

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>Petition of Superior Wastewater Systems,</b>	)	
<b>LLC For A Certificate of Convenience and</b>	)	<b>DOCKET NO. 23-00051</b>
<b>Necessity To Amend Its Existing Service</b>	)	
<b>Territory in Williamson County</b>	)	

---

**PETITION OF TENNESSEE WASTEWATER SYSTEMS TO INTERVENE**

---

Tennessee Wastewater Systems, Inc. (“TWSI”) by and through counsel, pursuant to T.C.A. §4-5-310 and §65-2-107 and the Rules and Regulations of the Tennessee Public Utility Commission (the “Commission”) respectfully petitions to intervene in this docket as a matter of right. In support of its petition, TWSI states as follows:

1. TWSI is a provider of wastewater services in Tennessee since being granted its initial certificate from the Commission in 1994.
2. In Commission Docket 97-01393, the Commission granted TWSI a certificate to provide sewer service within a portion of Williamson County, Tennessee called the Milcrofton Utility District Service Territory. TWSI has provided service within this territory since being granted the certificate through onsite and regional wastewater treatment systems.
3. In this present docket, Superior Wastewater Systems, LLC (“Superior”) petitions the Commission to expand its service territory to include several parcels in the Triune area of Williamson County as well as two outlying parcels which fall within TWSI’s certificated Milcrofton Utility District service territory<sup>1</sup>. These parcels are identified as “Parcel # 113 057.06 000 and 113 057.09 000 both with an address of Murfreesboro Rd, College Grove, TN 37046

---

<sup>1</sup> The Triune parcels are not within TWSI’s certificated Milcrofton Service Area.

("Sanford Parcels") in a service request letter from the property owner, Greg Sanford, which is included in Superior's petition.

4. TWSI has not been contacted by the property owner or Superior about its ability to provide service to these parcels.

4. Because the Sanford Parcels are within TWSI's certificated service territory, TWSI's legal rights, duties, privileges, and other legal interests related to the provision of service within its certificated territory will be directly affected by the Commission's determinations in this docket.

5. Accordingly, TWSI requests permission to intervene and participate in this proceeding.

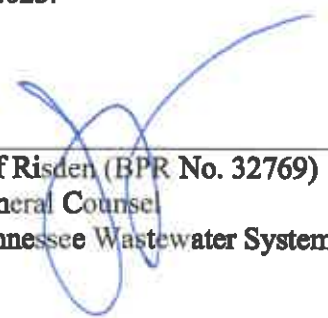
6. Granting TWSI's Petition will not impair the orderly and prompt conduct of this proceeding.

7. If this Petition to Intervene is granted, TWSI requests that all notices, correspondences, pleadings, copies of orders, communications and other materials be served upon TWSI's counsel:


Jeff Riden  
General Counsel  
Tennessee Wastewater Systems, Inc.  
851 Aviation Parkway  
Smyrna, TN 37167  
615-220-7171  
[jeff.riden@adenus.com](mailto:jeff.riden@adenus.com)

WHEREFORE, TWSI respectfully requests that the Commission enter an Order granting this Petition to Intervene.

Respectfully submitted this 23rd day of August 2023.

  
Jeff Riden (BPR No. 32769)  
General Counsel  
Tennessee Wastewater Systems, Inc.

851 Aviation Parkway  
Smyrna, TN 37167  
(615) 220-7171  
[jeff.risden@adenus.com](mailto:jeff.risden@adenus.com)

  
Henry Walker (BPR No. 000272)  
Bradley Arant Boult Cummings, LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
615-252-2363  
[hwalker@bradley.com](mailto:hwalker@bradley.com)

Counsel for Tennessee Wastewater Systems,  
Inc.

### 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:

Tyler A. Cosby  
Charles B. Welch, Jr.  
Farris Bobango, PLC  
414 Union Street, Suite 1105  
Nashville, TN 37218  
[tcosby@farris-law.com](mailto:tcosby@farris-law.com)  
[cwelch@farris-law.com](mailto:cwelch@farris-law.com)

Karen Stachowski  
Mason Rush  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
PO Box 20207  
Nashville, TN 37202  
[karen.stachowski@ag.tn.gov](mailto:karen.stachowski@ag.tn.gov)  
[mason.rush@ag.tn.gov](mailto:mason.rush@ag.tn.gov)

This the 23rd day of June 2023.

Jeff Risden 