

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

IN RE:

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PETITION OF TENNESSEE-
AMERICAN WATER COMPANY TO
CHANGE AND INCREASE CERTAIN
RATES AND CHARGES

DOCKET NO. 10-00189

**PETITION TO INTERVENE BY THE
CHATTANOOGA MANUFACTURERS ASSOCIATION**

Comes the Chattanooga Manufacturers Association (hereinafter “CMA”), by and through its counsel, pursuant to Tenn. Code Ann. § 4-5-310 and Rule 1220-1-2-.08 of the Tennessee Regulatory Authority (“the Authority”), and respectfully petitions to intervene in this docket as a party of record. In support of its petition to intervene, CMA states as follows:

1. CMA is a one-hundred-eight (108) year old trade association in Chattanooga consisting of approximately 250 manufacturers and businesses supporting and servicing the local area’s manufacturing sector. CMA has substantial and vital interests in the outcome of the Authority’s action in this docket and, among other things, desires to intervene in order to protect such interests on behalf of its members and those similarly situated.

2. The Authority previously has granted CMA intervention status in similar utility rate-making cases. This is a contested case as it involves the Company’s request to once again raise rates by double-digit percentages and involves the fixing of rates by the Authority. Given the issues raised by the Company’s filing, CMA and its members’ legal rights, duties, immunities, or other legal interests may be determined in this proceeding and presently are not, or may not be, adequately represented by another party in this docket.

3. In the present docket, the Company seeks approval by the Authority to again increase certain rates and charges and follows numerous recent requests for rate increases. The

Company's current petition seeks a 27.66% increase in revenue (almost \$10 million annually) and will adversely affect ratepayers including but not limited to CMA, its members and others similarly situated. The Authority entered an Order in 2009 rejecting the nearly twenty-one percent (21%) revenue increase (\$7.645 million annually) the Company sought and allowed only a slight increase in rates, which the Company has appealed.

4. CMA avers that the Company's present request seeking to increase rates is not fair, not reasonable, and not in the best interests of CMA or its members and other ratepayers, and should be rejected by the Authority. Accordingly, CMA requests to intervene and participate in this case pending the Authority's rejection, modification or approval of the petition presently filed by the Company before the Authority.

5. Granting CMA's petition to intervene will not impair the interests of justice or the orderly conduct of these proceedings. If this Petition to Intervene is granted, all notices, correspondence, pleadings, copies of orders and other materials should be addressed to CMA's counsel as follows:

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-and-

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WHEREFORE, the Chattanooga Manufacturers Association respectfully requests that the Authority grant this Petition to Intervene and enter an Order allowing the CMA to become an intervening party of record in this docket.

Respectfully submitted this 4th day of October, 2010.

GRANT, KONVALINKA & HARRISON, P.C.

By: 

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*Attorneys for the
Chattanooga Manufacturers Association*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been served either by hand-delivery, facsimile, overnight delivery service, or first class mail, postage prepaid, to all parties of record at their addresses shown below:

R. Dale Grimes, Esq.
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Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
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This 4th day of October, 2010.



GRANT, KONVALINKA & HARRISON, P.C.