

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

IN RE:

**PETITION OF EMERSON PROPERTIES,
LLC FOR DECLARATORY RULING**

DOCKET NO. 13-00017

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 for purposes of notice and service in 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. Emerson Properties, LLC ("Emerson") purchased The Villages at Norris Lake ("The Villages") from the bankrupt debtor The Villages at Norris Lake, LLC through a bankruptcy proceeding.

3. Tennessee Wastewater Systems, Inc. ("TWSI") had contracted to provide wastewater systems for The Villages and obtained a State Operating Permit from the Tennessee Department of Environment and Conservation ("TDEC") for The Villages subdivision. TWSI

also obtained a Certificate of Public Convenience and Necessity ("CCN"), as shown in the April 11, 2007 Order of TRA Docket No. 06-00277.

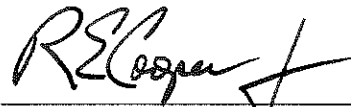
4. On March 1, 2013, Emerson filed its amended Petition requesting the TRA to cancel or terminate TWSI's CCN for the property Emerson now owns as a result of the bankruptcy.

5. The procedures related to CCNs, including but not limited to cancelling or terminating CCNs, may affect ratepayers in the future.

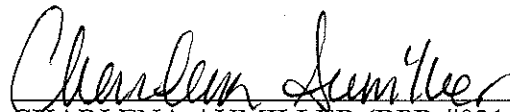
6. Only by receiving notice and service in this proceeding can the Consumer Advocate monitor and work adequately to protect the interest of consumers.

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: _____

CERTIFICATE OF SERVICE

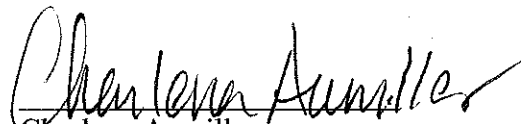
I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail or electronic mail upon:

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This the 15th day of March, 2013.


Charlena Aumiller