

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

**PETITION OF CHATTANOOGA GAS  
COMPANY FOR APPROVAL OF  
ADJUSTMENT OF ITS RATES AND  
CHARGES, COMPREHENSIVE RATE  
DESIGN PROPOSAL, AND REVISED  
TARIFF**

)  
)  
)  
) **DOCKET NO. 06-00175**  
)  
)  
)

REC'D  
2006 JUL 10 PM 1:19  
T.R.A. DOCKET ROOM

---

**PETITION TO INTERVENE**

---

Paul G. Summers, the Attorney General for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of Attorney General (hereinafter "Consumer Advocate"), pursuant to Tenn. Code Ann. § 65-4-118(c)(2)(A), respectfully petitions the Tennessee Regulatory Authority to convene a rate hearing, and to grant the Consumer Advocate's intervention in this proceeding on behalf of the public interest, because consumers may be adversely affected by the rate increases, changes and alterations requested by Chattanooga Gas Company. For cause, the Petitioner would show as follows:

1. In order to represent the interests of Tennessee consumers, the Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118(c)(2)(A) to initiate a contested case and to intervene or participate in proceedings concerning public utility matters in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. § 4-5-101, *et. seq.*

2. Chattanooga Gas Company (hereinafter "Chattanooga Gas") is a public utility

company regulated by the Tennessee Regulatory Authority (hereinafter “TRA”) pursuant to Title 65, Chapters 4 and 5, Tennessee Code Annotated. Chattanooga Gas has its principal offices at 2207 Olan Mills Drive, Chattanooga, Tennessee.

3. Chattanooga Gas sells and distributes natural gas to residential, commercial and industrial consumers in the State of Tennessee.

4. On June 30, 2006, Chattanooga Gas filed a petition seeking approval to increase the rates that it charges customers for distribution of natural gas. Chattanooga Gas also requests a proposed comprehensive rate design plan and a bare steel and cast iron replacement tracker, both of which would result in increased rates for consumers in the future.

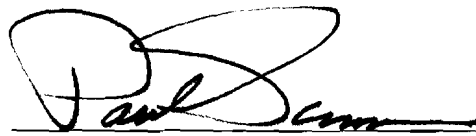
5. If the TRA approves the petition of Chattanooga Gas in its present form, such action would result in significantly higher rates for the distribution of natural gas. The rate increase proposed would result in an increase of approximately 7.59% for residential customers, 9.58% for the commercial and industrial general customer class, and 4.95% for the medium commercial and industrial general customer class. The dollar amount of the requested increase is more than \$5.8 million annually.

6. Based upon the Consumer Advocate’s preliminary review of the testimony and documentation that Chattanooga Gas filed in support of its petition, the Consumer Advocate alleges that approval of the petition in its present form is not in the public interest, and that the amount of the requested rate increase is not fair, just and reasonable under all the attendant conditions and circumstances.

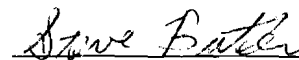
7. Only by participating and intervening in this proceeding can the Consumer Advocate work effectively to protect the interests of Tennessee consumers.

WHEREFORE, the Consumer Advocate and Protection Division prays that the Tennessee Regulatory Authority will: (a) convene a rate case proceeding pursuant to Tenn. Code Ann. § 65-5-203 to hear and determine whether the rate increases, changes and alterations requested by Chattanooga Gas Company are fair, just and reasonable; (b) grant the Consumer Advocate and Protection Division's Petition to Intervene; and (c) grant the Consumer Advocate and Protection Division and the consumers of Tennessee such other relief as may be deemed appropriate.

RESPECTFULLY SUBMITTED,



PAUL G. SUMMERS, B.P.R. #6285  
Tennessee Attorney General



STEPHEN R. BUTLER, B.P.R. #14772  
Assistant Attorney General

Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, Tennessee 37202  
(615) 741-8722  
FAX: (615) 532-2910

Dated: July 10, 2006

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served on parties below via U.S. Mail or facsimile on July 10, 2006.

Steven L. Lindsey, Vice President-Operations  
Chattanooga Gas Company  
2207 Olan Mills Drive  
Chattanooga, TN 37421  
FAX: (423) 490-4326

Archie Hickerson, Director Regulatory Affairs  
AGL Resources Inc.  
150 W. Main Street, Suite 1510  
Norfolk, VA 23510  
FAX: (757) 616-7508

J. W. Luna, Esq.  
Jennifer L. Brundige, Esq.  
Farmer & Luna, PLLC  
333 Union Street, Suite 300  
Nashville, TN 37201  
FAX: (615) 254-7123

Elizabeth Wade, Senior Regulatory Counsel  
AGL Resources Inc.  
Ten Peachtree Place, N.W., 15th Floor  
Atlanta, GA 30309  
FAX: (404) 584-3714



STEPHEN R. BUTLER  
Assistant Attorney General

#97152