

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

IN RE:

**PETITION OF INTEGRA WATER
TENNESSEE, LLC FOR A
CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY
AND AUTHORITY TO CHARGE
RATES IN CASEY COVE
SUBDIVISION LOCATED IN
DEKALB COUNTY, TENNESSEE**

DOCKET NO. 17-00014

PETITION TO INTERVENE

Herbert H. Slatery III, Attorney General and Reporter for the State of Tennessee, by and through the Consumer Protection and Advocate Division of the Office of the Attorney General (Consumer Advocate), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Regulatory Authority (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 *Petition of Integra Water Tennessee, LLC for a Certificate of Public Convenience and Necessity and Authority to Charge Rates in Casey Cove Subdivision Located in Dekalb County, Tennessee (Petition)* filed in this TRA Docket by Integra Water Tennessee, LLC (Utility). For cause, the Consumer Advocate 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 any matter or proceeding before the Authority in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. § 4-5-101 *et seq.*, and Authority rules.

2. Integra Water is a “Tennessee limited liability company seeking permission to own and operate a small wastewater distribution system in Dekalb County, Tennessee for the Casey Cove subdivision.”¹

3. On February 8, 2017, Integra Water filed this *Petition* requesting its initial petition for Certificate of Convenience and Necessity (CCN) and authorization to set rates for the Casey Cove Subdivision.²

4. Integra Water states there is no purchase price for the water system, thus, financing for construction is not required.³ Integra Water proposes a flat rate residential service of \$60.00 per residential equivalent unit (REU) and \$60.00 per REU for nonresidential service.⁴ Finance charges for late payment will be 1.0% per month to the unpaid balance of all bills.⁵ Reconnection charge when cutoff by the utility will be “actual cost.”⁶ New account fees are proposed at \$20.00.⁷

5. Since this is the first request for a CCN, Integra Water will need to demonstrate the requisite managerial, financial and technical capabilities to provide wastewater services at Casey Cove Estates and that a public need exists for such service as required under Tenn. Code Ann. § 65-4-201(a) and TRA Rule 1220-4-13-.04(1)(b).

¹ *Petition*, page 1, paragraph 1. “Integra Water, and its affiliates, service over 30,000 customer accounts across the state of North Carolina and Alabama.” Letter from Michael Myers, Managing Member of Integra Water, to Herbert H. Hilliard, Chairman of TRA (Feb. 7, 2017) (filed with *Petition*).

² *Petition*, page 2, paragraph 6. “The Casey Cove project is in its initial stages and is currently under construction. Phase 1 of Casey Cove is a planned 18 home residential subdivision in Dekalb County, Tennessee with phase 2 & 3 expanding to 31 residential homes.” *Id.*

³ *Id.* at page 2, paragraph 14.

⁴ *Id.* at page 3 and Addendum 1, page 1, number 12-13.

⁵ *Id.* at page 3 and Addendum 1, page 1, number 15.

⁶ *Id.* at Addendum 1, page 1, number 18.

⁷ *Id.* at Addendum 1, page 1, number 19.

6. The interests of consumers, including without limitation the proposed rates and other charges to be paid by the Utility's consumers under the *Petition*, may be affected by determinations and orders made by the Authority in this matter.

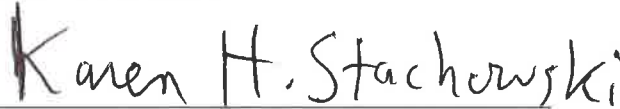
7. Only by participating as a party in this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

WHEREFORE, Petitioner respectfully asks the Authority to grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,



HERBERT H. SLATTERY III (BPR #09077)
Attorney General and Reporter
State of Tennessee



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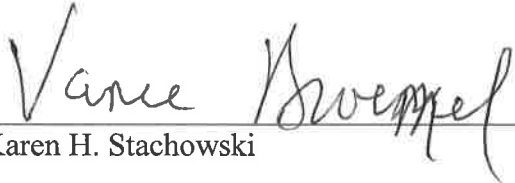
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Hewitt

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 6th day of March 2017.



Karen H. Stachowski