

IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

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2014 DEC -9 PM 3:05

IN RE:)
JOINT REQUEST OF CHATTANOOGA)
GAS COMPANY AND VOLKSWAGEN)
GROUP OF AMERICA CHATTANOOGA)
OPERATIONS, LLC FOR APPROVAL)
OF SPECIAL CONTRACT)

T.R.A. DOCKET ROOM

Docket No. 14-00118

PETITION TO INTERVENE

Herbert H. Slatery III, 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 because consumers' interests, rights, duties or privileges may be determined or affected by the proceeding. For cause, the 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 participating or intervening as a party in any matter or proceeding before the Authority or initiating such proceeding in accordance with the Uniform Administrative Procedures Act ("UAPA"), Tenn. Code Ann. § 4-5-101 *et seq.*, and Authority rules.

2. Chattanooga Gas Company ("CGC" or "Company") is a public utility regulated by the Authority and provides natural gas utilities services to consumers

in the State of Tennessee.

3. On October 23, 2014, CGC and Volkswagen Group of America Chattanooga Operations, LLC (“Volkswagen”) filed with the Authority a Joint Request for Approval of Special Contract (“Joint Request”).

4. TRA Rule 1220-4-1-.07 allows a public utility and a specific customer to enter into an agreement setting rates and services not covered or permitted in the utility’s general tariff (“Special Contract”). These Special Contracts allow the specific customer to receive terms and conditions for utility services that are not available to other customers. Special Contracts require review and approval by the TRA.

5. The Special Contract as filed has been redacted to remove confidential material which can be reviewed only after a party has signed a protective order. It is anticipated that in order to obtain TRA approval of the Special Contract at issue in this case, CGC and/or Volkswagen will file additional confidential information in response to a TRA Staff data request dated November 24, 2014.

6. In order to review confidential information in this case, the Consumer Advocate must intervene and sign a protective order that ensures confidential information will be protected.

7. According to the Joint Request, the Company’s other customers will not be adversely affected by the approval of the Special Contract. However, the Joint Request does not specify how consumers may or may not be affected. Accordingly, the Consumer Advocate must intervene into this proceeding in order to

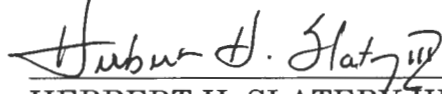
have the opportunity to fully review the filings in this docket to ensure the interests of consumers are adequately protected.

8. The Consumer Advocate appreciates the potential for economic development offered by this Special Contract between CGC and Volkswagen and notes that the TRA would like to resolve this matter in a timely manner. The Consumer Advocate will therefore comply with all procedural schedules and guidelines issued by the Authority.

9. 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 of public utilities services.

Wherefore, the Consumer Advocate requests the Authority to grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,



HERBERT H. SLATTERY III (BPR #09077)
Attorney General and Reporter
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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 9th day of December, 2014.



Rachel A. Newton