

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

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:)	Electronically Filed in TPUC Docket Room on July 28, 2025 at 10:40 a.m.
)	
TENNESSEE WATER SERVICE, INC.)	
PETITION FOR APPROVAL OF ITS)	DOCKET NO. 25-00031
2025 ANNUAL RATE REVIEW FILING)	
PURSUANT TO TENN. CODE ANN. § 65-)	
5-103(d)(6))	

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

Tennessee Water Service, Inc. (“TWS” or the “Company”), by and through counsel, hereby submits its Responses to the Second 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

- 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: Please see attached capital plan for 2025-2027.

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RESPECTFULLY SUBMITTED,



Ryan A. Freeman (BPR 033299)
**Baker, Donelson, Bearman, Caldwell &
Berkowitz, PC**
1900 Republic Centre
633 Chestnut Street
Chattanooga, TN 37450-1800
Direct: 423.209.4181
Email: rfreeman@bakerdonelson.com

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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
Phone: (615) 360-4219
Fax: (615) 741-8151
Email: Shilina.Brown@ag.tn.gov
Email: Vance.Broemel@ag.tn.gov

This the 28th day of July, 2025.



Ryan Freeman

DETAIL Project List (natural dollars)

Project Type	State/ Province	Estimated In Service Date	Project Name	Current Forecast				Explanation
				Total Project Forecast	2025	2026	2027	
Replace	TN	Various	G/L Spending	234,504	76,385	77,160	80,959	Encompasses routine, high volume, low cost replacement and rehab work on fixed assets, such as pumps, valves, hydrants, meters, and service lines.
Replace	TN	12/31/2025	TN - PRV Replacement	40,000	40,000	-	-	Required to replace critical assets that are near the end of their useful life. These valves are necessary to maintain proper pressure in lower elevations in order to protect appliances and property of our consumers.
				274,504	116,385	77,160	80,959	