

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

IN RE:)	
PETITION OF LAUREL HILLS)	
CONDOMINIUMS PROPERTY OWNERS)	DOCKET NO. 12-00030
ASSOCIATION FOR A CERTIFICATE)	
OF PUBLIC CONVENIENCE AND)	
NECESSITY)	

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. 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. Laurel Hills Condominium Property Owners Association, Inc. ("Laurel Hills") owns and operates a small water distribution system in Cumberland County, Tennessee within the development known as Renegade Mountain. Laurel Hills is the property owners association for the timeshare units of the Laurel Hills timeshare condominium complex.

3. On April 10, 2012, Laurel Hills filed the Petition in this Docket asking that the TRA grant it a Certificate of Public Convenience and Necessity ("CCN") to operate its water distribution system.

4. On May 1, 2012 a group of the water customers of Laurel Hills who are not members of Laurel Hills filed a Petition to Intervene in this Docket alleging, among other things, that their water service had been interrupted and that the Petition of Laurel Hills contained inaccuracies.

5. Laurel Hills responded on May 7, 2012 by submitting a Notice of Voluntary Dismissal and Withdrawal wherein it announced that it would cease to provide water service to anyone other than its members on July 9, 2012 and that it believed that it was therefore no longer dedicated to the public use and did not need to be issued a CCN by the TRA.

6. At its May 21, 2012 Authority Conference, the TRA appointed a Hearing Officer to determine whether a show cause proceeding should be initiated against Laurel Hills and authorized the TRA Investigative Staff to take any necessary measures, including filing for injunctive relief, in order to maintain water services.

7. The propriety of a water service provider unilaterally terminating service to a group of its customers for reasons other than for non-payment of lawfully imposed fees and tariffs are of concern to all utility consumers and to the Consumer Advocate.

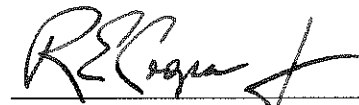
8. Additionally, the legal and policy issues surrounding the TRA's ability to regulate utilities organized as not-for-profit entities is of concern to all utility customers and to the Consumer Advocate.

9. The issues raised by the Petitions and other pleadings filed in this Docket raise these and other questions, the resolution of which affect the interests of not only the customers of Laurel Hills, but all customers of Tennessee utilities generally.

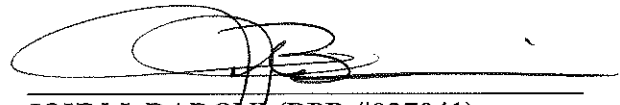
10. Only by participating in this proceeding can the Consumer Advocate work adequately to protect the interests of consumers.

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



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Dated: 6/27/12.

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:

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This the 28th day of June, 2012.



JOHN J. BARONI