

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

Electronically Filed in TPUC Docket
Room on January 13, 2026 at 12:14 p.m.

IN RE:)
)
PETITION OF TENNESSEE-)
AMERICAN WATER COMPANY TO)
ADOPT ANNUAL REVIEW)
MECHANISM AND ARM TARIFF)
PURSUANT TO TENN. CODE ANN. §)
65-5-103(D)(6))

DOCKET NO. 25-00089

**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS
TO TENNESSEE AMERICAN WATER COMPANY**

This Second Set of Discovery Requests is hereby served upon Tennessee-American Water Company (“TAWC” or the “Company”), 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 January 20, 2026, at 2:00 p.m. Central.

PRELIMINARY MATTERS AND DEFINITIONS

This Second Set of Discovery Requests incorporates by reference the same Preliminary Matters and Definitions as outlined in the Consumer Advocate’s First Discovery Request to TAWC, 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. Refer to the Direct Testimony of Robert C. Lane at 16:10-15. The Company proposes that the annual ARM surcharge or sur-credit be applied to all customers via an equal percentage (as they were in the 2025 Order, though applied to all rates not just the fixed meter service charge). Thus, the Company's base tariff rates remain unchanged each year, and the surcharge or sur-credit becomes the only means of adjusting customer rates as a result of the historic ARM calculation. Is this correct? If not, provide a detailed explanation and support.

RESPONSE:

2-2. In addition to Mr. Lane's testimony referenced above, refer to the Direct Testimony of Philip J. Drennan, Appendix C - Proposed Tariff, TPUC No 20, Original Sheet No. 12-ARM-3, Section 4. Methodology, Subsection C. Annual ARM Revenue Surcharge, which states:

To collect or credit ARM Revenue Adjustment, the Company shall apply an equal percentage increase to customer bills in the form of a surcharge. The percentage increase will be calculated by dividing ARM Revenue Adjustment by the Base Revenue Forecast for the Rate Effective Period.

Respond to the following and provide documentation and support:

- A. Provide the formula for determining the surcharge.
- B. How will the surcharge appear on bills?
- C. Provide examples of the formula being applied to individual bills.
- D. Will the surcharge for each customer vary based on a monthly percentage calculation applied to the bill? Or will it be the same amount every month of the year for every customer in a specific class?
- E. How will customers be informed about the surcharge and changes in the surcharge?

RESPONSE:

RESPECTFULLY SUBMITTED,



SHILINA B. BROWN (BPR No. 020689)

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TPUC Docket No. 25-00089

CA's 2nd DR to TAWC

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 13th day of January, 2026.



SHILINA B. BROWN
Senior Assistant Attorney General