

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF NAVITAS TN NG, LLC
FOR EMERGENCY RELIEF**

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DOCKET NO. 11-00060

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 because consumers may be adversely affected. 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. Navitas TN NG, LLC ("Navitas") is a public utility regulated by the Authority and provides natural gas services to consumers located in the State of Tennessee.

3. On April 20, 2011, Navitas filed a petition for emergency relief seeking to adjust the rates and rate design currently in effect without a rate case.

4. The Consumer Advocate seeks intervention in this matter to investigate the need for the relief sought by Navitas and the potential impact on Tennessee consumers under Navitas's proposal.

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 #010934)
Attorney General and Reporter
State of Tennessee



RYAN L. MCGEHEE (BPR #025559)
Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
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Dated: May 5, 2011.

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:

John Knox Walkup, Esq.
Klint Alexander, Esq.
Wyatt, Tarrant & Combs, LLP
2525 West End Avenue
Suite 1500
Nashville, TN 37203

Thomas Hartline
Navitas Utility Corporation
18218 East McDermott, Suite I
Irvine, CA 92614

This the 5 day of May, 2011.



Ryan L. McGehee