IN THE TENNESSEE REGULATORY AUTHORITY AT NASHVILLE, TENNESSEE

IN RE:)	
)	
PETITION OF TENNESSEE)	
WASTEWATER SYSTEMS, INC. FOR)	DOCKET NO. 14-00136
APPROVAL OF CAPITAL)	
IMPROVEMENT SURCHARGES)	
AND FINANCING ARRANGEMENTS)	

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, 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 ("UAPA"), Tenn. Code Ann. § 4-5-101 et seq., and Authority rules.

- 2. Tennessee Wastewater Systems, Inc., ("TWSI" or "Company") is a public utility regulated by the Authority. It provides wastewater utility services to consumers located in the state of Tennessee.
- 3. TWSI has requested permission to charge a one-time assessment of \$330,000 to owners of property in Summit View Resorts for a capital project. The assessments would be allocated based on the square footage of the property and would range from \$5,875.20 to \$21,774.96.
- 4. TWSI has also requested that the TRA approve a loan of up to \$725,000 to finance capital projects for three (3) wastewater treatment facilities. According to the Company's petition, the loan will be repaid by TWSI's customers via a monthly surcharge of \$3.27 over a ten (10) year period.
- 5. The loan, if approved, will increase monthly rates paid by TWSI customers. The assessments, if approved, will create significant expenses for the Company's customers in Summit View Resorts. Therefore, the interests of consumers are directly involved.
- 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,

HERBERT H. SLATERY III (BPR #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:

Henry Walker, Esq. Bradley Arant Boult Cummings, LLP 1600 Division Street, Suite 700 Nashville, TN 37203 615-252-2363

This the 8 day of Dec, 2014.

Rachel A. Newton