

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

IN RE:)	
)	
PETITION OF TENNESSEE-AMERICAN)	
WATER COMPANY TO ADOPT ANNUAL)	DOCKET NO. 25-00089
REVIEW MECHANISM AND ARM TARIFF)	
PURSUANT TO TENN. CODE ANN. § 65-5-)	
103(d)(6))	

**CITY OF CHATTANOOGA'S FIRST DISCOVERY REQUESTS TO PETITIONER
TENNESSEE-AMERICAN WATER COMPANY**

Intervenor, the City of Chattanooga ("Chattanooga"), by and through counsel, submits the following First Discovery Requests (the "Requests") to Petitioner, Tennessee American Water Company ("TAWC"). The responses to the Requests shall be delivered to counsel for Chattanooga in accordance with the Procedural Schedule Order dated December 29, 2025.

INSTRUCTIONS AND DEFINITIONS

A. These Requests are to be deemed as continuing, and you are requested to provide, by way of supplemental responses, such additional information as may be hereafter obtained by you or any person on your behalf, which augment, supplement, or otherwise modify responses to these Requests.

B. The singular form of any defined term includes the plural form, and vice versa.

C. The word "**Document**" shall include and mean, without limitation, the original and each draft and copy of any kind of written, printed, typed, recorded, or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither. The term shall further include, without limitation, originals, all copies, all images, all backup or archived copies, and all drafts of: papers, books, writings, memoranda, letters, electronic files,

computer files, emails, text messages, correspondence, notes, book entries, accounts, statements of accounts, checks, cancelled checks, minutes of meetings, contracts, intra-office communications, intra-departmental communications, recordings or notes of telephone conversations, recordings or notes of other conversations, or meetings, affidavits, schedules, calculations, computer files, and all other written or electronic records. The term "**Document**" includes the term "**Communication**".

D. The term "**Communication**" means any oral or written statement conveyed by one person or entity to another person or entity by whatever means, including electronic **Communications**, emails, and computer files.

E. If any **Document** called for by any request herein is withheld pursuant to any purported privilege or immunity:

- (a) State the basis for such claim of privilege or immunity (e.g., attorney-client privilege, work product doctrine);
- (b) Identify the **Document** being withheld by stating the name or title of the **Document**; the type of **Document**; its date, author, addressee, and person(s) copied; a general description of its subject matter; its present location(s) and custodian(s); and each person who, to your knowledge, has seen it; and
- (c) State the number and/or portion of the request to which each such **Document** would be responsive.

F. "**TAWC**" means the Petitioner, Tennessee-American Water Company.

G. "***Subsidiaries or Affiliates***" means American Water Works Co., Inc. ("***AWK***") and all of the subsidiaries or affiliates of TAWC or AWK.

H. "***Riders***" means the four (4) alternative regulatory mechanisms approved by the Commission in Docket No. 13-000130, including a Qualified Infrastructure Investment Program Rider ("***QIIP***"), an Economic Development Rider ("***EDI***"), a Safety and Environmental Compliant Rider ("***SEC***"), and a Production Costs and Other Pass-throughs Rider ("***PCOP***"). Each is defined individually as a "Rider".

I. "***Capital Recovery Riders***" means the QIIP, EDI, and SEC Riders.

J. "***Explain***" means to provide a detailed explanation of the specified subject matter and to provide all Documents reflecting, recording, referring to, reporting, or relating to the subject matter or the response.

K. "***Rate Areas***" means the seven (7) rate areas as identified in Docket No. 24-00032, including (a) the Chattanooga Area, (b) the Lakeview Area, (c) the Lookout Mountain Area, (d) the Suck Creek Area, (e) the Whitwell Inside City Area, (f) the Whitwell Outside City Area, and (g) the Jasper Highlands Area.

L. "***Recurring Project***" or "***RP***" means a capital project that TAWC undertakes on a frequent and regular basis, that requires less long-term financial and capital planning than an Investment Project or "***IP***", and that can be performed with TAWC's current workforce or existing contractors.

M. "***Investment Project***" or "***IP***" means a project that requires an investment of \$250,000 or greater and that needs significant planning.

N. **"Downstream Area Served"** means the Rate Areas, all or a portion of which, during normal system operation, receive water flowing through or from a TAWC system asset, such as a pipe, main, valve, pump, tank, or treatment plant. For example, the Downstream Area Served by the Citico pumping station is all of the Rate Areas, and the Downstream Area Served by a main carrying water to the Jasper Highlands water distribution system is the Jasper Highlands Rate Area.

O. **"Identify"** means: (i) when used with reference to an individual person, to state his/her full name, employer, job title, present or last known residence address and telephone number, and present or last known business address and telephone number: and (ii) when used with reference to a Document, means to state the type of the Document, its date, author, addressee, any other recipient(s), general subject matter, present location, and custodian. If any Document to be identified was, but no longer is, in your possession, state the disposition that was made of it and the reasons, facts, or circumstances associated with its disposition.

DISCOVERY REQUESTS

1. If an ARM is approved, will TAWC submit in its annual filing schedules identifying the Downstream Areas Served by each Recurring Project and each Investment Project in which TAWC made capital investments? If not, why not?

RESPONSE:

2. If an ARM is approved, will TAWC submit in its annual filing schedules describing any expenses that related to or benefitted fewer than all Rate Areas and indicating for each such expenditure which Rate Area(s) the expenses related to or benefitted? If not, why not?

RESPONSE:

3. If an ARM is approved, will TAWC submit in its annual filing schedules identifying the location(s), by latitude and longitude or by census tract and block number, of each Recurring Project in which TAWC made capital investments? If not, why not?

RESPONSE:

4. If an ARM is approved, will TAWC submit in its annual filing schedules identifying the location(s), by latitude and longitude or by census tract and block number, of each Investment Project in which TAWC made capital investments? If not, why not?

RESPONSE:

5. For each year since 2012 identify the total of the investments made during that year by TAWC that was not recovered through the Capital Recovery Riders.

RESPONSE:

6. For each year since 2012 identify the amount by which the amount recovered in the Capital Recovery Riders for that year equaled, was more than, or was less than the total of the TAWC investment plus the rate of return authorized for TAWC by the Commission.

RESPONSE:

7. Identify the number, by customer class, of TAWC customers in each of TAWC's Rate Areas as of December 31, 2025.

RESPONSE:

8. Please provide the net book income and the return on equity produced by that net book income for each fiscal period addressed in a TAWC Capital Recovery Riders filing since 2014.

RESPONSE:

Respectfully Submitted,

CITY OF CHATTANOOGA

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon the following persons via U.S. Mail, with a courtesy copy by electronic mail:

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This the 13th day of January, 2026.



For Chambliss, Bahner & Stophel, P.C.