

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)	
)	
PETITION OF THE LAUREL HILLS)	
WATER SYSTEM IN RECEIVERSHIP)	Docket No. 17-00098
FOR PROVISIONAL CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY)	

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 Public Utility Commission (TPUC) to grant the Consumer Advocate's intervention into this Docket because consumers' interests, rights, duties, or privileges may be determined or affected by Receivership Management, Inc.'s (RMI) Petition of Laurel Hills Water System in Receivership for Provisional Certificate of Public Convenience and Necessity (Petition). 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 the TPUC in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. § 4-5-101 *et seq.*, and TPUC rules.
2. RMI is a Tennessee-based corporation appointed by the Cumberland County Chancery Court to serve as the Receiver of the Laurel Hills Water System.
3. On September 12, 2017, RMI filed its Petition seeking a Provisional Certificate of Public Convenience and Necessity (CCN).

4. In its Petition, RMI references the ongoing litigation in Cumberland County Chancery Court, Docket No. 2012-CH-560, related to the purported settlement agreement between the Laurel Hills Condominium POA and TPUC, entered in TPUC Docket No. 12-00077. The Chancery Court of Cumberland County ordered the Consumer Advocate to be allowed to participate in that action.

5. RMI has already received approval to set rates for water services and now seeks a CCN from TPUC to operate the Laurel Hills Water System.

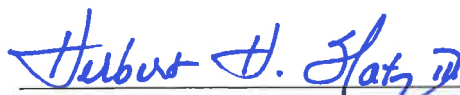
6. The interests of consumers may be affected by the determinations and orders made by the TPUC with respect to (A) the interpretation, application, and implementation of Tenn. Code Ann. § 65-4-201 *et seq.*, and other relevant statutory and regulatory provisions and (B) the review and analysis of information RMI submits in support of its request for a CCN.

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

WHEREFORE, the Consumer Advocate respectfully requests TPUC grant this Petition to Intervene.

Signature block on following page

RESPECTFULLY SUBMITTED,



HERBERT H. SLATTERY III (BPR #09077)
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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 9th day of October, 2017.



Daniel P. Whitaker III
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