

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

IN RE:)	
)	
JOINT PETITION OF TENNESSEE-)	
AMERICAN WATER COMPANY,)	
AMERICAN WATER WORKS)	
COMPANY, INC., NEXUS REGULATED)	DOCKET NO. 25-00040
UTILITIES, LLC, AND TENNESSEE)	
WATER SERVICE, INC. FOR)	
AUTHORIZATION OF CHANGE OF)	
CONTROL, APPROVAL OF THE)	
AGREEMENT AND PLAN OF)	
MERGER AND FOR THE ISSUANCE)	
OF A CERTIFICATE OF)	
CONVENIENCE AND NECESSITY)	

**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS
TO TENNESSEE WATER SERVICE, INC.
AND NEXUS REGULATED UTILITIES, LLC**

This Second Set of Discovery Requests is hereby served upon Tennessee Water Service, Inc. (“TWS”) and Nexus Regulated Utilities, LLC (“Nexus”) hereinafter collectively referred to as (“Sellers” or “Company”), pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Advocate Division of the Tennessee 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 Friday, September 5, 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 Discovery Requests sent to the Sellers on July 25, 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.

REPSONSE:

- 2-2.** Refer to the Company's Response to Consumer Advocate DR No. 1-1(c), that indicated the transaction will be taxable to TWS and identify the estimated gain on the sale based upon December 31, 2024, data. Provide the estimated journal entry to be recorded because of the transaction.

REPSONSE:

- 2-3.** Refer to the Company's Response to Consumer Advocate DR No. 1-1, regarding the elimination of Accumulated Deferred Income Taxes ("ADIT") because of this transaction. Explain how ratepayers of TWS will not be adversely affected by this transaction considering the \$132,658 increase in rate base that results from this transaction.

RESPONSE:

2-4. Provide the rationale supporting the Company's intent to retain the gain on the sale resulting from this transaction in light of the Commission's decisions regarding the assignment of extraordinary costs between ratepayers and shareholders in TPUC Docket Nos. 17-00108 and 19-00028.

RESPONSE:

RESPECTFULLY SUBMITTED,



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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:

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This the 22nd day of August, 2025.



SHILINA B. BROWN

Senior Assistant Attorney General