

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

IN RE:

**PETITION OF NAVITAS TN NG, LLC
FOR AN ADJUSTMENT TO ITS NATURAL
GAS RATES AND APPROVAL OF REVISED
TARIFFS**

)
)
)
)
)
)

DOCKET NO. 12-00068

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 July 2, 2012, Navitas filed a petition for seeking to adjust its rates by maintaining the current flat monthly customer charge of \$6.00 on all customers. In addition, Navitas proposes to increase the surcharge on the first nine CCF from \$0.25 to \$1.00 per unit.

Navitas also proposes to increase the flow charge from \$0.40 per CCF residential and \$0.30 per CCF industrial to \$0.585/CCF and \$0.485/CCF respectively.

4. The Consumer Advocate seeks intervention in this matter to investigate the need for adjustment of its rates sought by Navitas and the potential impact on Tennessee consumers.

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 #25559)
Assistant Attorney General
John J. Baroni (BPR #27041)
Assistant Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 741-8733
(615) 741-1026 - FAX

Dated: July 5th, 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:


Jean Stone, General Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243
jean.stone@tn.gov

Klint W. Alexander, Esq.
Wyatt, Tarrant & Combs, LLP
2525 West End Avenue
Suite 1500
Nashville, TN 37203
(615) 244-0020
kalexander@wyattfirm.com

Ron Comingdeer, Esq.
Mary Kathryn Kunc, Esq.
Ron Comingdeer & Associates
6011 N. Robinson
Oklahoma City, OK 73118
(405) 848-5534
hunter@comingdeerlaw.com
mkkunc@comingdeer.com

Thomas Hartline
Navitas Utility Corporation
3186 – D Airway Avenue
Costa Mesa, CA 92626

This the 5th day of July, 2012.



Ryan L. McGehee