



**VIA ELECTRONIC MAIL**

May 15, 2020

Hon. Robin Morrison  
Chair  
c/o Ectory Lawless, Dockets & Records Manager  
Tennessee Public Utility Commission  
Andrew Jackson State Office Building  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

**Re: INFORMATIONAL FILING OF TENNESSEE-AMERICAN WATER COMPANY (“TENNESSEE-AMERICAN WATER”) DOCKET NO.: 20-00047 RELATED TO MEASURES TAKEN DURING THE CORONAVIRUS COVID-19 PUBLIC HEALTH EMERGENCY**

Dear Chair Morrison:

Tennessee-American Water Company (“Tennessee-American Water”) submits this update for the week ending May 16, 2020, in response to the Commission’s Ongoing Request for Information Related to Measures Taken During the Coronavirus COVID-19 Public Health Emergency.

At Tennessee-American Water our employees work hard every day to deliver clean, safe, reliable, and affordable water services because our customers deserve nothing less. The emergency operational and response measures detailed in our earlier filings are ongoing.

The current health emergency is a fast-moving event and we continue to assess, evolve, adapt and execute on our daily operations.

We welcome the opportunity to continue to inform you of the measures we are taking to assist our customers, employees, and communities during the COVID-19 crisis.

**CUSTOMER SERVICE**

For Tennessee-American Water’s customers, given the importance of personal hygiene in preventing the spread of the coronavirus, starting on March 12, 2020, the company: suspended all billing-related service shutoffs; reinstated water service for customers who previously had water turned off due to non-payment; suspended late fees; and continues to work with customers on payment arrangements if they are experiencing financial hardship. Tennessee-American Water’s voluntary actions align with the Commission’s Order of March 27, 2020, in Docket 20-00047.

## **AMERICAN WATER'S COVID-19 DIRECTIVES**

American Water has established clear priorities across our organization focused in three areas:

- The first is the care and safety of our employees and their families
- The second is the safety of our customers and the communities we serve; and
- The third is the execution of our preparedness plans so we can continue to provide essential services and help our communities during this public health emergency

We will maintain our remote work from home directive, for those who can, through May 31. The company is also maintaining the following directives, until further notice, in an effort to continue to keep employees, customers and the communities we serve safe:

- Maintaining our current business travel and external meeting ban;
- Suspending all non-emergency, in-home appointments and limiting the amount and nature of contact with customers during field appointments;
- Company crews remain hard at work - we also continue to follow social distancing recommendations issued by the Centers for Disease Control and Prevention;
  - Tennessee-American Water has applied social distancing magnets to our work vehicles and have work site signage that emphasizes keeping at least six feet between our employees and the general public.
- One employee per vehicle, when possible.

## **STAYING IN TOUCH WITH EMPLOYEES AND CUSTOMERS**

### **Best Places to Work**

Tennessee-American Water is one of the companies in Chattanooga to be recognized as Best Places to Work.

### **Pulse Surveys – 1 & 2**

In addition, three weeks ago, American Water completed its first Pulse Survey of employees across the business. The survey allowed the company to touch base with employees, learn how they are and collected feedback on what the company can do to continue to support them. Yesterday, American Water launched its second Pulse Survey in an effort to continue to engage with employees and receive valuable input for our reintegration to be successful.



### **Continued Large Building Flushing Messaging**

Through this [one-pager](#) and press releases, Tennessee-American Water encourages building owners and operators to adopt a proactive approach that includes proper flushing procedures, adjustment of hot water temperature, and proper maintenance of building plumbing and heating/cooling systems. Proper flushing of plumbing before reoccupying these buildings is essential to maintain water quality in the internal plumbing system and should be performed biweekly while the building is closed, if possible, and again the days immediately prior to opening.

The updated one-pager contains the EPA's updated [guidance on maintaining building water quality](#) and a [checklist for restoring water quality in buildings for reopening](#) (see below).



**A REMINDER FOR SCHOOLS AND BUSINESSES THAT CLOSED AS A RESULT OF THE CORONAVIRUS**

Extended periods of inactivity can cause lead leaching or legionella growth. Taking proper steps can help minimize potential exposure to both these contaminants.

**FOR MORE INFORMATION**

For more information, customers can contact the US Environmental Protection Agency's Safe Drinking Water Hotline at 1-800-426-4791 or visit:

<https://www.cdc.gov/coronavirus/2019-ncov/php/building-water-system.html>

[https://www.epa.gov/sites/production/files/2018-09/documents/flushing\\_best\\_practices\\_fact\\_sheet\\_508.pdf](https://www.epa.gov/sites/production/files/2018-09/documents/flushing_best_practices_fact_sheet_508.pdf)

<https://www.awwa.org/Resources-Tools/Resource-Topics/Coronavirus#10681543-shutoffs-and-return-to-service-guidance>

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**HAS YOUR FACILITY BEEN CLOSED FOR WEEKS? FLUSH THE PIPES.**

At Tennessee American Water, we remain committed to keeping you informed as we continue our work to deliver clean, safe and reliable water services to you during the COVID-19 public health emergency.

As buildings reopen, businesses, school districts and property management teams will begin the process of restarting building systems that have been dormant for a significant amount of time. Proper reopening procedures help in verifying that water systems and equipment are in safe working order.

Building owners and operators are encouraged to adopt a proactive approach that includes proper flushing procedures, adjustment of hot water temperature, and proper maintenance of building plumbing and heating/cooling systems. Proper flushing of plumbing before reopening these buildings is essential to maintain water quality in the internal plumbing system and should be performed biweekly while the building is closed, if possible, and again the days immediately prior to opening.

**WHO SHOULD FLUSH**

Facilities, schools or any buildings that have been dormant or closed for extended periods.

**HOW TO FLUSH**

The general purpose of flushing is to bring fresh water into all sections of the building. This will require running water through all fixtures long enough to replace stagnant water. The time needed to complete this will be location-specific and may range from a few minutes for smaller buildings to more than 30 minutes for larger or more complex plumbing systems. You should consider the size and layout of your building when thinking about how long is appropriate to flush. Water quality indicators such as temperature change or chlorine smell may be used, where possible, as indicators that fresh water has reached all fixtures within the plumbing system.

When performing a flush, remember to continually monitor the facilities to avoid damage from leaks or flooding. Open fixtures should be monitored and obtain professional help where needed.

In addition to bringing fresh water into the building, it is also important to flush individual fixtures. The following is provided as a general guidance of flush times for water through different types of fixtures:

- Toilets:** Flush at least twice.
- Faucets:** Run both hot and cold water at full flow for at least 2 minutes. Longer times may be needed depending on location.
- Showers:** Run both hot and cold water at full flow for at least 2 minutes. Longer times may be needed depending on location.
- Other Appliances/Apparatus:** We recommend flushing other appliances and apparatus thoroughly, at full flow, bringing fresh water into the system. If you have an appliance such as a refrigerator or ice maker that has a filter, follow manufacturer's instructions to replace water filters after completion of flushing.

For more information on building flushing, please visit the CDC, EPA and AWWA websites at the links provided on the left side of this document.

## MAINTAINING OR RESTORING WATER QUALITY IN BUILDINGS WITH LOW OR NO USE

Building and business closures for weeks or months reduce water usage, potentially leading to stagnant water inside building plumbing. This water can become unsafe to drink or otherwise use for domestic or commercial purposes. For example, optimal growth conditions for undesirable pathogens, such as Legionella bacteria, can occur when hot water temperatures decrease and disinfectant residuals (e.g., chlorine) drop to low levels. Water chemistry changes may also increase corrosion and leaching of metals, including lead, and may cause the formation of disinfection byproducts. Turning on the water for immediate use after it has been stagnant can pose a risk to public health if not properly managed. Additionally, turning on water after a prolonged period of non-use could disrupt pipe and plumbing scales to such an extent that microbial and chemical contaminants could be released into the water.

**EPA recommends that building owners and managers take proactive steps to protect public health by minimizing water stagnation during closures and taking action to address building water quality prior to reopening.**

### How can we maintain water quality while buildings/businesses are closed?

While buildings/businesses are closed, proactive steps can be taken to prevent stagnation and maintain building water quality. Maintaining the water quality may help prevent the need to perform more complex restoration steps before reopening. The following are recommended steps to take while buildings are closed:

#### For building owners/managers:

- **Review and understand the plumbing configuration and water usage in your building.** The U.S. Centers for Disease Control and Prevention (CDC) provides guidance on building water systems in their Water Management Program toolkit (see Resources section below for a link to that guidance).
- **Inspect the plumbing** to ensure it is functioning properly and is in good condition.
- **Contact your water utility** if you have questions on the status of water usage and quality in the distribution system in your area and to coordinate maintenance activities, if necessary. See the "For public water systems" section below for specific information that may be useful to discuss with your water utility.
- **Maintain any water treatment systems** used in the building, such as any point of entry or point of use filters or water softeners.
- **Maintain the hot water system**, including keeping the temperature at or above 120°F per CDC guidance to prevent Legionella growth. See CDC's guidance for reopening buildings for additional information referenced in the Resources section below.
- **Flush the building's plumbing system regularly.**
  - Flush cold and hot water at all water points of use (faucets, showers, toilets, drinking fountains, and water using devices such as dishwashers and refrigerators/ice makers) to replace the water that has been standing in the pipes. Flushing involves opening taps and letting the water run to remove water that has been standing in the interior pipes and/or outlets. The flushing time can vary by the plumbing configuration and type of outlet being cleared.
    - It is important to flush the service line that runs from the water main to the building before flushing the rest of the building's plumbing system.

For more information, please visit: [EPA.GOV/CORONAVIRUS](https://www.epa.gov/coronavirus)



## RESTORING WATER QUALITY IN BUILDINGS FOR REOPENING

### CHECKLIST

Building and business closures for weeks or months reduce water usage, potentially leading to stagnant water inside building plumbing. This water can become unsafe to drink or otherwise use for personal or commercial purposes. EPA recommends that building owners, building managers, and businesses take steps to flush the building's plumbing before reopening.

*Flushing involves opening taps and letting the water run to remove water that has been standing in the interior pipes and/or outlets. The flushing time can vary by the plumbing configuration and type of outlet being cleared.*

#### 1 BEFORE FLUSHING BUILDINGS

- Contact your water utility about local water quality and to coordinate maintenance activities.
- Check information from your local public health department for any local requirements for reopening.
- Follow appropriate regulations and policies for worker safety and health.

#### 2 STEPS FOR FLUSHING BUILDINGS

- Review how water moves through your building, from the street to each point of use.
- Inspect the plumbing.
- Maintain any water treatment systems (e.g., filters, water softeners) following manufacturer's instructions.
- Ensure the hot water system is operating as specified.
- Flush the service line that runs from the water main to the building.
- Flush the cold water lines.
- Drain and clean water storage facilities and hot water heaters.
- Flush the hot water lines.
- Flush, clean, and maintain devices connected to the plumbing system following manufacturer's instructions.

Consider checking water quality parameters to verify that fresh water is being flushed through the entire plumbing system.

#### 3 OTHER ACTIONS TO CONSIDER

- Notify your building occupants of the status of the water systems and the flushing program.
- Limit access to or use of the water as an appropriate cautionary phase.
- Determine if proactive disinfection/heat treatment is necessary.
- Develop a water management program.

For more information, please visit: [EPA.GOV/CORONAVIRUS](https://www.epa.gov/coronavirus)



Tennessee-American Water is grateful to the Commission for its leadership and stands ready to answer any questions you may have. Please feel free to contact me at 423-771-4792 or [darlene.williams@amwater.com](mailto:darlene.williams@amwater.com).

Respectfully submitted,

A handwritten signature in black ink that reads "Darlene Williams". The signature is written in a cursive style.

Darlene Williams

President

Tennessee-American Water

