BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE: *

PETITION OF TENNESSEE-AMERICAN WATER COMPANY TO

CHANGE AND INCREASE CERTAIN

RATES AND CHARGES

DOCKET NO. 12-00049

PETITION TO INTERVENE BY THE CHATTANOOGA REGIONAL MANUFACTURERS ASSOCIATION

Comes the Chattanooga Regional Manufacturers Association (hereinafter "CRMA"), by and through its counsel, pursuant to Tenn. Code Ann. § 4-5-310 and Rule 1220-1-2-.08 of the Tennessee Regulatory Authority ("the Authority"), and respectfully petitions to intervene in this docket as a party of record. In support of its petition to intervene, CRMA states as follows:

- CRMA is a one-hundred-ten (110) year old trade association in Chattanooga 1. consisting of approximately 250 manufacturers and businesses supporting and servicing the local area's manufacturing sector. CRMA has substantial and vital interests in the outcome of the Authority's action in this docket and, among other things, desires to intervene in order to protect such interests on behalf of its members and those similarly situated.
- The Authority previously has granted CRMA intervention status in similar utility 2. rate-making cases. This is a contested case which involves the Company's request to again raise rates by double-digit percentages and involves the fixing of rates by the Authority. Given the issues raised by the Company's filing, CRMA and its members' legal rights, duties, immunities, or other legal interests may be determined in this proceeding and presently are not, or may not be, adequately represented by another party in this docket.
- In the present docket, the Company seeks approval by the Authority to again 3. increase certain rates and charges and follows numerous recent requests for rate increases. The

Company's current petition also seeks certain charges and trackers that shift risk away from the Company and its shareholders while contemporaneously seeking to increase the Company's return on equity.

- 4. CRMA avers that the Company's present request and proposed design to increase rates will adversely affect ratepayers, is not fair, not reasonable, and not in the best interests of CRMA or its members and other ratepayers. Unless modified, the Petition should be rejected by the Authority. Accordingly, CRMA requests to intervene and participate in this case pending the Authority's rejection, modification or approval of the petition presently filed by the Company before the Authority.
- 5. Granting CRMA's petition to intervene will not impair the interests of justice or the orderly conduct of these proceedings. If this Petition to Intervene is granted, all notices, correspondence, pleadings, copies of orders and other materials should be addressed to CRMA's counsel as follows:

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WHEREFORE, the Chattanooga Regional Manufacturers Association respectfully requests that the Authority grant this Petition to Intervene and enter an Order allowing the CRMA to become an intervening party of record in this docket.

Respectfully submitted this 24th day of August, 2012.

GRANT, KONVALINKA & HARRISON, P.C.

By:

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Attorneys for the Chattanooga Regional Manufacturers Association

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been served either by hand-delivery, facsimile, overnight delivery service, or first class mail, postage prepaid, to all parties of record at their addresses shown below:

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his /

day of August, 2012.

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4

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