

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE

IN RE: )  
REQUEST OF CHATTANOOGA GAS )  
COMPANY FOR APPROVAL OF ) DOCKET NO. 17-00093  
REQUEST FOR PROPOSAL FOR )  
ASSET MANAGEMENT AND AGENCY )  
AGREEMENT AND GAS PURCHASE )  
AND SALE AGREEMENT )

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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 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 Public Utility Commission (TPUC) to grant the Consumer Advocate's intervention into this proceeding because consumers' interests, rights, duties, or privileges may be determined or affected by the Request for Proposal (RFP) for an Asset Management and Agency Agreement (AMAA) and a Gas Purchase and Sale Agreement (Petition) filed in this Docket by Chattanooga Gas Company (CGC). 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 utility services by initiating and intervening as a party in any matter or proceeding before TPUC in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. § 4-5-101 *et seq.*, and TPUC rules.

2. CGC is a public utility regulated by TPUC and provides natural gas utilities services to approximately 64,000 consumers in the State of Tennessee.

3. On September 5, 2017, CGC filed its Petition seeking TPUC approval.

4. The Petition as filed has been redacted to remove confidential material which can be reviewed only after a party has signed a protective order. It is also anticipated that in order to obtain TPUC approval of the Petition, CGC may file additional confidential information in this Docket.

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

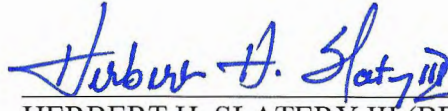
6. Further, to review the transition between the old and new asset management agreements and to ensure that the credits to CGC's customers are properly distributed, the Consumer Advocate must be allowed to participate in this Docket.

7. Therefore, 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.

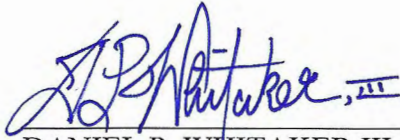
WHEREFORE, the Consumer Advocate respectfully asks the Commission to grant this Petition to Intervene.

*Signature block on next page*

RESPECTFULLY SUBMITTED,



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



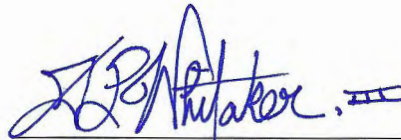
DANIEL P. WHITAKER III (BPR #035410)  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

J.W. Luna, Esq.  
Luna Law Group, PLLC  
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Nashville, TN 37201  
jwluna@LunaLawNashville.com

This the 4<sup>th</sup> day of October, 2017.



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Daniel P. Whitaker III  
Assistant Attorney General