BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:)	
CHATTANOOGA GAS COMPANY A	CTUAL)	Docket No. 06-00298
GAS COST ADJUSTMENT FILING F	OR THE)	
TWELVE MONTHS ENDED JUNE 30), 2006)	

CONSUMER ADVOCATE'S PETITION TO INTERVENE

Robert E. Cooper, Jr., the Attorney General and Reporter for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of Attorney General ("Consumer Advocate"), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions to intervene in this docket on behalf of the public interest, because issues that affect the interests of Tennessee consumers will be addressed in this docket. For cause, the Consumer Advocate would show as follows:

- 1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to initiate a contested case and participate or intervene in proceedings to represent the interests of Tennessee consumers in accordance with the Uniform Administrative Procedures Act and with Tennessee Regulatory Authority ("TRA") rules and regulations.
- Chattanooga Gas Company ("the Company") is regulated by the TRA. The
 Company sells and distributes natural gas to Tennessee consumers.
- 3. In its request to close docket number 06-00175 filed on May 8, 2007, the Company said, "CGC's current ACA audit docket (06-00298) has been convened as a contested case, so this docket will afford the parties the same opportunity to discuss and litigate the capacity and asset management issues." (Request to Close Docket, page 2).

4. Based on this representation by the Company, the Consumer Advocate petitions to

intervene in this docket for the purpose of discussing and litigating the pipeline capacity, gas

storage and asset management issues that the Consumer Advocate raised in docket number 06-

00175.

5. The pipeline capacity, gas storage and asset management issues raised by the

Consumer Advocate in docket number 06-00175, which the Company has represented can be

discussed and litigated in this docket, affect the interests of Tennessee consumers.

6. Discovery will need to be conducted to supplement the information found by the

Consumer Advocate about these issues in the public domain.

7. The scope of the contested case in this docket will need to be expanded to

constitute a real and full contested case. Currently, the scope of the contested case is limited to

the resolution of issues related to the entry of a protective order.

8. By intervening and participating in this proceeding, the Consumer Advocate will

be able to work to protect the public interest.

Wherefore, the Consumer Advocate respectfully asks the TRA to grant the petition to

intervene and to expand the scope of the docket to make it a real and full contested case.

RESPECTFULLY SUBMITTED,

ROBERT E. COOPER, JR., B.P.R. #10934

Attorney General and Reporter

State of Tennessee

Stove Butter

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the parties of record via U.S. Mail, commercial delivery, facsimile, e-mail or hand delivery on May 17, 2007.

Store Butter
Stephen R. Butler