## IN THE TENNESSEE REGULATORY AUTHORITY AT NASHVILLE, TENNESSEE

IN RE:	)	
	)	
APPLICATION OF PIEDMONT	)	DOCKET NO. 10-00142
NATURAL GAS COMPANY, INC. FOR	)	
APPROVAL OF NEGOTIATED GAS	)	
REDELIVERY AGREEMENT WITH E. I.	)	
DUPONT DE NEMOURS COMPANY	)	

## 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 ("TRA" or "Authority") to grant the Consumer Advocate's intervention into this proceeding on behalf of the public interest. 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. Piedmont Natural Gas Company, Inc. ("Piedmont") is a public utility regulated by the Authority and distributes natural gas to consumers located in Nashville and the remainder of Davidson County, as well as portions of the adjoining counties of Cheatham, Dickson, Robertson, Rutherford, Sumner, Trousdale, Williamson, and Wilson and in certain incorporated towns and cities located therein.

3. On July 13, 2010, Piedmont filed in the Authority an Application to approve a negotiated Gas Redelivery Agreement with E. I. du Pont de Nemours Company ("DuPont"), including the rates set forth therein.

4. Additional investigation and discovery may be needed to determine whether the Gas Redelivery Agreement is reasonable in its terms and is in the best interest of Tennessee consumers.

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 grant the Petition to Intervene.

RESPECTFULLY SUBMITTED,

ROBERT E. COOPER, JR. (BPR #10934)

Attorney General and Reporter

State of Tennessee

MARY LEIGH WHOTE (BPR #26659)

Assistant Attorney General

Office of the Attorney General

Consumer Advocate and Protection Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 741-4657 Fax: (615)-741-1026

Dated: July 2, 2010.

## **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:

Jane Lewis-Raymond Vice President & General Counsel Piedmont Natural Gas Company, Inc. P.O. Box 33068 Charlotte, NC 28233

R. Dale Grimes Bass, Berry & Sims PLC 150 Third Avenue South, Suite 2800 Nashville, TN 37201

James H. Jeffries IV Moore & Van Allen PLLC 100 North Tryon Street, Suite 4700 Charlotte, NC 28202

Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

This the 2 day of 2010.

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