

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

IN RE:)	
)	
PETITION OF TENNESSEE AMERICAN)	
WATER COMPANY FOR APPROVAL OF A)	
QUALIFIED INFRASTRUCTURE INVEST-)	
MENT PROGRAM, AN ECONOMIC)	
DEVELOPMENT INVESTMENT RIDER,)	DOCKET NO. 13-00130
A SAFETY AND ENVIRONMENTAL)	
COMPLIANCE RIDER, AND PASS-)	
THROUGHS FOR PURCHASED POWER,)	
CHEMICALS, PURCHASED WATER,)	
WHEELING WATER COSTS, WASTE)	
DISPOSAL, AND TRA INSPECTION FEE)	

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") for an order convening a contested case and granting the Consumer Advocate's intervention into this proceeding on behalf of consumers and the public interest, because the Qualified Infrastructure Investment Program; Economic Development Investment Rider; Safety and Environmental Compliance Rider; and Pass-Throughs for Purchased Power, Chemicals, Purchased Water, Wheeling Water Costs, Waste Disposal, and TRA Inspection Fee proposed by Tennessee American Water Company ("Tennessee American") may affect the interests of consumers.

The Consumer Advocate states the following additional grounds in support of this Petition to Intervene:

1. Tennessee American is a public utility regulated by the Authority. It provides water utilities services to consumers located in the State of Tennessee.

2. Tennessee American has filed a petition pursuant to Tenn. Code Ann. § 65-5-103(d) requesting to adjust the rates it charges consumers for water utilities services through implementation of the following new alternative regulatory methods: (a) a Qualified Infrastructure Investment Program; (b) an Economic Development Investment Rider; (c) a Safety and Environmental Compliance Rider; and (d) Pass-Throughs for Purchased Power, Chemicals, Purchased Water, Wheeling Water Costs, Waste Disposal, and TRA Inspection Fee.

3. Prior to approval under Tenn. Code Ann. § 65-5-103(d), the Authority must find that the alternative regulatory methods proposed by Tennessee American are in the public interest.

4. If approved, the alternative regulatory methods proposed by Tennessee American will affect the rates that consumers pay for water utilities services in Tennessee. Thus, consumers' legal rights, duties, and interests may be determined in this proceeding.

5. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utilities services by participating or intervening as a party in any matter or proceeding before the Authority and initiate such proceeding in accordance with the Uniform Administrative Procedures Act and Authority rules. The Consumer Advocate, therefore, may participate in this docket on behalf of Tennessee consumers, and it qualifies under the law as an intervenor in this proceeding.

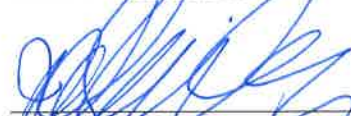
6. Only by participating as a party to this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

Wherefore, the Consumer Advocate requests 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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CERTIFICATE OF SERVICE

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

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This the 17th day of October, 2013.



JOE SHIRLEY