

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

IN RE:)	
)	
PETITION OF TENNESSEE AMERICAN)	
WATER COMPANY REGARDING)	
CHANGES TO THE QUALIFIED)	
INFRASTRUCTURE INVESTMENT)	
PROGRAM RIDER, THE ECONOMIC)	Docket No. 18-00022
DEVELOPMENT INVESTMENT RIDER,)	
AND THE SAFETY AND)	
ENVIRONMENTAL COMPLIANCE RIDER)	
AND IN SUPPORT OF THE CALCULATION)	
OF THE 2018 CAPITAL RECOVERY)	
RIDERS RECONCILIATION)	

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 or Commission) 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 Tennessee-American Water Company in Support of the Calculation of the 2018 Capital Recovery Riders Reconciliation (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 TPUC in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. § 4-5-101 *et seq.*, and TPUC rules.

2. Tennessee-American Water Company (TAWC) is a public utility regulated by TPUC. It provides water utility services to approximately 75,840 consumers located in Chattanooga, Tennessee, and the surrounding areas.

3. The *Petition* filed by TAWC is a follow-up to a set of tariffs originally approved by TPUC on April 14, 2014, in Docket No. 13-00130. The Consumer Advocate intervened in that Docket and, after extensive negotiation and discovery, entered into a stipulation with TAWC on January 10, 2014, which formed part of the basis of the approval of certain tariffs by the Commission. These tariffs – including the Qualified Infrastructure Improvement Program Rider (QIIP), the Economic Development Investment Rider (EDI), and the Safety and Environmental Compliance Rider (SEC) (collectively, the QIIP, EDI, and SEC are referred to herein as the Capital Riders) – were approved under the “alternative ratemaking” statute, Tenn. Code Ann. § 65-5-103 *et seq.* *Petition* at 3-4.

4. Subsequent to the approval of the Capital Riders in TPUC Docket No. 13-00130, TAWC filed TPUC Docket Nos. 14-00121, 15-00029, 15-00111, 16-00022, 16-00126, 17-00020, and 17-00124, which sought to recover and then to reconcile, respectively, expenses under the Capital Riders. *Petition* at 1. The Commission approved revised tariffs pursuant to those filings. *Id.*

5. Under the tariffs approved in TPUC Docket No. 13-00130, TAWC is required to file with the Commission on or before March 1 of each year a reconciliation for each of the Capital Riders from the previous calendar year, along with the accompanying support, in the manner set forth in those tariffs. *Petition* at 6. TAWC has now submitted its proposed reconciliation for the Capital Riders in this Docket.

6. The interests of consumers may be affected by determinations and orders made by TPUC with respect to (A) the interpretation, application, and implementation of Tenn. Code Ann.

§ 65-5-103(a), Tenn. Code Ann. § 65-5-103(d), and other relevant statutory and regulatory provisions, and (B) the review and analysis of the Company's documentation, financial spreadsheets, and materials.

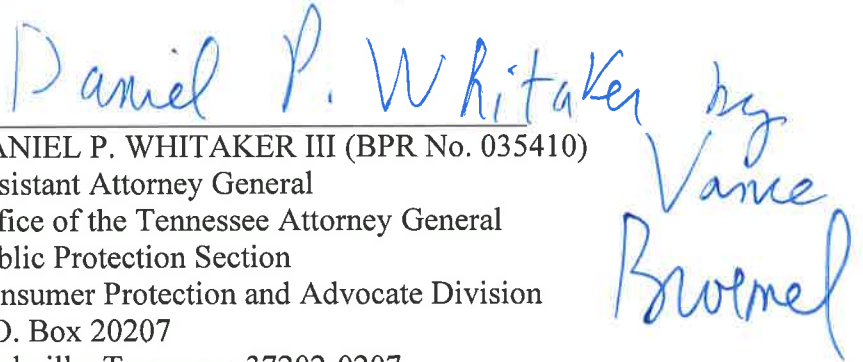
7. Only by participating as a party to this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

Wherefore, the Consumer Advocate requests TPUC grant this *Petition to Intervene*.

RESPECTFULLY SUBMITTED,



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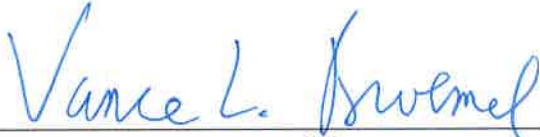
CERTIFICATE OF SERVICE

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 23 day of March, 2018.



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