

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

IN RE:)
)
PETITION OF TENNESSEE-)
AMERICAN WATER COMPANY) **DOCKET NO. 26-00002**
REGARDING THE 2026 PRODUCTION)
COSTS AND OTHER PASS-)
THROUGHS RIDER)

**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 Tennessee 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 Vance L. Broemel, on or before 2:00 p.m. (Central), March 12, 2026.

PRELIMINARY MATTERS AND DEFINITIONS

These Additional Discovery Requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate’s First Set of Discovery Requests to TAWC* sent to the Company on February 11, 2026, and 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. Reconciliation. Refer to the Petition, File <Workpaper_Fuel & Power – 2025.xlsx>, Tab “Monthly Totals.” Specifically, refer to Cell I24 of this spreadsheet that shows \$2,865,187 for the “General Ledger Total” during the review period.

Next, refer generally to the Company’s Response to CAD DR No. 1-1, File <TAW_CADDR1_NUM001_Attachment.xlsx>. Specifically refer to the monthly amounts for Accounts 515xxxxx that relate to Fuel & Purchased Power Expenses which total to \$2,861,532 for the review period. Provide a reconciliation between these two amounts that are shown in detail below.

Date	As Filed	Trial Balance	Difference
Dec-24	\$141,745	\$142,084	\$-340
Jan-25	48,637	48,077	560
Feb-25	175,900	175,302	598
Mar-25	119,005	118,530	475
Apr-25	45,059	44,766	293
May-25	144,712	144,473	238
Jun-25	39,816	39,533	283
Jul-25	276,168	275,835	333
Aug-25	78,688	78,340	348
Sep-25	197,911	197,593	318
Oct-25	1,372,792	1,372,505	287
Nov-25	224,755	224,494	261
Total	\$2,865,187	\$2,861,532	\$3,655

RESPONSE:

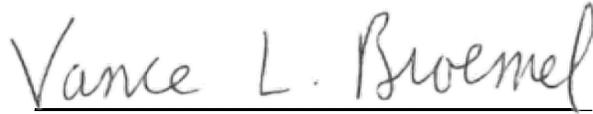
2-2. **Reconciliation.** Refer to the Petition, File <Confidential Workpaper_Waste Disposal – 2025.xlsx>, Tab “Monthly Totals” that was included with the filing. Specifically refer to Cell M23 of this spreadsheet that shows [REDACTED] for the “General Ledger Totals” during the review period.

Next, refer generally to the Company’s Response to CAD DR No. 1-1, File <TAW_CADDR1_NUM001_Attachment.xlsx>. Specifically refer to the monthly amounts for Account 51110000 that relate to Waste Disposal Expenses which total to \$728,672 for the review period. Provide a reconciliation between these two amounts which are shown in detail below.

Date	As Filed	Trial Balance	Difference
Dec-24	[REDACTED]	\$57,274	[REDACTED]
Jan-25	[REDACTED]	80,834	[REDACTED]
Feb-25	[REDACTED]	75,625	[REDACTED]
Mar-25	[REDACTED]	59,771	[REDACTED]
Apr-25	[REDACTED]	55,310	[REDACTED]
May-25	[REDACTED]	87,606	[REDACTED]
Jun-25	[REDACTED]	-24,572	[REDACTED]
Jul-25	[REDACTED]	134,144	[REDACTED]
Aug-25	[REDACTED]	-36,931	[REDACTED]
Sep-25	[REDACTED]	62,131	[REDACTED]
Oct-25	[REDACTED]	109,808	[REDACTED]
Nov-25	[REDACTED]	67,671	[REDACTED]
Total	[REDACTED]	\$728,672	[REDACTED]

RESPONSE:

RESPECTFULLY SUBMITTED,



VANCE L. BROEMEL (BPR No. 011421)

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TPUC Docket No. 26-00002

CA's 2nd DR to TAWC

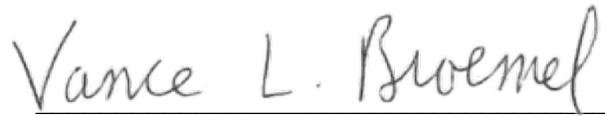
CERTIFICATE OF SERVICE

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

Robert C. Lane
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This the 4th day of March, 2026.



VANCE L. BROEMEL
Senior Assistant Attorney General