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July 18, 2006

Chairman Sara Kyle
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

VIA FEDERAL EXPRESS

ATTN: Sharla Dillon

Re: *In re Petition of Chattanooga Gas Company for Approval of Adjustment of Its Rates and Charges, Comprehensive Rate Design Proposal, and Revised Tariff;*

TRA Docket No. 06-00175

Dear Chairman Kyle:

I have enclosed for filing an original and fourteen (14) copies of a Petition of Chattanooga Manufacturers Association For Leave To Intervene in the above-styled case. Also enclosed is this firm's check in the amount of Twenty-Five Dollars (\$25.00) to satisfy the filing fee. I have enclosed a copy of the Petition and would appreciate it being returned in the enclosed, self-addressed envelope stamped "filed."

If you have any questions regarding the same, please do not hesitate to contact me.

Very truly yours,

David C. Higney

DCH:chg
Enclosures

cc: Director Ron Jones
Director Eddie Roberson
Henry M. Walker, Esq.
J.W. Luna, Esq.

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

IN RE:	*	
	*	
PETITION OF CHATTANOOGA GAS	*	DOCKET NO. 06-00175
COMPANY FOR APPROVAL OF	*	
ADJUSTMENT OF ITS RATES AND	*	
CHARGES, COMPREHENSIVE RATE	*	
DESIGN PROPOSAL, AND REVISED	*	
TARIFF	*	

**PETITION OF THE CHATTANOOGA MANUFACTURERS ASSOCIATION
FOR LEAVE TO INTERVENE**

The Chattanooga Manufacturers Association (hereinafter “CMA”), by and through its counsel, pursuant to *Tenn. Code Ann.* §65-2-107 and Rule 1220-1-2-.08 of the Tennessee Regulatory Authority (the “Authority”), respectfully petitions to intervene in this docket as a party of record on behalf of CMA’s members and certain consumers that may be adversely affected by Chattanooga Gas Company’s (“the Company’s”) proposal to change and increase certain rates and charges, revise tariffs and redesign rates. In support of its petition, CMA states as follows:

1. The Chattanooga Manufacturers Association is a one-hundred year old trade association representing over 250 manufacturers and other businesses supporting, servicing and associated with the manufacturing sector, many of whom are customers of the Company. CMA has substantial and vital interests in the outcome of the Authority’s action in this docket, and desires to intervene in order to fully protect the interests of members and those similarly situated.

2. The Authority previously has granted CMA intervention status in similar utility rate-making cases including, but not limited to, the 2004 contested case involving the Company and other contested cases involving Tennessee-American Water Company. CMA’s rights and interests are not fully and adequately represented by another party in this proceeding. CMA shares a common interest with the public and others relative to the quality of service necessarily required of the

Company and will make a valuable contribution to the development of issues for discerning what constitutes a just and reasonable rate of return in this case.

3. In the present docket, the Company seeks approval by the Authority to adjust certain rates and charges, including increases or changes that will adversely affect CMA ratepayers and others similarly situated. The Company's petition seeks an extraordinary increase in revenue (\$5.8 million annually) and other changes that CMA avers are not fair or reasonable, nor in the best interests of CMA and other ratepayers.

4. Accordingly, CMA requests to intervene and fully participate in this case pending the rejection, modification or approval of the petition presently filed by the Company before the Authority. Such participation may include conducting discovery, presenting testimony, cross-examining witnesses, and filing briefs and other pleadings.

5. If this Petition to Intervene is granted, all notices, correspondence and copies of orders and other materials should be addressed as follows, and the following should be placed upon the Official Service List in this proceeding:

David C. Higney, Esq.
Catharine H. Giannasi, Esq.
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WHEREFORE, the Chattanooga Manufacturers Association respectfully requests that the Authority enter an Order granting this Petition to Intervene.

Respectfully submitted this 18th of July, 2006.

GRANT, KONVALINKA & HARRISON, P.C.

By: 

DAVID C. HIGNEY (BPR #14888)

CATHERINE GIANIASI (BPR #024441)

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- and -

BOULT CUMMINGS CONNERS & BERRY, PLC

HENRY M. WALKER, Esq.

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Nashville, Tennessee 37203

615/244-2582

CERTIFICATE OF SERVICE

I hereby certify that I have on this 18th day of July, 2006 served the foregoing Petition of the Chattanooga Manufacturers Association for Leave to Intervene either by fax, overnight delivery service or first class mail, postage prepaid, to all parties of record at their addresses shown below:

J.W. Luna, Esq.
Jennifer L. Brundige, Esq.
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