## BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION NASHVILLE, TENNESSEE

IN RE:	)	
	)	
CHATTANOOGA GAS COMPANY	)	
PETITION FOR APPROVAL OF AN	)	
ADJUSTMENT IN RATES AND	)	Docket No. 18-00017
TARIFF; THE TERMINATION OF	)	
THE AUA MECHANISM AND THE	)	
RELATED TARIFF CHANGES AND	)	
REVENUE DEFICIENCY	)	
RECOVERY; AND AN ANNUAL	)	
RATE REVIEW MECHANISM	)	

## PETITION OF THE CHATTANOOGA REGIONAL MANUFACTURERS ASSOCIATION FOR LEAVE TO INTERVENE

The Chattanooga Regional Manufacturers Association (hereinafter "CRMA), by and through its counsel, pursuant to T.C.A. § 4-5-310(a) respectfully petitions to intervene as a matter of right in this docket. In support of its petition, CMRA states as follows:

- 1. The Chattanooga Regional Manufacturers Association (formerly named the Chattanooga Manufacturers Association) is a one-hundred year old trade association representing over 250 manufacturers and other businesses supporting, servicing and associated with the manufacturing sector, many of whom are customers of Chattanooga Gas Company (the "Company"). CRMA has a legal interest in the outcome of this docket, and desires to intervene in order to fully protect the interests of its members.
- 2. The Authority previously has granted CRMA intervention status in Company cases including, but not limited to, the Company's 2004, 2006, and 2009 rate proceedings.

- 3. In the present docket, the Company seeks approval by the Authority to adjust certain rates and charges, including increases or changes that may adversely affect CRMA ratepayers.
- 4. Granting this Petition will not impair the orderly and prompt conduct of this proceeding.
- 5. Counsel for the Company and counsel for the Consumer Advocate Division of the Office of Attorney General have stated that they do no object to CRMA's request to intervene.
- 6. If this Petition to Intervene is granted, CRMA asks that a complete copy of the Company's Petition and all notices, correspondence and copies of orders and other materials be served upon CRMA's attorney:

Henry Walker, Esq.
Bradley Arant Boult Cummings LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37203
615-252-2363 (Phone)
615-252-6363 (Fax)
hwalker@babc.com

WHEREFORE, the Chattanooga Regional Manufacturers Association respectfully requests that the Commission enter an Order granting this Petition to Intervene.

Respectfully submitted this 8<sup>th</sup> day of March, 2018.

BRADLEY ARANT BOULT CUMMINGS, LLP

By:

Henry M. Walker, Esq.

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## CERTIFICATE OF SERVICE

I hereby certify that I have on this 8<sup>th</sup> day of March, 2018 served the foregoing Petition of the Chattanooga Regional Manufacturers Association for Leave to Intervene either by fax, overnight delivery service or first class mail, postage prepaid, to all parties of record at their addresses shown below:

J.W. Luna, Esq. 333 Union Street, Suite 300 Nashville, Tennessee 37201

Wayne Irvin
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202

Henry M. Walker

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