

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

June 10, 2008

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T.R.A. DOCKET ROOM

IN RE:

GENERIC CONTESTED CASE TO ANALYZE )  
AND EVALUATE THE COST-BENEFITS )  
AND FUNDING MECHANISMS FOR )  
ENERGY CONSERVATION RESEARCH )

Docket No: 08-00064

**PETITION TO INTERVENE**

Chattanooga Gas Company ("CGC" or "Company"), by and through its counsel, pursuant to Tenn. Code Ann. § 65-2-107 and § 4-5-310 and Tennessee Regulatory Authority ("TRA" or "Authority") Rule 1220-1-2-.08, respectfully petitions to intervene in this docket as a party of record. In support of its petition, CGC states as follows:

1. At the February 11, 2008 TRA conference, the TRA voted unanimously in the Home Energy Conservation Docket (06-00309) to open a generic contested case docket in which to discuss issues related to energy conservation research, including but not limited to the selection of a research institution, funding mechanisms, and the cost-benefit of contributions to research and development. See March 19, 2008 TRA Order in Docket 06-00309, at 2.
2. Accordingly, the present docket was opened on April 23, 2008.
3. The Hearing Officer in this docket issued a Notice of Status Conference dated May 30, 2008, in which a status conference was scheduled for June 12, 2008, and any party wishing to participate was instructed to file a petition to intervene by June 9, 2008.
4. CGC did not receive the May 30, 2008 Notice until June 10, 2008 when Archie Hickerson received the Notice by facsimile from the Authority.

5. As this docket was recently commenced and no filings or public hearings have occurred, granting CGC's petition for intervention will not impair the interests of justice or the orderly conduct of the proceedings.

6. CGC has participated in both the TRA's Home Energy Task Force and in TRA Docket 06-00309. In fact, CGC submitted a proposed energy conservation pilot program to the TRA on August 8, 2007. As part of this pilot program, CGC proposed that a \$0.10 monthly Energy Research Surcharge be applied to each customer's bill to fund energy conservation research and that the funds be disbursed as directed by the Authority.

7. CGC, as a local distribution company, has an interest in the issue of energy conservation, including the funding of conservation research and development.

8. If this petition is granted, all notices, correspondence, copies of pleadings and orders should be sent to the following:

Archie Hickerson, Director Regulatory Affairs  
AGL Resources Inc.  
150 W. Main Street, Suite 1510  
Norfolk, VA 23510  
Telephone: (757) 616-7510  
Facsimile: (757) 616-7508

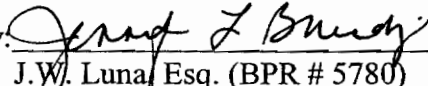
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Elizabeth Wade, Senior Regulatory Counsel  
AGL Resources Inc.  
Ten Peachtree Place, N.W., 15<sup>th</sup> Floor  
Atlanta, GA 30309  
Telephone: (404) 584-4000  
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9. As this docket is determining the funding mechanism for energy conservation research, CGC's legal rights, duties, and privileges may be affected by the outcome of these proceedings. Therefore, CGC's respectfully requests that it be allowed to intervene and participate in this docket.

Respectfully submitted,

FARMER & LUNA, PLLC

By:   
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Nashville, TN 37201  
(615) 254-9146  
*Attorneys for Chattanooga Gas Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been forwarded via hand delivery to the following on this the 10th day of June, 2008.

Gary Hotvedt, Esq.  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

