

**IN THE TENNESSEE REGULATORY AUTHORITY  
AT NASHVILLE, TENNESSEE**

**IN RE:** )  
**TENNESSEE WATER SERVICE, INC.** ) **DOCKET NO. 09-00017**  
**PETITION FOR RATE INCREASE** )

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**PETITION TO INTERVENE**

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Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division of the Office of the Attorney General (“Consumer Advocate”), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Regulatory Authority (“TRA” or “Authority”) to convene a contested case and grant the Consumer Advocate’s intervention into this proceeding on behalf of the public interest because consumers may be adversely affected by the petition of Tennessee Water Service, Inc. (“Tennessee Water Service”) in which Tennessee Water Service is seeking a rate increase. For cause, 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 of public utilities services by initiating and intervening as a party in proceedings before the Authority in accordance with the Uniform Administrative Procedures Act and Authority Rules.
2. Tennessee Water Service is a public utility regulated by the Authority providing water service to approximately 564 customers in Sevier County Tennessee.
3. On January 30, 2009, Tennessee Water Service filed in the Authority a Petition of Tennessee Water Service, Inc. to Change and Increase Certain Rates and Charges. If the


Authority were to approve the petition of Tennessee Water service rates would be increased approximately 70%.

4. Additional investigation and discovery will be needed to determine whether such a rate increase is warranted.

5. Only by participating in this proceeding can the Consumer Advocate work adequately to protect the interests of consumers.

WHEREFORE, Petitioner respectfully asks the Authority to convene a contested case proceeding and grant the Petition to Intervene.

RESPECTFULLY SUBMITTED,



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ROBERT E. COOPER, JR. (BPR #10934)  
Attorney General and Reporter  
State of Tennessee

*Vance L. Broemel*

VANCE L. BROEMEL (BPR #11421)  
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*March 2*  
Dated: February \_\_\_\_\_, 2009.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail or electronic mail upon:

Christopher J. Ayers  
Hunton & Williams LLP  
421 Fayetteville Street  
Suite 1400  
Raleigh, North Carolina 27601

J. Keith Coates  
Woolf, McClane  
P.O. Box 900  
Knoxville, Tennessee 37901-0900

*March 2*  
This the \_\_\_\_\_ day of February, 2009.

*Vance L. Broemel*

VANCE L. BROEMEL