RECEIVED

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:

T.R.A. DOCKET ROOM

PETITION OF CHATTANOOGA GAS * DOCKET NO. 09-00183 COMPANY FOR APPROVAL OF *

ADJUSTMENT OF ITS RATES AND

*
CHARGES MODIFICATION OF ITS

*

RATE DESIGN AND REVISED TARIFF

PETITION OF THE CHATTANOOGA MANUFACTURERS ASSOCIATION FOR LEAVE TO INTERVENE

The Chattanooga Manufacturers Association (hereinafter "CMA"), by and through its counsel, pursuant to T.C.A. §4-5-310(a) respectfully petitions to intervene as a matter of right in this docket. In support of its petition, CMA states as follows:

- 1. The Chattanooga Manufacturers Association is a one-hundred year old trade association representing over 250 manufacturers and other businesses supporting, servicing and associated with the manufacturing sector, many of whom are customers of Chattanooga Gas Company (the "Company"). CMA has a legal interest in the outcome of this docket, and desires to intervene in order to fully protect the interests of its members.
- 2. The Authority previously has granted CMA intervention status in Company cases including, but not limited to, the Company's 2004 and 2006 rate proceedings.
- 3. In the present docket, the Company seeks approval by the Authority to adjust certain rates and charges, including increases or changes that may aversely affect CMA ratepayers.
- 4. Granting this Petition will not impair the orderly and prompt conduct of this proceeding.

5. If this Petition to Intervene is granted, CMA asks that a complete copy of the Company's Petition and all notices, correspondence and copies of orders and other materials be served upon CMA's attorney:

Henry M. Walker, Esq.
Bradley Arant Boult Cummings LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37203
615-252-2363 (Phone)
615-252-6363 (Fax)
hwalker@babc.com

WHEREFORE, the Chattanooga Manufacturers Association respectfully requests that the Authority enter an Order granting this Petition to Intervene.

Respectfully submitted this 11th day of December, 2009.

BRADLEY ARANT BOULT CUMMINGS, LLP

By:

Henry M. Walker, Esq.

1600 Division Street, Suite 700 Nashville, Tennessee 37203

615-252-2363

CERTIFICATE OF SERVICE

I hereby certify that I have on this 11th day of December, 2009 served the foregoing Petition of the Chattanooga Manufacturers Association for Leave to Intervene either by fax, overnight deliver service or first class mail, postage prepaid, to all parties of record at their addresses shown below:

J.W. Luna, Esq. 333 Union Street, Suite 300 Nashville, Tennessee 37201

Cynthia Kinzer
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202

Henry M. Walker

2265512 v1 104599-001