

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:

PETITION OF 1TENNESSEE)	DOCKET NO. 18-00096
BROADBAND, TV AND TELEPHONE)	
COOPERATIVE, INC. FOR)	
ESTABLISHMENT OF TERRITORIAL)	
BOUNDARIES)	

**PETITION FOR LEAVE TO INTERVENE OF
THE TENNESSEE MUNICIPAL ELECTRIC POWER ASSOCIATION**

The Tennessee Municipal Electric Power Association ("TMEPA"), by and through its undersigned counsel, hereby seeks leave to intervene in the above-captioned proceeding pursuant to Tenn. Code Ann. §§ 4-5-310 and 65-2-107. In support of this petition, TMEPA states as follows:

1. TMEPA is a trade organization whose membership consists primarily of municipal electric systems and other governmental utility systems throughout the State of Tennessee.

2. As explicitly authorized by Parts 4 and 6 of Title 7, Chapter 52 of the Tennessee Code and pertinent provisions of various Private Acts, some TMEPA members have already deployed broadband facilities and are providing broadband voice and Internet access services in various parts of the State.

3. Other TMEPA members may, in the future, provide telecommunications services in various geographic locations as permitted by law.

4. In its Petition, InfoStructure, Inc. d/b/a Click1.net ("Infostructure") claims that it has converted to a non-profit telephone cooperative and requests the Commission to grant it

exclusive territorial boundaries that overlap with the electric service area of Gibson Electric Membership Corporation ("GEMC") and, thus, a portion of the area in which Gibson Connect, LLC ("Gibson Connect") is authorized to provide broadband Internet access and related services.

5. According to the Petition for Leave to Intervene of GEMC and Gibson Connect, Infostructure has taken the position that its purported conversion to a telephone cooperative will prevent GEMC and Gibson Connect from providing broadband services within Infostructure's claimed territorial boundaries.

6. TMEPA strongly disputes Infostructure's claims, including its claim that an entity like Infostructure can convert to a telephone cooperative and claim territorial rights under Tennessee law. Accordingly, the subject of this proceeding may directly affect the operations of Petitioner's members in the State of Tennessee.

7. As a trade association whose members are authorized to provide telecommunications services, TMEPA's legal rights, duties, privileges, immunities or other legal interests or responsibilities may be affected or determined by the outcome of this proceeding, and TMEPA's interest will not be adequately represented unless it is allowed to intervene.

8. Because of its interest in this proceeding, TMEPA respectfully seeks to intervene in this matter.

9. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the requested intervention.

10. Should the requested intervention be granted, all notices, pleadings, orders, documents and the like in this proceeding should be provided to:

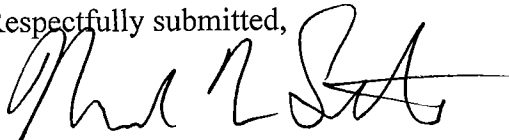
Jeremy L. Elrod
Director of Government Relations
Tennessee Municipal Electric Power Association
212 Overlook Circle, Suite 205
Brentwood, TN 37027
Phone (615) 373-5738
Fax (615) 373-1901
E-mail jelrod@tmepa.org

and

Larry L. Cash (009386)
Mark W. Smith (16908)
Miller & Martin PLLC
1200 Volunteer Building
832 Georgia Avenue
Chattanooga, TN 37402
Phone (423) 756-6600
Fax (423) 785-8480
E-mail larry.cash@millermartin.com
mark.smith@millermartin.com

Based on the foregoing considerations, TMEPA requests that the Commission grant this request for intervention.

Respectfully submitted,



Larry L. Cash (009386)
Mark W. Smith (16908)
Miller & Martin PLLC
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832 Georgia Avenue
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Phone (423) 756-6600
Fax (423) 785-8480
E-mail larry.cash@millermartin.com
mark.smith@millermartin.com

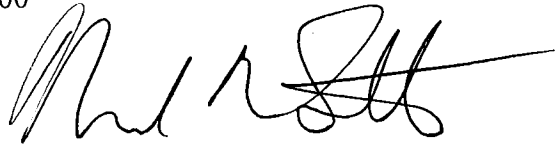
*Attorneys for Tennessee Municipal Electric
Power Association*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy has been forwarded via U.S. Mail to the following on this the 20th day of December, 2018.

Charles B. Welch
Brittany L. Davis
Farris Bobango PLC
414 Union Street, Suite 1105
Nashville, TN 37219

W. Brantley Phillips, Jr.
Russell S. Baldwin
Michael A. Cottone
Bass Berry & Sims PLC
150 Third Avenue South, Suite 2800
Nashville, TN 37201

A handwritten signature in black ink, appearing to read "Michael A. Cottone", is written over a horizontal line.