

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

<b>IN RE:</b>	)	
	)	
<b>PETITION OF TENNESSEE WASTEWATER SYSTEMS, INC., FOR APPROVAL OF LOANS</b>	) ) ) ) )	<b>DOCKET NO. 15-00071</b>

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**PETITION TO INTERVENE**

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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”) is a public utility regulated by the Authority. It provides wastewater utility services to consumers located in the state of Tennessee.

3. In its *Petition for Approval of Financing Arrangements* (“*Petition*”), filed August 8, 2015, in Docket 15-00071, TWSI has requested that the TRA approve the following financing arrangements, totaling new debt obligations of \$221,171.30:

- A loan to TWSI from Wilson Bank and Trust for \$75,796.47

- A loan to TWSI from First Bank for \$72,780.00
- A loan to TWSI from First Bank for \$34,122.33
- A promissory note from TWSI to private land sellers for \$38,472.50

*Petition* at 1, Attachments B, C, D.

4. The loans from Wilson Bank and Trust and First Bank will be used to purchase trucks and excavators that TWSI claims are “necessary for the system operators to perform their operational and maintenance duties.” These loans are secured by the purchased equipment and personal guarantees. *Petition* at 1.

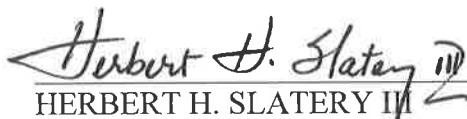
5. TWSI issued the promissory note in exchange for land at Dyers Hollow that it claims is “necessary for a drip field ... which is required per new state regulations.” The promissory note is secured by the purchased land. *Petition* at 1.

6. Consumers may ultimately bear the burden of these loans through increased rates; therefore, consumers’ interests are directly involved.

7. 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 respectfully requests the Authority to grant the *Petition to Intervene*.

RESPECTFULLY SUBMITTED,

  
HERBERT H. SLATTERY III  
Attorney General and Reporter

*Erin Merrick*

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Dated: 8/21/15, 2015.

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 20 day of Aug, 2015.

  
Erin Merrick