

TENNESSEE WATER SERVICE, INC.

DOCKET NO. 25-00040

REBUTTAL TESTIMONY

OF

TIFFANY VAN HORN

ON

**JOINT PETITION OF TENNESSEE-AMERICAN WATER COMPANY, AMERICAN
WATER WORKS COMPANY, INC., NEXUS REGULATED UTILITIES, LLC, AND
TENNESSEE WATER SERVICE, INC. FOR AUTHORIZATION OF CHANGE OF
CONTROL, APPROVAL OF AGREEMENT AND PLAN OF MERGER AND FOR
ISSUANCE OF A CERTIFICATE OF CONVENIENCE AND NECESSITY**

1 **Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.**

2 A. My name is Tiffany Van Horn. I am the President of Tennessee Water Service, Inc.
3 ("TWS" or "Company"), a subsidiary of Nexus Regulated Utilities, LLC. ("Nexus"). My
4 business address is #2 N. Wolfscratch Drive, Jasper, GA 30143.

5

6 **Q. DID YOU PREVIOUSLY SUBMIT DIRECT TESTIMONY ON BEHALF OF TWS**
7 **IN THIS PROCEEDING?**

8 A. Yes.

9

10 **Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?**

11 A. No.

12

13 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

14 A. The purpose of my testimony is to continue to support the acquisition of TWS by American
15 Water Works Company, Inc. ("AWWC" or "American Water") and its merger with and
16 into TAWC (the "Transaction"). I also respond to the Consumer Advocate Division in the
17 Office of the Tennessee Attorney General's ("Consumer Advocate" or "CAD") suggestion
18 that the transaction is not in the public interest. The fact that I may not have responded to
19 any particular argument or statement made should not be interpreted as my agreement with
20 the argument or statement.

21

1 **Q. IS THE TRANSACTION IN THE PUBLIC INTEREST?**

2 A. Yes. I believe that this acquisition is in the best interests of TWS customers, and I believe
3 that TAWC will continue to provide the high level of customer service that TWS has
4 established and that our customers have come to expect.

6 **Q. PLEASE EXPLAIN WHY THE TRANSACTION IS IN THE PUBLIC INTEREST.**

7 A. As Nexus seek to exit operations in Tennessee to focus its operations in other jurisdictions,
8 the Transaction ensures continuity of safe, reliable service for TWS's customers and, as
9 stated by Mr. Stout, it is in the public interest for a stable, financially strong, and
10 experienced operator like TAWC to assume responsibility for and provide TWS's current
11 and future customers with safe and reliable service.¹ By joining the established presence
12 of TAWC, TWS customers will benefit by enjoying larger economies of scale and access
13 to the resources and expertise of the American Water organization, as discussed in the
14 Direct and Rebuttal Testimony of Grady Stout.²

16 **Q. HOW DOES THE COMMISSION'S REVIEW AND APPROVAL PROCESS**
17 **PROTECT TWS CUSTOMERS?**

18 A. The Commission, through its review and approval process, provides a comprehensive
19 review of proposed transfers to ensure that they align with and are in the public interest
20 and protect customers. The Commission must determine that the buyer is financially,

¹ Rebuttal Testimony of Grady Stout, p. 3.

² Direct Testimony of Grady Stout, p. 10; Stout Rebuttal Testimony, pp. 7-8.

1 managerially, and technically qualified to operate the system, and that the transaction will
2 not adversely affect customers' service quality or rates.

3 **Q. IS TAWC A FINANCIALLY, MANAGERIALLY, AND TECHNICALLY**
4 **QUALIFIED OPERATOR?**

5 A. As detailed in the Joint Petition³ and further explained by TAWC witness Grady Stout in
6 his direct and rebuttal testimonies,⁴ TAWC possesses the financial, managerial, and
7 technical qualifications to continue to provide safe and reliable service to TWS customers.

8
9 **Q. DOES THE PROPOSED TRANSACTION ADVERSELY AFFECT CUSTOMERS'**
10 **SERVICE QUALITY OR RATES?**

11 A. No. As stated in my Direct Testimony, it is my belief that TAWC will continue to provide
12 the high-quality water service that TWS has established and that our customers have grown
13 to expect.⁵ Additionally, as detailed in the Joint Petition and by TAWC's witnesses Grady
14 Stout and Robert Lane, TAWC is proposing to adopt the rates of TWS.⁶

15
16 **Q. DO THE CUSTOMERS OF TWS BENEFIT FROM THE TRANSACTION?**

17 A. Yes. As TWS is exiting its role as a water service provider in Tennessee, it is in the best
18 interest of TWS customers that a financially strong and experienced operator assumes

³ Joint Petition of Tennessee-American Water Company, American Water Works Company, Inc., Nexus Regulated Utilities, LLC, and Tennessee Water Service, Inc., Section III.

⁴ Direct Testimony of Grady Stout, p. 17; Rebuttal Testimony of Grady Stout, pp. 5-6

⁵ Direct Testimony of Tiffany Van Horn, p. 7.

⁶ Joint Petition, Section IV.; Stout Direct Testimony, p. 4; Rebuttal Testimony of Robert Lane, p.16.

1 responsibility for providing TWS's current and future customers with safe and reliable
2 water service. While TWS customers are not expected to experience any significant
3 changes as a result of the Transaction, the continuity of service and TAWC's ongoing
4 commitment to serve Tennessee itself is a benefit to these customers and in the public
5 interest. TAWC is also able to maintain TWS customers' existing service levels, which
6 avoids disruption and uncertainty and provides stability in light of the Company's exit.
7

8 **Q. DOES TAWC HAVE A PROVEN TRACK RECORD OF SUCCESSFUL**
9 **ACQUISITIONS AND INTEGRATIONS?**

10 A. Yes, my understanding is that TAWC has a proven track record of successful acquisitions
11 and subsequent integration. As detailed in Mr. Stout's Direct Testimony, TAWC has
12 operated the water system in its current footprint for nearly 140 years and has, over recent
13 years, acquired several systems that have been integrated successfully into its operations.⁷
14

15 **Q. DO YOU RECOMMEND THAT THE COMMISSION APPROVE THE**
16 **TRANSACTION?**

17 A. Yes. I recommend that the Commission approve the Transaction as proposed by TWS and
18 TAWC because it serves both the interest of the public and TWS's current and future
19 customers.

20 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

⁷ Stout Direct Testimony, p. 5.

1 **A.** Yes, it does. However, I reserve the right to update or amend this testimony upon receipt
2 of additional data or other information that may become available.

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

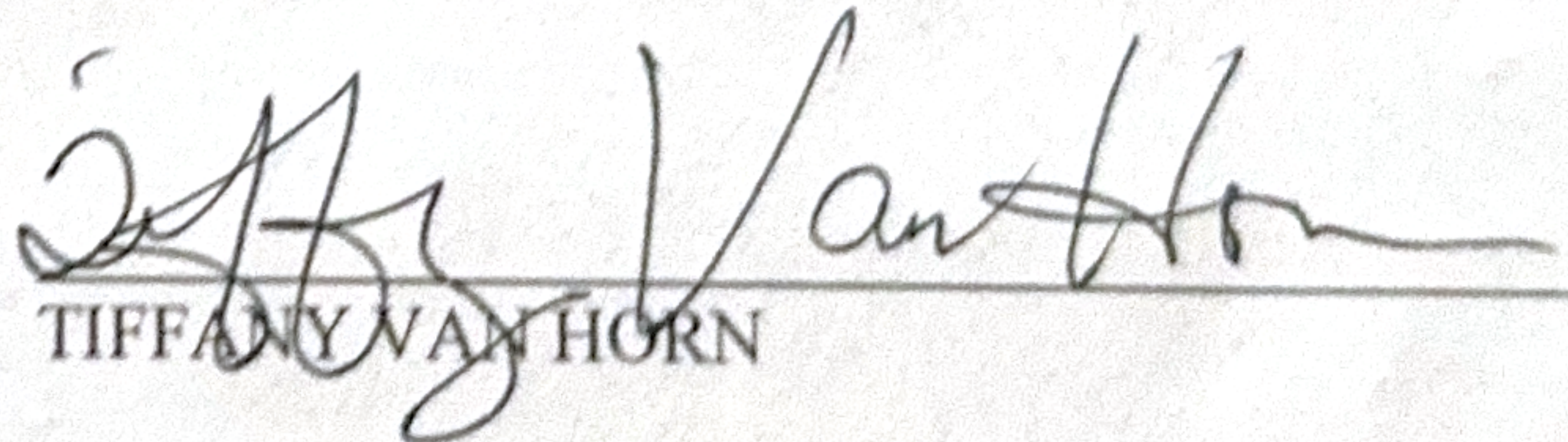
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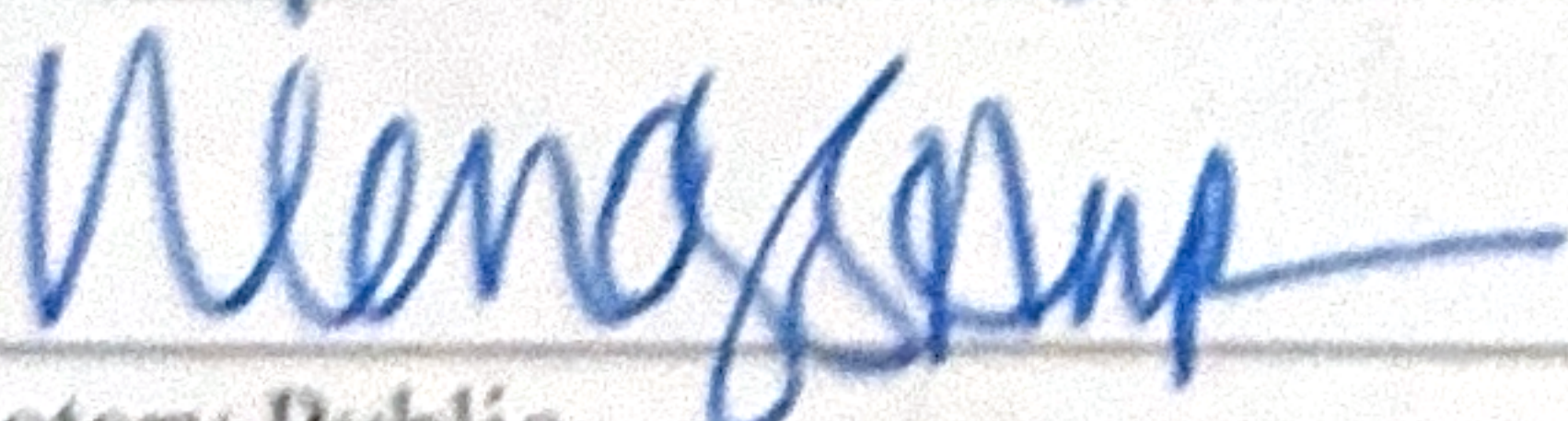
VERIFICATION

STATE OF Georgia)
COUNTY OF Gordon)

I, TIFFANY VAN HORN, being duly sworn, state that I am authorized to testify on behalf of Tennessee Water Service, Inc., in the above-referenced docket, that if present before the Commission and duly sworn, my testimony would be as set forth in my pre-filed testimony in this matter, and that my testimony herein is true and correct to the best of my knowledge, information, and belief.


TIFFANY VAN HORN

Sworn to and subscribed before me
this 9 day of October, 2025.


Notary Public

My Commission Expires: 12/29/2027

