

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In Re:

Petition of Tennessee American Water
Company to Change and Increase
Certain Rates and Charges so as to
Permit it to Earn a Fair and Adequate
Rate of Return on Its Property Used
and Useful in Furnishing Water
Service to Its Customers

Docket No. 10-00189

**PETITION TO INTERVENE OF THE UTILITY
WORKERS UNION OF AMERICA, AFL-CIO AND
UWUA LOCAL 121**

On September 23, 2010, the Tennessee American Water Company ("TAWC" or "Company") initiated the instant proceeding by filing for Tennessee Regulatory Authority ("Authority") approval of a 26.77% increase in water service rates. Pursuant to T.C.A. §§ 4-5-310 and 65-2-107 and Tenn. Comp. R. & Regs. R. 1220-1-2-.08, the Utility Workers Union of America, AFL-CIO, ("UWUA") and UWUA Local 121 (referred to collectively as "UWUA"), hereby respectfully petitions for leave to intervene in this docket with rights as a party to the proceeding. As explained immediately below, this request should be granted because the petitioner UWUA's legal rights, duties, privileges, immunities, or other legal interests may be affected by the Company's Application in this proceeding.

In support of these requests, UWUA states as follows:

1. All notices, correspondence, pleadings, and other communications concerning this proceeding should be sent to the attention of UWUA counsel, as follows:

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2. This is a contested case within the meaning of T.C.A. § 65-2-101(2) as it involves the fixing of rates. TAWC is a Tennessee corporation regulated by the Authority that provides water services within the state of Tennessee.

3. UWUA is a national labor organization representing approximately 55,000 workers primarily in electric, gas, and water industries across the United States. UWUA has participated in proceedings before state utility commissions throughout the Nation, including those involving water utility rates. UWUA Local 121 represents 70 TAWC employees who perform a variety of jobs essential to the delivery to customers of high quality and safe water services, including field service representative, truck driver/utility, heavy equipment operator, laborer relief/process tech, and master maintenance mechanic. The members of UWUA Local 121 constitute a significant portion of the Company's 103-employee workforce. Many -- if not most -- of those employees are also customers of TAWC.

4. UWUA seeks to intervene in its case to protect the legal interests of its members who are employees of TAWC. As the representative of a large portion of the Company's workforce, UWUA has a substantial interest in ensuring that the Company is

* A Motion for Pro Hac Vice Admission for these counsel is being filed contemporaneously with this Petition to Intervene.

permitted to charge just and reasonable rates -- *i.e.* those that will permit, among other things, the TAWC workforce to perform their essential functions in an appropriate manner. At the same time, the UWUA is concerned that TAWC fulfill its obligation to use those dollars that it is authorized to collect from customers in a manner that is consistent with the provision of safe, reliable, and high quality utility service. For example, notwithstanding that extraordinary size of the proposed increase, UWUA is concerned that the Company remains unwilling to address a central problem impeding its ability to deliver reliable and high quality water services to customers: the lack of an adequate complement of hourly staff.

5. UWUA anticipates that its presence in this proceeding will assist the Commission by providing an understanding of the extent to which rate relief should be focused on meeting the Company's staffing needs which, and, by extension, should provide tangible benefits to TAWC customers. The UWUA is uniquely positioned to address the staffing needs and practices of the Company, including both whether current staffing levels are adequate and whether the present staffing complement is being utilized in an effective manner calculated to promote the delivery of safe and reliable service. As such, it can assist the Authority in (a) determining whether the rates proposed by the Company are "just and reasonable" and (b) conducting required inquiry into "the safety, adequacy and efficiency or lack thereof of the service or services furnished by" the Company. T.C.A. § 65-5-101(a).

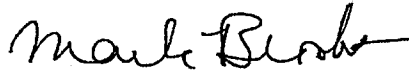
6. Granting UWUA's petition to intervene will not impair the interests of justice or the orderly conduct of these proceedings. Nor is it duplicative, as no other party has sought to intervene to represent the unique interests of the UWUA members.

UWUA and UWUA Local 121 will, of course, coordinate their participation to avoid unnecessary complication or duplication.

CONCLUSION

WHEREFORE, for the foregoing reasons, UWUA and UWUA Local 121 request that this petition to intervene with full rights as a party to this proceeding be granted.

Respectfully submitted,



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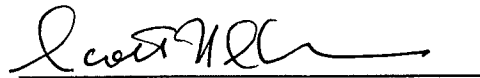
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Attorneys for Utility Workers Union of
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Oct. 14, 2010

CERTIFICATE OF SERVICE

I, Scott H. Strauss, counsel for UWUA Intervenors, hereby certify that on the 14th day of October, 2010, I caused a copy of the foregoing Motion to Intervene to be served upon all parties of record by postage prepaid, first-class, U.S. mail.

A handwritten signature in black ink, appearing to read "Scott H. Strauss", is written over a horizontal line.

Scott H. Strauss