

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

|   |   |                            |
|---|---|----------------------------|
| <b>IN RE:</b>                           | ) |                            |
|   | ) |                            |
| <b>CHATTANOOGA GAS COMPANY</b>          | ) |                            |
| <b>PETITION TO OPT INTO AN</b>          | ) | <b>DOCKET NO. 19-00047</b> |
| <b>ANNUAL REVIEW OF RATES</b>           | ) |                            |
| <b>MECHANISM PURSUANT TO</b>            | ) |                            |
| <b>TENN. CODE ANN. § 65-5-103(D)(6)</b> | ) |                            |

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

The Chattanooga Regional Manufacturers Association (“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 who are customers of Chattanooga Gas Company (the “Company”). CMRA 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, 2009, and 2018 rate proceedings.

3. In the present docket, the Company seeks approval by the Commission to adopt an annual rate review procedure (“ARM”) that may result in an annual adjustment in certain rates and charges, including increases or changes that may adversely affect CRMA ratepayers.

4. CRMA concurs in the Proposed Procedural Schedule filed on April 24, 2019. Therefore, granting this Petition will not impair the orderly and prompt conduct of this proceeding.

5. Counsel for the Company states that the Company takes no position on this Petition to Intervene. Counsel for the Consumer Advocate Division, and counsel for the TPUC Party Staff have stated that they do not 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:

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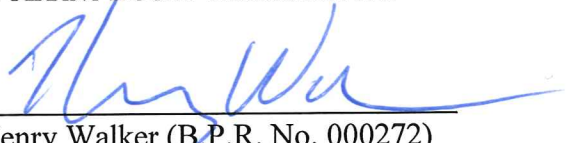
**WHEREFORE**, the Chattanooga Regional Manufacturers Association respectfully requests that the Commission enter an Order granting this Petition to Intervene.

Respectfully submitted this 10<sup>th</sup> day of May, 2019.

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

By: \_\_\_\_\_

  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 10<sup>th</sup> day of May, 2019, a copy of 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:

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HENRY WALKER