

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

IN RE:)	
)	
PETITION OF CHATTANOOGA GAS)	
COMPANY FOR APPROVAL OF ITS)	
RATES AND CHARGES, MODIFICATION)	DOCKET NO. 09-00183
OF ITS RATE DESIGN, AND REVISED)	
TARIFF)	

PETITION TO INTERVENE

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 ("Authority") to grant the Consumer Advocate's intervention into this proceeding on behalf of the public interest, because consumers may be adversely affected by the request for a rate increase and the rate design changes requested by Chattanooga Gas Company, Inc. ("CGC"). 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. CGC is a public utility regulated by the Authority and distributes natural gas to consumers in the State of Tennessee.

3. On November 16, 2009, CGC filed in the Authority a Petition for approval of an upward adjustment of \$2.6 Million in the rates it charges consumers and for the implementation of a revenue decoupling mechanism with an effective date of May 17, 2010. Approval of the rate increase and the revenue decoupling mechanism may result in harm to consumers.

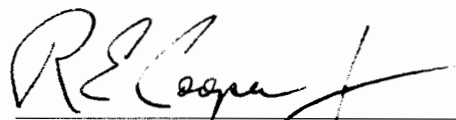
4. The Consumer Advocate alleges the design of the margin decoupling tracking mechanism may not be in the public interest and that it does not assure that the interests of CGC and consumers are properly aligned to further energy efficiency. As such, this proceeding does not fully comply with the newly enacted Tenn. Code Ann. § 65-5-126.

5. Additional investigation and discovery will be needed to determine whether Piedmont's proposal is appropriate and effective.

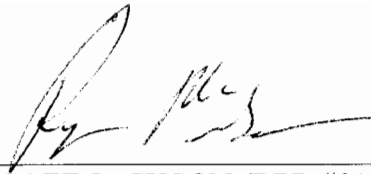
6. Only by participating in this proceeding can the Consumer Advocate work adequately to protect the interests of consumers.

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

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read "R. E. Cooper, Jr.", written over a horizontal line.

ROBERT E. COOPER, JR. (BPR #010934)
Attorney General and Reporter
State of Tennessee



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Dated: December 7, 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:

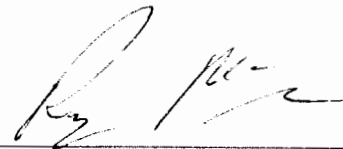
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This the 7 day of December, 2009.



C. Scott Jackson