

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

IN RE:)	
)	
PETITION OF SUPERIOR)	
WASTEWATER SYSTEMS, LLC TO)	DOCKET NO. 23-00069
ADOPT AN ALTERNATIVE)	
REGULATORY MECHANISM)	
PURSUANT TO TENN. CODE ANN. § 65-5-)	
103(d)(7))	

PETITION TO INTERVENE

The Consumer Advocate Division of the Office of the 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 *Petition of Superior Wastewater Systems, LLC to Adopt an Alternative Regulatory Mechanism Pursuant to Tenn. Code Ann. §65-5-103(d)(7)* filed by Superior Wastewater Systems, LLC (“Superior” or the “Company”). 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 proceedings before the Commission in accordance with the Uniform Administrative Procedures Act and Commission rules.

2. Superior is a public utility organized under the laws of Tennessee, operating in

Tennessee, and providing wastewater utility service to approximately 350 customers in Williamson County, Tennessee.¹

3. Superior's last general rate case, TPUC Docket No. 22-00087, established the Company's current base rates. The Consumer Advocate Division intervened and participated in that docket.

4. In the current Docket, Superior seeks to institute an alternative regulatory mechanism ("ARM"). An ARM is designed to update and refresh the Company's rates each year.

5. The present Docket is the Company's first petition to adopt an ARM. The Company seeks a one-step filing process under Tenn. Code Ann. § 65-5-103(d)(7), where the Company will calculate an increase in rates based on Gross Domestic Product Implicit Price Deflator ("GDP-IPD") and apply this increase to existing base charges.²

6. In the instant matter, the Consumer Advocate seeks to represent the interests of consumers served by the Company. The interests of consumers, including without limitation the proposed increase in rates to be paid by Superior's consumers, may be affected by determinations and orders made by the Commission with respect to: (1) the interpretation, application, and implementation of Tenn. Code Ann. § 65-5-103(d)(7) and other relevant statutory and regulatory provisions; and (2) the review and analysis of the supporting schedules and other documentation, financial spreadsheets, and materials provided by the Company.

7. Only by participating in this proceeding can the Consumer Advocate carry out its statutory duty to represent the interests of consumers.

¹ *Petition of Superior Wastewater Systems, LLC to Adopt an Alternative Regulatory Mechanism Pursuant to Tenn. Code Ann. §65-5-103(d)(7)*, p. 1, ¶¶ 1-2. TPUC Docket No. 23-00069 (Sept. 11, 2023).

² *Id.* at 5:23-27.

WHEREFORE, the Consumer Advocate respectfully requests that the Commission grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,


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



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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 courtesy copy by electronic mail upon:

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This the 29th day of September 2023.



VICTORIA B. GLOVER
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