

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

IN RE:)	
)	
PETITION OF CARTWRIGHT CREEK, LLC)	
TO INCREASE TAP FEES TO ADDRESS)	Docket No. 19-00034
ENVIRONMENTAL ISSUES RAISED BY)	
THE TENNESSEE DEPARTMENT OF)	
ENVIRONMENT AND CONSERVATION)	

PETITION TO INTERVENE

Herbert H. Slatery III, Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate Unit in the Financial 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 Cartwright Creek, LLC to Increase Tap Fees to Address Environmental Issues Raised by the Tennessee Department of Environment and Conservation (Petition)* filed in this Docket. 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. The Company is a Tennessee limited liability company. Its principal office and place of business is at 800 Roosevelt Road, Suite A120, Glen Ellyn, Illinois, 60137-5846. The company currently provides wastewater service through three separate wastewater systems located in the following communities in Williamson County, Tennessee: Arrington Retreat, The Grasslands and The Hideaway.

3. The Company's Petition seeks to increase in the tap fee paid by consumers from \$5,000 to \$10,000.

4. The interests, rights, duties or privileges of consumers may be affected by determinations and orders made by the TPUC in this case.

5. 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,



HERBERT H. SLATTERY III (BPR No. 009077)
Attorney General and Reporter
State of Tennessee



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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 2nd day of April, 2019.

Karen H. Stachowski
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