



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

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)."<sup>2</sup>

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*

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<sup>1</sup> 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.

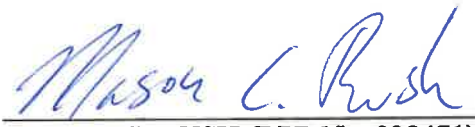
<sup>2</sup> Request, at p. 1.

*In re: Staff Review of Superior Wastewater Systems, LLC*  
Docket No. 21-00086  
Petition to Intervene

RESPECTFULLY SUBMITTED,



JONATHAN SKRMETTI (BPR No. 031551)  
Attorney General and Reporter  
State of Tennessee



MASON C. RUSH (BPR No. 039471)  
Assistant Attorney General  
KAREN H. STACHOWSKI (BPR No. 019607)  
Senior Assistant Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
Phone: (615) 741-2357  
Fax: (615) 741-8151  
Email: [mason.rush@ag.tn.gov](mailto:mason.rush@ag.tn.gov)  
Email: [karen.stachowski@ag.tn.gov](mailto:karen.stachowski@ag.tn.gov)

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CERTIFICATE OF SERVICE

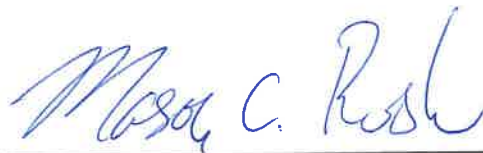
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail,  
with a curtesy copy provided via electronic mail, upon:

Ryan McGehee, Esq.  
Tennessee Public Utility Commission  
Nashville, TN 37243  
(615) 770-1078  
[Ryan.McGehee@tn.gov](mailto:Ryan.McGehee@tn.gov)  
*Attorney for TPUC Staff (As a Party)*

Superior Wastewater Systems, LLC  
John Powell, President  
P.O. Box 40  
Arrington, TN 37014  
[john-powell@comcast.net](mailto:john-powell@comcast.net)

Charles B. Welch, Jr., Esq.  
Tyler A. Cosby, Esq.  
Farris Bobango PLC  
414 Union Street, Suite 1105  
Nashville, TN 37219  
(615) 726-1200  
[cwelch@farris-law.com](mailto:cwelch@farris-law.com)  
[tcosby@farris-law.com](mailto:tcosby@farris-law.com)  
*Attorneys for Superior Wastewater Systems, LLC*

This the 5<sup>th</sup> day of October, 2022.



MASON C. RUSH