,2011

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:	)	
PETITION OF INTEGRATED	)	Docket No. 11-00059
RESOURCE MANAGEMENT, INC.	)	
d/b/a/ IRM UTILITY, INC. TO AMEND	)	
ITS CERTIFICATE OF PUBLIC	)	
CONVENIENCE AND NECESSITY	)	
TO SERVE AN AREA IN WILLIAMSO	N)	
COUNTY, TENNESSEE KNOWN AS	)	
ARRINGTON VINEYARDS	)	

May

## PETITION TO INTERVENE OF TENNESSEE WASTEWATER SYSTEMS, INC.

Tennessee Wastewater Systems, Inc. ("TWS"), petitions the Tennessee Regulatory Authority ("TRA"), pursuant to Tennessee Code Annotated § 4-5-310(a), to allow TWS to intervene as a matter of right in the above-captioned Petition of Integrated Resource Management, Inc., d/b/a/ IRM Utility, Inc. ("IRM"), to Amend its Certificate of Public Convenience and Necessity to Serve an Area in Williamson County, Tennessee known as Arrington Vineyards. In support of this Petition, TWS submits that:

- 1. TWS currently has a CCN to serve the area where Arrington Vineyards, the customer identified by IRM, is located. See Docket No. 97-01393, March 31, 1998. TWS has facilities located approximately one and one-half miles from Arrington Vineyards and is prepared to meet the reasonable needs of the customer for wastewater service. See T.C.A. §65-4-203(a).
- 2. TWS did not receive notice of the filing of this Petition. See T.C.A. §65-4-203(b).

3. The outcome of the above-captioned proceeding will have a direct impact on the rights, duties, privileges, immunities, or other legal interests of TWS. Moreover, granting this Petition to Intervene is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

Therefore, TWS respectfully requests that the TRA grant its Petition to Intervene.

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS, LLP

By:

Henry Walker 1600 Division Street, Suite 700

Nashville, Tennessee 37219

(615) 252-2363

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document has been served upon the following persons by hand delivery or by United States Mail, with proper postage thereon.

C. Corum Webb Farris Mathews Branan Bobango Hellen & Dunlap PLC 618 Church Street, Suite 300 Nashville, TN 37219

This  $\frac{1}{4}$  day of May, 2011.

Henry Walker