

**TENNESSEE WATER SERVICE, INC.**  
**DOCKET NO. 25-00031**  
**FIRST DISCOVERY REQUEST OF THE CONSUMER ADVOCATE**

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

<b>IN RE:</b>	)	Electronically Filed in TPUC Docket Room on July 15, 2025 at 12:44 p.m.
	)	
<b>TENNESSEE WATER SERVICE, INC.</b>	)	
<b>PETITION FOR APPROVAL OF ITS</b>	)	<b>DOCKET NO. 25-00031</b>
<b>2025 ANNUAL RATE REVIEW FILING</b>	)	
<b>PURSUANT TO TENN. CODE ANN. § 65-</b>	)	
<b>5-103(d)(6)</b>	)	

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**TENNESSEE WATER SERVICE, INC.’S RESPONSES TO CONSUMER ADVOCATE’S  
FIRST SET OF DISCOVERY REQUESTS**

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Tennessee Water Service, Inc. (“TWS” or the “Company”), by and through counsel, hereby submits its Responses to the First Set of Discovery Requests propounded by the Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”).

**GENERAL OBJECTIONS**

1. TWS 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. TWS 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 “Commission”).

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3. The specific responses set forth below are based on information now available to TWS, and TWS reserves the right at any time to revise, correct, add to or clarify the objections or responses and supplement the information produced.

4. TWS 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. TWS objects to each request to the extent it seeks information outside TWS' custody or control.

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

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**RESPONSIBLE WITNESS: Andrew Dickson, Vice President of Finance, TWS**

**1-1.** Refer to this Petition’s File <CONFIDENTIAL TWS ARM 2025-Attrition Period Revenues Sch B-1 and B-2.xlsx>, Tab “Summary” and TPUC Docket No. 24-00028, the Company’s Response to CA DR 1-8, File <CA 1-8 CONFIDENTIAL TWS ARM – Attrition Period Revenues.xlsx>, Tab “Summary”. Compare the two documents and respond to the following:

- a. The customer count (bills) for [REDACTED], at [REDACTED], while the [REDACTED] customer count (bills) was identified [REDACTED]. Confirm that the customer count for TWS [REDACTED]. If this is not accurate, please provide corrected data; and
- b. The [REDACTED] billed usage was [REDACTED] as summed on Excel rows 15 – 18, compared with [REDACTED] usage of [REDACTED]. Provide a comprehensive explanation to support the [REDACTED]

**RESPONSE:**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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TWS has reproduced the document “CONFIDENTIAL TWS ARM 2025-Attrition Period Revenues Sch B-1 and B-2.xlsx” in the attachment, “CA DR 1-1 - CONFIDENTIAL TWS ARM 2025-Attrition Period Revenues Sch B-1 and B-2.xlsx”, and thus has the following responses to parts (a) and (b):

[illegible]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

TWS asks that the attachment “CA DR 1-1 - CONFIDENTIAL TWS ARM 2025-Attrition Period Revenues Sch B-1 and B-2.xlsx” retain the same confidential treatment afforded to the original version of the attachment.

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**1-2.** Provide a copy of the latest Tennessee State Excise (Income) tax return submitted by Tennessee Water Service.

**RESPONSE:**

Please refer to the attachment, “CA DR 1-2 - 2023 TN Form FAE 170 TWS\_Final CONFIDENTIAL.pdf” for the 2023 tax return, which is marked confidential treatment due to the sensitive financial and tax data contained therein.

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**1-3.** Refer to Petition's File <ARM Filing Template 2025.xlsx>, Tab "Fusion TB Drop", Cell AA2. Provide all support for the CPI factor of 5.6%.

**RESPONSE:**

Please refer to attachment "CA DR 1-3 - Consumer Price Index News Release – 2024 M12 Results.pdf", which supports the CPI factor of 5.6% used in the tab "Fusion TB Drop" cell AA2. This inflation factor is based on the U.S Bureau of Labor Statistics Economic News release for the annual inflation rate in 2024 for Water and Sewerage Maintenance. In attachment 1-3, the rate used by TWS is reflected on page 16 in the Dec. 2024 column. The U.S. Bureau of Labor Statistics website address used to find this CPI factor is [https://www.bls.gov/news.release/archives/cpi\\_01152025.htm](https://www.bls.gov/news.release/archives/cpi_01152025.htm).

**RESPONSE:**



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RESPECTFULLY SUBMITTED,



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**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:

Shilina B. Brown  
Vance L. Broemel  
**Office of the Tennessee Attorney General**  
**Consumer Advocate Division**  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
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Email: [Vance.Broemel@ag.tn.gov](mailto:Vance.Broemel@ag.tn.gov)

This the 15th day of July, 2025.



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Ryan Freeman