IN THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE	
IN RE: CHATTANOOGA GAS COMPANY'S ANNUAL INCENTIVE PLAN FILING FOR THE TWELVE MONTHS ENDED JUNE 30, 2005	) DOCKET NO. 08-00012 DOCKET NO. 05-00322 ) ) ) )

## 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 the Consumer Advocate respectfully seeks the opportunity to advocate the consumers' perspective for the Tennessee Regulatory Authority ("TRA") to consider during its deliberations regarding the proposed asset management and gas purchase agreements that Chattanooga Gas Company ("CGC") has submitted under seal for approval by the TRA. For cause, the Petitioner would show as follows:

- 1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers by initiating contested cases and by participating or intervening in proceedings in accordance with the Uniform Administrative Procedures Act and Tennessee Regulatory Authority rules.
- 2. CGC is a public utility regulated by the Tennessee Regulatory Authority. CGC sells and distributes natural gas to consumers in the State of Tennessee. CGC's principal place of business

business in Tennessee is 2207 Olan Mills Drive, Chattanooga, Tennessee 37421.

- 3. In an order entered on April 24, 2007, the TRA required CGC to rebid its asset management and gas purchase agreements prior to the end of March 31, 2008, and also required CGC to bring those agreements before the TRA for approval. (Order Adopting IPA Report of Tennessee Regulatory Authority's Utilities Division, page 2).
- 4. On January 7, 2008, counsel for the Consumer Advocate reviewed CGC's request for proposals ("RFP") and the attached form contracts at the offices of counsel for CGC.
- 5. On or about January 14, 2008, CGC submitted the proposed asset management and gas purchase agreements under seal to the TRA for approval.
- 6. The Consumer Advocate respectfully seeks the opportunity to advocate the consumers' perspective for the TRA to consider during its deliberations regarding whether to approve the proposed asset management and gas purchase agreements that CGC has submitted under seal.
- 7. Counsel for CGC stated verbally on January 14, 2008, that CGC would not oppose the Consumer Advocate's intervention in this docket.
- 8. Only by intervening and participating in this proceeding can the Consumer Advocate work adequately to protect the interests of consumers.

Wherefore, Petitioner respectfully asks the Authority to grant the Petition to Intervene.

## RESPECTFULLY SUBMITTED,

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

Attorney General and Reporter

State of Tennessee

Stephen R. Butler, B.P.R. #14772

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Dated: 1-29-63

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via first-class U.S. Mail, postage prepaid, or electronic mail upon the parties of record in this case.

This the  $27 \stackrel{\triangle}{=} day of \underline{January}$ , 2008.

Stave Buller Stephen R. Butler

Assistant Attorney General

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