

BUTLER | SNOW

February 6, 2026

VIA ELECTRONIC FILING

Hon. David Jones, Chairman
c/o Ectory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

Electronically Filed in TPUC Docket
Room on February 6, 2026 at 3:01 p.m.

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*

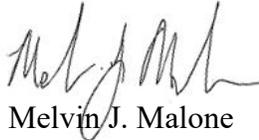
Dear Chairman Jones:

Attached for filing please find *Tennessee-American Water Company's Discovery Requests to the City of Chattanooga*.

As required, copies will be mailed to your office. Should you have any questions concerning this filing, or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

clw

Attachment

cc: Bob Lane, TAWC
Shilina Brown, Consumer Advocate Division
Phillip Noblett, City of Chattanooga
Frederick Hitchcock, City of Chattanooga

*Neuhoff Building
1320 Adams Street, Suite 1400
Nashville, TN 37208*

MELVIN J. MALONE
615.651.6705
melvin.malone@butlersnow.com

T 615.651.6700
F 615.651.6701
www.butlersnow.com

BUTLER SNOW LLP

99470996.v1

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

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

**TENNESSEE-AMERICAN WATER COMPANY’S
DISCOVERY REQUESTS TO THE CITY OF CHATTANOOGA**

Tennessee-American Water Company (“TAWC”) respectfully submits the following discovery requests to the City of Chattanooga (“COC”). Pursuant to the Order Establishing Procedural Schedule, the responses are to be produced at the office of the undersigned counsel, Melvin Malone, at Butler Snow LLP, 1320 Adams Street, Suite 1400, Nashville, Tennessee 37208, on February 12, 2026.

Instructions

As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of or accessible to the COC, its witnesses or counsel.

A. Please identify by name, title, position, and responsibility the person or persons answering each of these discovery requests for information.

B. These requests shall be deemed continuing so as to require further and supplemental responses if the COC receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

C. To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper or information.

D. To the extent that any request may be answered by way of a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file which would not be self-evident to a person not familiar with the document or file.

E. If the COC has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for TAWC as soon as possible.

F. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.

G. In the event any document requested has been destroyed or transferred beyond the control of the COC or any of its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

H. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer TAWC to the record where the document is located.

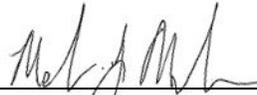
DISCOVERY REQUEST NO. 1:

At 6:25-26 of COC Witness Mark E. Garrett’s Pre-filed Testimony, Mr. Garrett recommends “normalization adjustments for unusual expenditures[.]”¹

- (a) Please provide examples of unusual expenses that would require normalization adjustments as you propose.
- (b) Please explain why the normalization adjustments that Mr. Garrett recommends are necessary in an Annual Review of Rates Mechanism that resets rates prospectively based on an annual test period?

RESPONSE:

RESPECTFULLY SUBMITTED,



Melvin J. Malone (BPR #013874)
BUTLER SNOW LLP
1320 Adams Street, Suite 1400
Nashville, TN 37208
Tel: (615) 651-6700
Melvin.Malone@butlersnow.com

Attorneys for Tennessee-American Water Company

¹ *Pre-filed Testimony of CAD Witness Mark E. Garrett*, 6:25-26, TPUC Docket No. 25-00089 (Feb. 3, 2026) (hereinafter “Garrett”). See also *Garrett* at 35:19, 36:5-10.

CERTIFICATE OF SERVICE

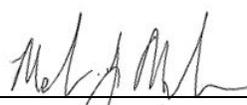
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Shilina Brown, Esq.
Senior Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, TN 37202-0207
Shilina.Brown@ag.tn.gov

Phillip Noblett, Esq.
City of Chattanooga
300 City Hall Annex
East 11th Street
Chattanooga, TN 37403
noblett@chattanooga.gov

Frederick L. Hitchcock
Cecilia Y. Garrett
Chambliss, Bahner & Stophel, P.C.
Suite 1700, Liberty Tower
605 Chestnut Street
Chattanooga, TN 37450
rhitchcock@chamblisslaw.com
cgarrett@chamblisslaw.com

This the 6th day of February 2026.



Melvin Malone