

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

IN RE:)	
)	
COMPLAINT OF CONOCOPHILLIPS)	DOCKET NO. 11-00210
COMPANY FOR AN ORDER)	
DETERMINING CONOCOPHILLIPS NOT)	
LIABLE FOR PENALTIES AND CHARGES)	
ASSESSED BY CHATTANOOGA GAS)	
COMPANY, OR, IN THE ALTERNATIVE)	
PETITION FOR SPECIAL RELIEF)	

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. Chattanooga Gas Company ("CGC") is a public utility regulated by the Authority and provides natural gas services to consumers located in the State of Tennessee.
3. ConocoPhillips Company ("ConocoPhillips") is a business entity that serves as a third party gas supplier for Invista Inc., a CGC customer.

4. In December of 2010 and parts of January of 2011, ConocoPhillips apparently did not deliver, or failed to arrange to deliver, natural gas at the appropriate pipeline delivery point for CGC to utilize pursuant to the terms of the Third Party Supplier ("TPS") tariff. CGC imposed penalties pursuant to the TPS tariff.

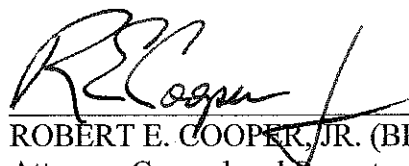
5. On December 20, 2011, ConocoPhillips filed a complaint with the Authority concerning the penalties imposed by CGC for failure to supply natural gas pursuant to an Authority approved tariff. ConocoPhillips is requesting relief from the penalties imposed by CGC.

6. The penalties imposed by CGC are not treated as revenue, but rather passed onto consumers in the form of lower natural gas prices. Any relief granted to ConocoPhillips may affect the rates paid by the businesses and households served by CGC.

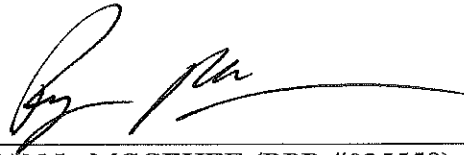
7. Only by participating in this proceeding can the Consumer Advocate work adequately to protect consumers.

WHEREFORE, Petitioner respectfully asks the Authority to grant the Petition to Intervene.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read "R. E. Cooper, Jr.", is written over a horizontal line.

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
P.O. Box 20207
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(615) 532-5512

Dated: March ¹²__, 2012.

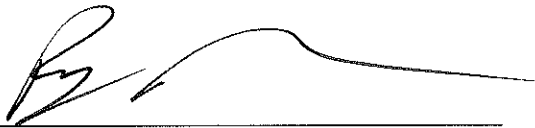
CERTIFICATE OF SERVICE

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:

J.W. Luna, Esq.
Jennifer Brundige, Esq.
Farmer & Luna
333 Union Street
Suite 300
Nashville, TN 37201

Archie R. Hickerson
Director-Regulatory Affairs
AGL Services Company
150 West Main Street
Suite 1510
Norfolk, VA 23510

This the 12 day of March, 2012.



Ryan L. McGehee