



2. Superior Water Service, LLC (Superior) is “an affiliate of King’s Chapel Capacity, LLC (“KCC”). [sic] and was created in order to provide water service to a portion of the King’s Chapel Subdivision in Williamson County.”<sup>1</sup>

3. On October 30, 2017, Superior filed its *Petition* requesting a Certificate of Convenience and Necessity (CCN) along with proposed Tariffs, Rules, Regulations, and a Customer Service Application. While Superior avers in its *Petition* that it is in good standing with the State of Tennessee<sup>2</sup>, this is Superior’s first appearance before TPUC and first request for a CCN.

4. Superior requests that TPUC allow it to adopt the current rates of the Nolensville/College Grove Utility District and to adopt the existing Rules and Regulations of King’s Chapel Capacity.

5. Since this is the first request for a CCN, Superior 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).

6. On November 7, 2017, Counsel for the Nolensville/College Grove Utility District submitted a letter to TPUC detailing that District’s concerns with certain statements Superior made in support of its *Petition*.

7. The interests of consumers, including without limitation the proposed rates and other charges to be paid by Superior’s consumers under the *Petition*, may be affected by determinations and orders made by TPUC in this matter.

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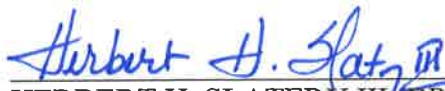
<sup>1</sup> *Petition* at 1.


<sup>2</sup> *Id.*

8. 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 requests TPUC to grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,

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

  
DANIEL P. WHITAKER, III (BPR #035410)  
Assistant Attorney General  
Office of the Tennessee Attorney General  
Public Protection Section  
Consumer Protection and Advocate Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
Phone: (615) 741-1671  
Fax: (615) 532-2910  
Email: Daniel.Whitaker@ag.tn.gov

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:

John Powell  
President, Superior Water Service, LLC  
P.O. Box 40  
Arrington, TN 37014

Henry Walker, Esq.  
Counsel for Nolensville/College Grove Utility District  
Roundabout Plaza  
1600 Division Street, Ste. 700  
Nashville, TN 37203

Benjamin A. Gastel, Esq.  
Michael J. Wall, Esq.  
223 Rosa L Parks Blvd., #200  
Nashville, TN 37203

This the 28<sup>th</sup> day of November, 2017.



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Daniel P. Whitaker, III  
Assistant Attorney General