IN THE TENNESSEE PUBLIC UTILITY COMMISSION AT NASHVILLE, TENNESSEE

IN RE:)	
)	
TENNESSEE WATER SERVICE, INC.)	
PETITION FOR APPROVAL OF ITS)	
2025 ANNUAL RATE REVIEW FILING)	DOCKET NO. 25-00031
PURSUANT TO TENN. CODE ANN. §)	
65-5-103(d)(6))	

CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS TO TENNESSEE WATER SERVICES, INC

This Second Set of Discovery Requests is hereby served upon Tennessee Water Service, Inc., ("TWS"), pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Regs. 1220-01-02-.11. The Consumer Advocate Division of the Office of the 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 Shilina B. Brown on or before Monday, July 28, 2025, at 2:00 p.m. CST.

PRELIMINARY MATTERS AND DEFINITIONS

This Second Set of Discovery Requests incorporates by reference the same Preliminary Matters and Definitions as set forth in the Consumer Advocate's First Set of Discovery Request to TWS filed July 1, 2025, are 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.

SECOND SET OF DISCOVERY REQUESTS

2-1. Identify any planned capital expenditures currently included within the corporate capital budget for the period 2025 – 2027. For each planned capital expenditure, identify the anticipated cost and an explanation of the need for the project.

RESPONSE:

RESPECTFULLY SUBMITTED,

SHILINA B. BROWN (BPR No. 020689)

Undirach Brown

Senior Assistant Attorney General

VANCE L. BROEMEL (BPR No. 011421)

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CERTIFICATE OF SERVICE

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

upon:

Ryan A. Freeman, Esq. Baker, Donelson, Bearman Caldwell & Berkowitz, PC Suite 1900 Republic Centre 633 Chestnut Street Chattanooga, TN 37450

Email: rfreeman@bakerdonelson.com

Andrew Dickson VP, Finance Tennessee Water Service, Inc. 500 W. Monroe Street, Suite 3600 Chicago, IL 60661-3779

Email: andrew.dickson@uiwater.com

This the 21st day of July, 2025.

SHILINA B. BROWN

Senior Assistant Attorney General

Willia B. Brown