

IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

IN RE:)	
)	
PETITION OF TENNESSEE-AMERICAN)	
WATER COMPANY REGARDING THE)	Docket No. 14-00121
2015 INVESTMENT AND RELATED)	
EXPENSES UNDER THE QUALIFIED)	
INFRASTRUCTURE INVESTMENT)	
PROGRAM RIDER, THE ECONOMIC)	
DEVELOPMENT INVESTMENT RIDER,)	
AND THE SAFETY AND ENVIRONMENTAL)	
COMPLIANCE RIDER)	

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 affected by the Petition of Tennessee-American Water Company, Inc. ("Tennessee-American" or "Company").

For cause, the Consumer Advocate would show as follows:

1. Tennessee-American is a public utility regulated by the Authority. It provides water utility services to consumers located in the State of Tennessee.
2. The filing by Tennessee-American is a follow-up to a set of tariffs approved by the TRA on April 14, 2014 in Docket No. 13-00130. The Consumer Advocate intervened in Docket No. 13-00130 and after extensive negotiating and

discovery entered into a stipulation with Tennessee-American on January 10, 2014, which formed part of the basis of the approval by the TRA. These tariffs were approved under the recently passed “alternative ratemaking” statute, Tenn. Code Ann. § 65-5-103 *et seq.*


3. The present filing details the expenses Tennessee-American will be seeking to recover starting January 1, 2015. More specifically, the Company will be seeking to recover expenses under the following tariffs: the Qualified Infrastructure Investment Program Rider (“QIIP”), an Economic Development Investment Rider (“EDI”), and a Safety and Environmental Compliance Rider (“SEC”).

4. 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.

5. 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,



HERBERT H. SLATTERY III. (BPR No.09077)
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 26th day of November, 2014.


VANCE L. BROEMEL