BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

GENERIC CONTESTED CASE TO ANALYZE AND EVALUATE THE COST BENEFITS AND FUNDING MECHANISMS FOR ENERGY CONSERVATION RESEARCH	) ) DOCKET NO. 08-00064 ) )	
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## COMPLAINT AND PETITION TO INTERVENE

Robert E. Cooper, Jr., the Attorney General & Reporter 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, respectfully submits this complaint and petition to intervene on behalf of the public interest, because Tennessee consumers will be affected by actions taken in this case. The Consumer Advocate respectfully petitions as follows:

- The Consumer Advocate has the duty and authority under Tenn. Code Ann. § 65-4 118 to represent the interests of Tennessee consumers of public utilities services.
- 2. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to initiate, participate or intervene in proceedings to represent the public interest in accordance with the Uniform Administrative Procedures Act ("UAPA").
- 3. This docket has been convened to "analyze and evaluate the cost-benefits and funding mechanisms for energy conservation research" within a generic contested case.
- 4. Various proposals for funding mechanisms to support research and development in prior dockets have called for mandatory surcharges on consumers. This proceeding, in considering 120673

as yet unspecified funding mechanisms which may or may not require mandatory consumer funding, may affect the rights of Tennessee's natural gas consumers.

WHEREFORE, the Consumer Advocate prays that the Tennessee Regulatory Authority grant this petition to intervene and allow the Consumer Advocate to participate as a party in this proceeding.

RESPECTFULLY SUBMITTED,

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

Tennessee Attorney General and Reporter

RYAN L. McGEHEE, B.P.R. # 025559

Assistant Attorney General

Office of the Tennessee Attorney General Consumer Advocate and Protection Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

(615) 532-5512 (phone)

(615) 532-2910 (facsimile)

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Complaint and Petition to Intervene was served on the party below via facsimile, U.S. Mail, hand delivery, commercial delivery, or e-mail, on the \\day of June, 2008.

J. W. Luna, Esq. Jennifer L. Brundige, Esq. Farmer & Luna, PLLC 333 Union Street, Suite 300 Nashville, TN 37201 Telephone: (615) 254-9146 iwluna@farmerluna.com ibrundige@farmerluna.com

Archie Hickerson AGL Resources 150 W. Main Street, Suite 1510 Norfolk, VA 23510 Telephone: (757) 616-7510

Elizabeth Wade AGL Resources Ten Peachtree Place, N.W. 15th Floor Atlanta, GA 30309 Telephone: (404) 584-4000 ewade@aglresources.com

R. Dale Grimes Bass, Berry & Sims, PLC AmSouth Center 315 Deaderick Street, Ste.2700 Nashville, Tennessee 37238-3001 Telephone: (615) 742-6244 dgrimes@bassberry.com

William T. Ramsey A. Scott Ross Neal & Harwell PLC One Nashville Place, Suite 2000 150 Fourth Avenue North Nashville, Tennessee 37219 Telephone: (615) 244-1713 ramseywt@nealharwell.com sross@nealharwell.com

Mr. James H. Jeffries IV Moore & Van Allen PLLC 100 North Tryon Street, Suite 4700 Charlotte, NC 28202-4003 Telephone: (704) 331-1079 jeffriesj@mvalaw.com

Gary Hotvedt, Esq. Office of Legal Counsel Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505 Telephone: (615) 741-2904 Gary.Hotvedt@state.tn.us

Jane Lewis-Raymond Vice President and General Counsel Piedmont Natural Gas Company, Inc. P.O. Box 33068 Charlotte, North Carolina 28233 Jane.Lewis-Raymond@piedmontng.com

Ryan L. McGehee Assistant Attorney General

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