IN THE TENNESSEE PUBLIC UTILITY COMMISSION AT NASHVILLE, TENNESSEE

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) Docket No. 21-00086
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PETITION TO INTERVENE

The Consumer Advocate Division of the Office of the Tennessee Attorney General ("Consumer Advocate"), by and through Jonathan Skrmetti, Attorney General and Reporter for the State of Tennessee, pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Public Utility Commission ("TPUC" or the "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 Request to Open a Compliance Audit Review Docket ("Request") filed in this Docket on July 30, 2021. 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 Commission in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. § 4-5-101 et seq., and TPUC rules.
- 2. Superior Wastewater Systems, LLC ("Superior Wastewater" or the "Company") is a public utility regulated by the Commission and provides wastewater service to approximately 342 residential customers in Williamson County, Tennessee. The Company's business address is P.O. Box 40, Arrington Tennessee 37014.

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3. On August 11, 2021, the Commission identified its employees that would participate as parties in this Docket (the "Party Staff").1

4. Party Staff initiated this Docket in order to "review and report on Superior's compliance with Commission Rules 1220-04-13-.07 and .08 regarding financial security and Rule 1220-04-13-.16 regarding affiliate transactions to ensure compliance with the Commission's rules and regulatory requirements. In addition to bonding costs, Party Staff also seeks to review and report on Superior's compliance with reserve/escrow account requirements set forth in Commission Rule 1220-04-13.07(7)."²

5. The interests of consumers served by Superior Wastewater, including but not limited to the funding and the Company's management of the reserve/escrow account, may be affected by determinations and orders made by the Commission with respect to (a) the interpretation, application, and implementation of Commission Rule 1220-04-13-.07(7) and other statutory and regulatory provisions, and (b) the review and analysis of the Company's documentation, financial spreadsheets, and materials.

6. 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 the Commission grant this Petition to Intervene.

Signature on following page

Notice of Designation of Staff Participating as a Party, TPUC Docket No. 21-00086 (Aug. 11, 2021). The Party Staff included are: Ryan McGehee, David Foster, Patsy Fulton, Cole McCormick, Emily Qingshe, and Joe Shirley.

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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, with a curtesy copy provided via electronic mail, upon:

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This the _5th day of October, 2022.

MASON C. RUSH