

BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN RE:)	
APPLICATION OF B&W PIPELINE,)	
LLC FOR A CERTIFICATE OF)	DOCKET NO. 13-00151
CONVENIENCE AND NECESSITY)	
TO OPERATE A NATURAL GAS)	
PIPELINE SYSTEM IN PICKETT,)	
MORGAN, & FENTRESS COUNTIES)	
)	

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 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. B&W Pipeline, LLC ("B&W") owns and operates a small natural gas distribution pipeline system in the counties of Pickett, Morgan, and Fentress, Tennessee.

3. On December 9, 2013, B&W filed its Petition in this Docket asking that the TRA grant it a Certificate of Public Convenience and Necessity ("CCN") to operate its natural gas pipeline.

4. At its February 3, 2014 Authority Conference, the TRA appointed a Hearing Officer and convened a contested case for B&W's Petition for a CCN.


5. Given the fact that B&W has been doing business without a CCN raises questions that warrant intervention by the Consumer Advocate. In addition, the Petition for the CCN states that B&W intends to "transfer" its 7 residential customers to Navitas TN NG, LLC. Thus, only by participating in this proceeding can the Consumer Advocate work adequately to protect the public interest and 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



VANCE L. BROEMEL (BPR #011421)
Senior Counsel
Office of the Tennessee Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 741-8733


Dated: February 27th, 2014.

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:

Henry Walker, Esq.
Bradley Arant Boult
Cummings, LLP
1600 Division St., Suite 700
Nashville, TN 37203

This the 28th day of February, 2014.


VANCE L. BROEMEL