BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION NASHVILLE, TENNESSEE

IN RE:)	
CHATTANOOGA GAS COMPANY PETITION FOR APPROVAL OF TARIFF AMENDMENTS <u>ET</u> <u>SEQ</u> .)))	Docket No. 22-00004
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PETITION OF THE CHATTANOOGA REGIONAL MANUFACTURERS ASSOCIATION FOR LEAVE TO INTERVENE

The Chattanooga Regional Manufacturers Association (hereinafter "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 whom are customers of Chattanooga Gas Company (the "Company"). CRMA 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 Authority to amend certain tariffs that may adversely affect CRMA ratepayers.

4. Granting this Petition will not impair the orderly and prompt conduct of this proceeding.

5. Mr. Floyd Self, co-counsel for the Company, has stated that the Company does 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:

Henry Walker, Esq.
Bradley Arant Boult Cummings LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37203
615-252-2363 (Phone)
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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 21st day of January, 2022.

Respectfully Submitted,

By: Henry Walker

Henry Walker (B.P.R. No. 000272)

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 21st day of January, 2022, a copy of the foregoing document was served on the parties of record, via electronic email transmission and regular U.S. Mail, postage prepaid, addressed as follows:

J.W. Luna, Esq. Luna Law Group, PLLC 333 Union Street, Suite 300 Nashville, Tennessee 37201 jwluna@lunalawnashville.com

Henry M. Walker