pages 471-478 provide the calculations explaining the true-up from projected franchise expense to actuals.

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Jon Sparkman

Question:

2-14. Refer to the Company's Response to Consumer Advocate DR No. 1-13, related to the Company's cast iron and galvanized pipe inventory. The Company has responded that such inventory is subject to changes and revisions each year, and notably, the reported cast iron and galvanized pipe mileage increased from 2023 to 2024. Due to this change in inventory levels, it is impossible to accurately determine each replacement mileage for each type of pipe. Identify the miles of cast iron and galvanized pipe replaced in 2024, by district.

RESPONSE: See the following Table to see the miles of cast iron and galvanized pipe replaced in 2024, by district.

Districts	Miles of CI and GAL Main Replaced 2024
Chattanooga	2.65
Sequatchie Valley	0
Suck Creek	0
Jasper Highlands	0

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Jon Sparkman

Question:

2-15. Refer to the Company's Response to the Consumer Advocate's DR No. 1-14.

The Company explained that galvanized and cast iron main breaks increased by nearly 30% in 2024 compared with 2023. What caused this increase in these types of main breaks, and what steps, if any, is the Company undertaking to minimize such occurrences? Provide supporting documentation for your response.

RESPONSE:

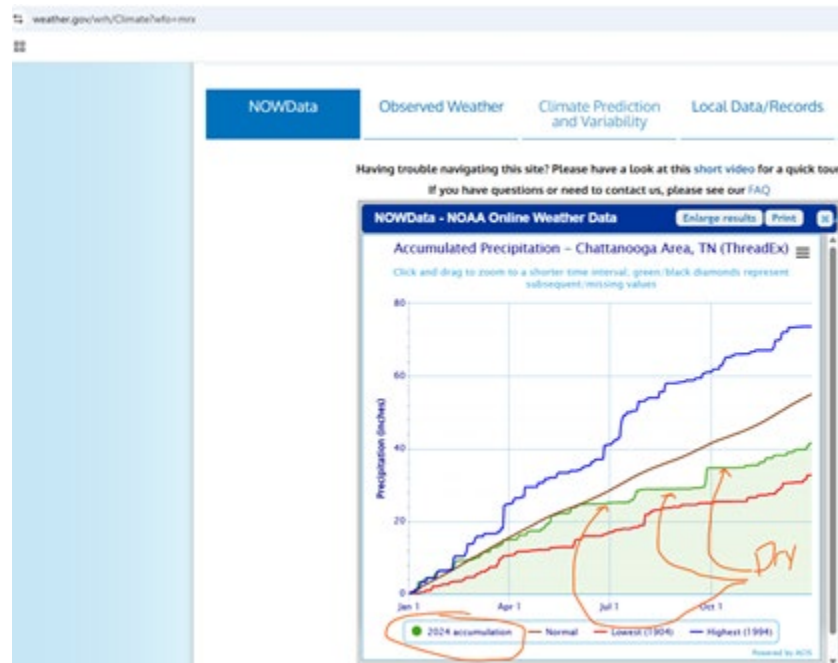
The increase in main breaks can be partially attributed to non-typical weather events in 2024. In January 2024, an extended period of cold weather was observed during which the daily low temperature averaged 15°, ranging from 11° to 21° between January 16, 2024 and January 22, 2024, with three days where the high temperature did not get above 32° during that time period. Chattanooga's normal coldest temperature range is from a low of 32° low to a high of 51° that are typically found in mid-January. As temperatures drop and stay colder for longer, soil can shift and cause unusual stresses on water pipes, which leads to breaks. Although not as extreme as in January 2024, extended colder weather conditions were observed in early December where low temperatures averaged 23.5°, ranging from 22° to 26°, from December 4, 2024 to December 7, 2024. Another factor affecting main breaks in 2024 was the extreme drought during the summer of 2024. Low rainfall was observed throughout the summer. The drought classification for

southeast Tennessee reached a classification level D3 (Extreme Drought) in September 2024. Soil shrinkage in clayey soils typically found in southeast Tennessee can cause unusual stress on pipes and cause main breaks. The steps that TAW is taking to minimize these occurrences is to replace aging galvanized and cast iron water mains.

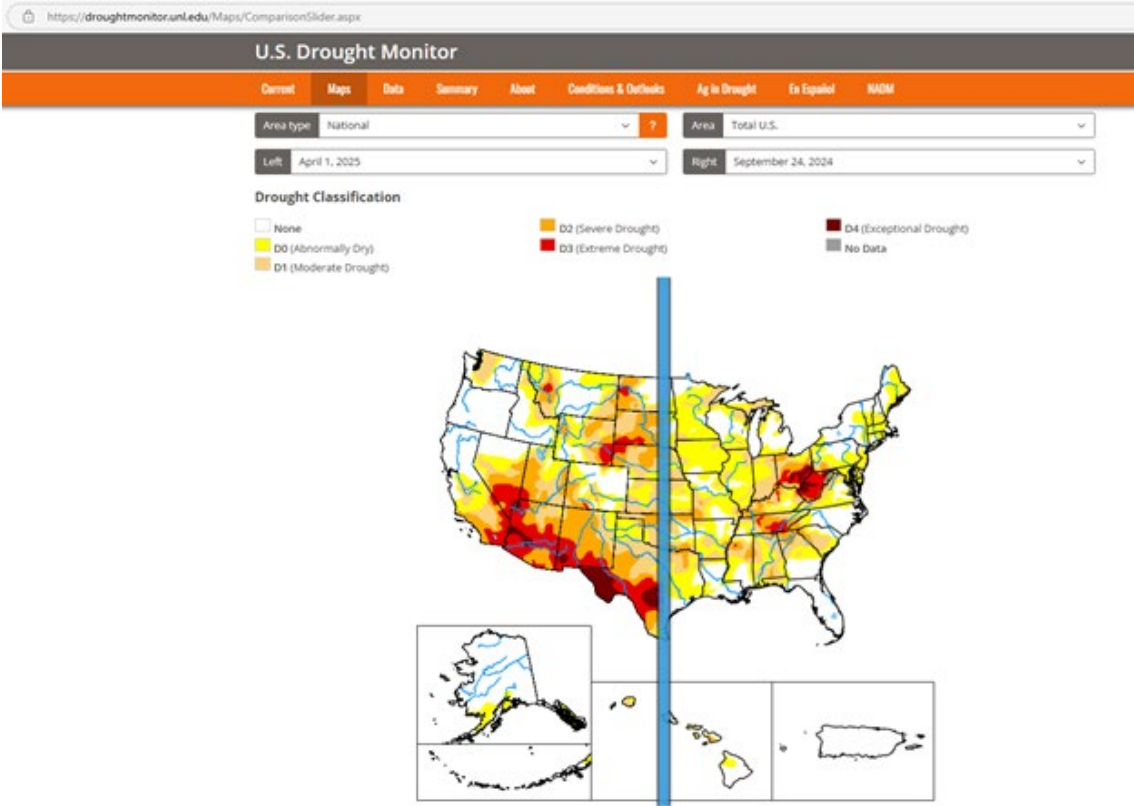
2023 Chattanooga Area Accumulated Precipitation



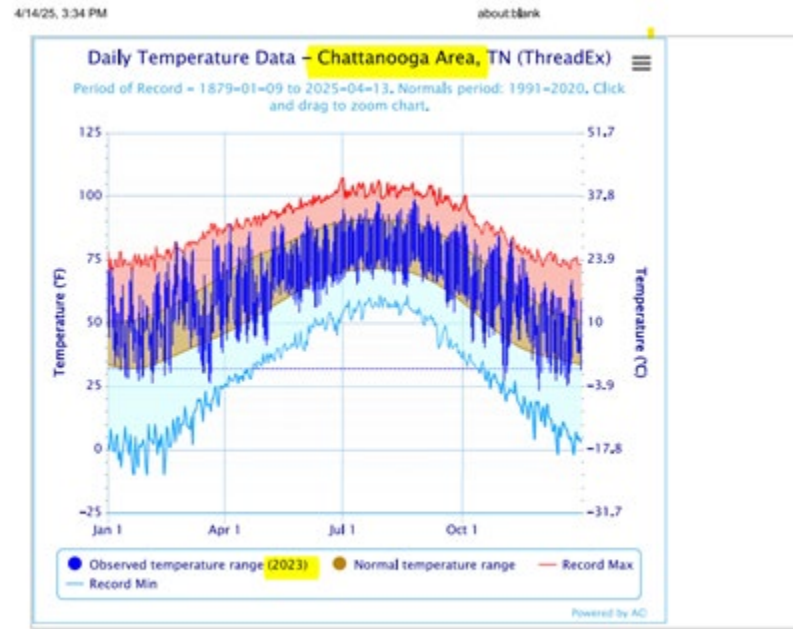
2024 Chattanooga Area Accumulated Precipitation



Comparison Slider | U.S. Drought Monitor



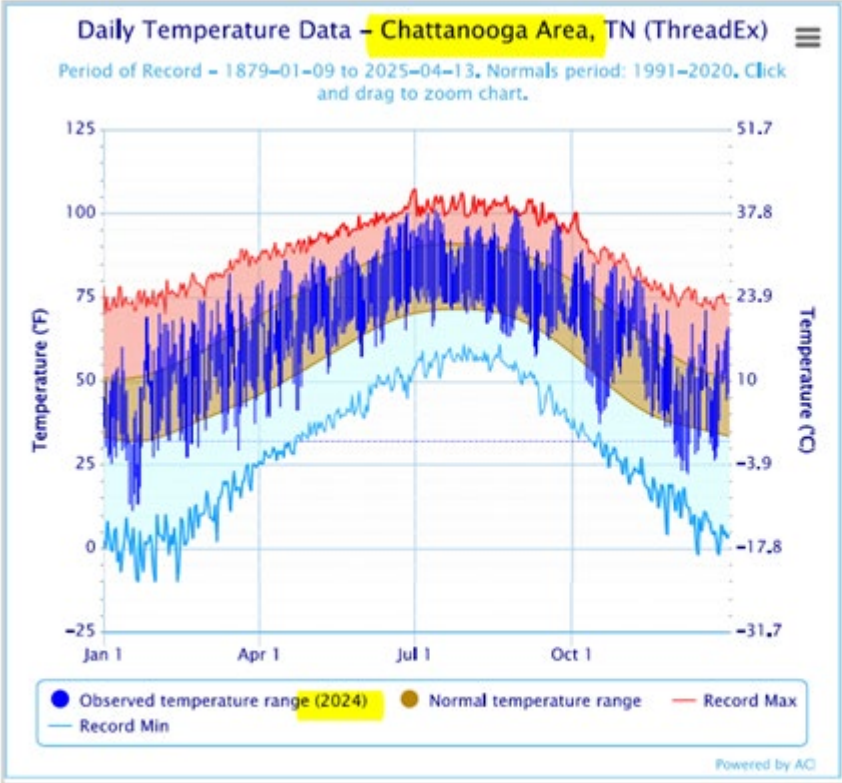
2023 Chattanooga Temperature Data

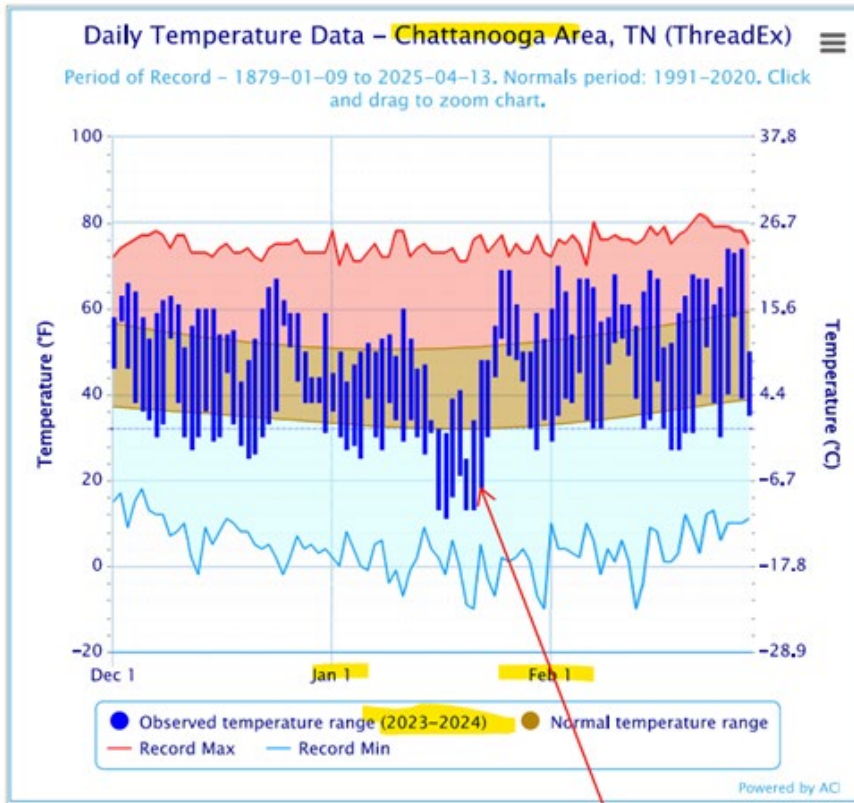


2024 Chattanooga Temperature Data

4/14/25, 3:36 PM

about:blank





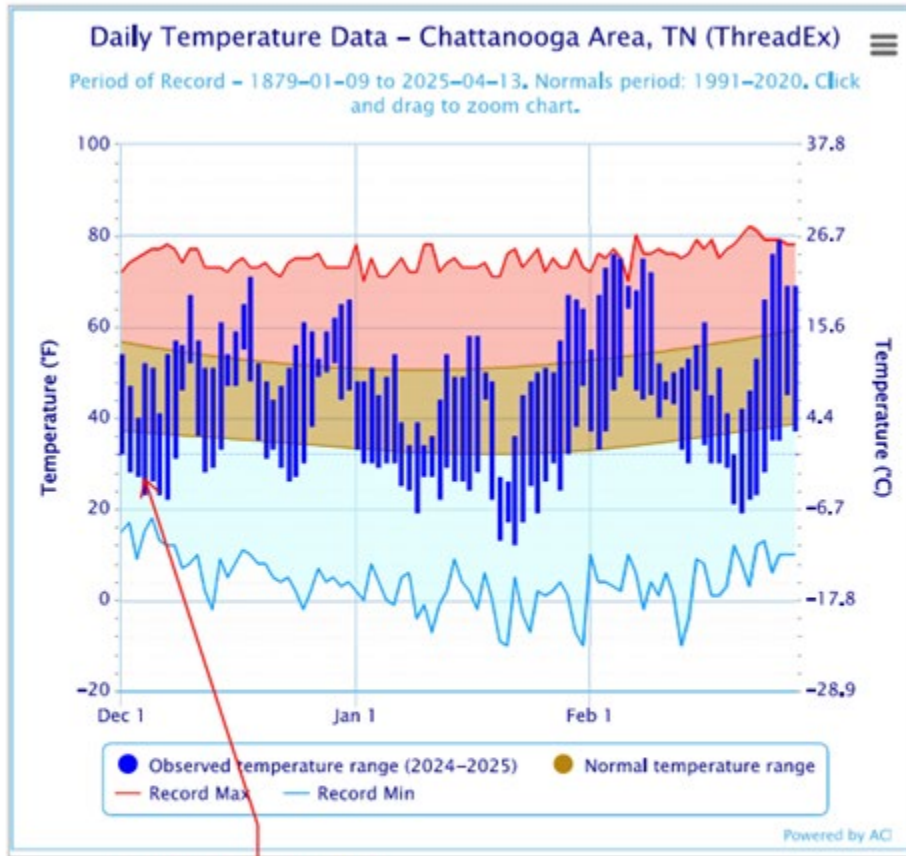
Prolonged cold
weather in January
2024.

Date	Temperature				HDD	CDD	Precipitati on	New Snow	Snow
	Maximu m	Minimu m	Avera ge	Departu re					
1/1/2024	45	36	40.5	-1.6	24	0	0	0	0
1/2/2024	50	30	40	-2	25	0	0	0	0
1/3/2024	43	27	35	-6.9	30	0	0	0	0
1/4/2024	47	28	37.5	-4.3	27	0	0	0	0
1/5/2024	50	25	37.5	-4.2	27	0	0.09	0	0
1/6/2024	52	39	45.5	3.9	19	0	0.22	0	0
1/7/2024	50	30	40	-1.6	25	0	0.01	0	0
1/8/2024	53	27	40	-1.5	25	0	0.14	0	0
1/9/2024	54	38	46	4.5	19	0	2.72	T	0
1/10/2024	49	34	41.5	0.1	23	0	T	T	0
1/11/2024	60	29	44.5	3.1	20	0	0	0	0
1/12/2024	53	34	43.5	2.1	21	0	0.35	0	0
1/13/2024	46	30	38	-3.3	27	0	0	0	0
1/14/2024	47	26	36.5	-4.8	28	0	T	T	0
1/15/2024	34	31	32.5	-8.8	32	0	0.57	2.1	T
1/16/2024	32	13	22.5	-18.8	42	0	0.12	0	T
1/17/2024	31	11	21	-20.4	44	0	0	0	0
1/18/2024	39	16	27.5	-13.9	37	0	0.12	0	0
1/19/2024	41	21	31	-10.4	34	0	0.02	T	0
1/20/2024	25	13	19	-22.5	46	0	T	T	0
1/21/2024	34	13	23.5	-18	41	0	0	0	0
1/22/2024	48	18	33	-8.6	32	0	0	0	0
1/23/2024	48	30	39	-2.7	26	0	T	0	0
1/24/2024	56	44	50	8.2	15	0	0.75	0	0
1/25/2024	69	53	61	19.2	4	0	0.69	0	0
1/26/2024	69	49	59	17.1	6	0	0	0	0

1/27/2024	61	48	54.5	12.4	10	0	0.6	0	0
1/28/2024	50	43	46.5	4.3	18	0	T	0	0
1/29/2024	50	32	41	-1.3	24	0	0	0	0
1/30/2024	59	27	43	0.5	22	0	0.07	0	0
1/31/2024	53	34	43.5	0.9	21	0	0	0	0
Sum	1498	929	-	-	794	0	6.47	2.1	-
Average	48.3	30	39.1	-2.6	-	-	-	-	0
Normal	51	32.4	41.7	-	722	0	5.02	1	-

If you have questions or need to contact us, please see our [FAQ](#)

NOWData - NOAA Online Weather Data									
Date	Temperature				HDD	CDD	Precipitation	New Snow	Snow Depth
	Maximum	Minimum	Average	Departure					
2024-12-01	54	32	43.0	-3.8	22	0	0.00	0.0	0
2024-12-02	47	28	37.5	-9.1	27	0	T	T	0
2024-12-03	40	27	33.5	-12.9	31	0	0.00	0.0	0
2024-12-04	52	23	37.5	-8.7	27	0	0.00	0.0	0
2024-12-05	51	26	38.5	-7.5	26	0	0.00	0.0	0
2024-12-06	41	23	32.0	-13.8	33	0	0.00	0.0	0
2024-12-07	54	22	38.0	-7.6	27	0	0.00	0.0	0
2024-12-08	57	31	44.0	-1.5	21	0	0.07	0.0	0
2024-12-09	56	46	51.0	5.7	14	0	0.66	0.0	0
2024-12-10	67	52	59.5	14.4	5	0	0.06	0.0	0
2024-12-11	57	36	46.5	1.6	18	0	T	0.0	0
2024-12-12	51	28	39.5	-5.3	25	0	0.00	0.0	0
2024-12-13	51	29	40.0	-4.6	25	0	0.00	0.0	0
2024-12-14	61	33	47.0	2.6	18	0	T	0.0	0
2024-12-15	54	47	50.5	6.2	14	0	0.39	0.0	0
2024-12-16	59	47	53.0	8.9	12	0	0.13	0.0	0
2024-12-17	65	55	60.0	16.0	5	0	0.24	0.0	0
2024-12-18	71	48	59.5	15.7	5	0	0.08	0.0	0
2024-12-19	52	35	43.5	-0.2	21	0	0.00	0.0	0
2024-12-20	48	31	39.5	-4.0	25	0	T	0.0	0
2024-12-21	44	33	38.5	-4.9	26	0	0.00	0.0	0
2024-12-22	47	29	38.0	-5.2	27	0	0.00	0.0	0
2024-12-23	51	26	38.5	-4.6	26	0	0.00	0.0	0
2024-12-24	56	27	41.5	-1.5	23	0	0.00	0.0	0
2024-12-25	61	30	45.5	2.6	19	0	0.00	0.0	0
2024-12-26	59	38	48.5	5.8	16	0	0.00	0.0	0
2024-12-27	52	40	54.0	8.4	11	0	0.00	0.0	0



Colder than normal in
early December.

Source: <https://www.weather.gov/wrh/Climate?wfo=mrz> //

**TENNESSEE AMERICAN WATER COMPANY
DOCKET NO. 25-00016
SECOND DISCOVERY REQUEST OF THE
CONSUMER ADVOCATE DIVISION**

Responsible Witness: Jon Sparkman

Question:

2-16. Refer to the Company's Response to Consumer Advocate DR No. 1-15.

Provide the Mains replacement mileage that was at least 50 years old by District.

RESPONSE:

Districts	Miles of CI and GAL Main Replaced 2024 Older Than 50 years
Chattanooga	2.31
Sequatchie Valley	0
Suck Creek	0
Jasper Highlands	0

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

**TENNESSEE-AMERICAN WATER)
COMPANY'S 2025 INCREMENTAL)
CAPITAL RECOVERY RIDER TARIFF)
PETITION)**


DOCKET NO. 25-00016

VERIFICATION

STATE OF Tennessee)

COUNTY OF Hamilton)

I, ROBERT C. LANE, being duly sworn, state that I am authorized to testify on behalf of Tennessee-American Water Company in the above-referenced docket, that if present before the Commission and duly sworn, verifies that the data requests and discovery responses are accurate to the best of my knowledge.



ROBERT C. LANE

Sworn to and subscribed before me
this 15th day of April, 2025.



Notary Public

My Commission expires: 2/28/28



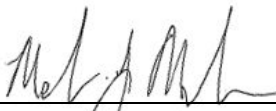
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Vance L. Broemel, Esq.
Senior Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Vance.Broemel@ag.tn.gov

Karen H. Stachowski, Esq.
Deputy Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Karen.Stachowski@ag.tn.gov

This the 15th day of April 2025.



Melvin Malone