

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

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| IN RE: |) | |
| |) | |
| TENNESSEE WATER SERVICE, INC. |) | |
| PETITION FOR APPROVAL OF ITS 2025 |) | DOCKET NO. 25-00031 |
| ANNUAL RATE REVIEW FILING |) | |
| PURSUANT TO TENN. CODE ANN. § 65-5- |) | |
| 103(d)(6) |) | |

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 *Tennessee Water Service, Inc. Petition For Approval of its 2025 Annual Rate Review Filing Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)* filed by Tennessee Water Service, Inc. (“TWS” 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. TWS is a public utility organized under the laws of Tennessee, operating in

Tennessee, and engaged in the provision of water utility service to the public for compensation. The Company's business address is #2 N. Wolfscratch Drive, Jasper, GA 30143.¹

3. TWS's last general rate case, TPUC Docket No. 19-00028, established the Company's current base rates.² The Consumer Advocate Division intervened and participated in that matter.

4. TWS petitioned³ the Commission in TPUC Docket No. 23-00046 for an Annual Review of Rates Mechanism ("ARM") and TPUC approved⁴ the proposed Stipulation and Settlement Agreement in that docket.

5. Although the Settlement Agreement in TPUC Docket No. 23-00046 does not allow for the Company to raise tariff rates⁵ in its first two ARM filings, the Consumer Advocate seeks to ensure that the Company is properly utilizing the approved ARM Methodologies and seeks to review the Company's new Cost Allocation Manual ("CAM") for its possible impact on customers.⁶

6. In the instant matter, the Consumer Advocate seeks to represent the interests of consumers served by TWS. The interests of consumers, including without limitation the analysis and confirmation that the approved ARM methodologies are being utilized appropriately, which may be affected by determinations and orders made by the Commission with respect to:

¹ *Tennessee Water Service, Inc. Petition for Approval of its 2025 Annual Rate Review Filing Pursuant to Tenn. Code Ann. §65-5-103(d)(6)*, at 1, TPUC Docket No. 25-00031 (May 30, 2025).

² *Petition of Tennessee Water Service, Inc. for Adjustment of Rates and Charges, Approval of a Qualified Infrastructure Investment Program, and Modification to Certain Terms and Conditions for the Provision of Water Service*, TPUC Docket No. 19-00028 (Feb. 28, 2019).

³ *Petition of Tennessee Water Service, Inc. to Adopt an Annual Review of Rates Mechanism Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)*, TPUC Docket No. 23-00046 (June 20, 2023).

⁴ *Order Approving Stipulation and Settlement Agreement on Annual Rate Review Mechanism and Tariff*, TPUC Docket No. 23-00046 (November 16, 2023).

⁵ *Direct Testimony of Andrew Dickson* at 7:4-9 (May 30, 2025).

⁶ *Id.* at 7:4-9.

(1) the interpretation, application, and implementation of Tenn. Code Ann. § 65-5-103(d)(6) 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 TWS.


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

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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Consumer Advocate's Petition to Intervene

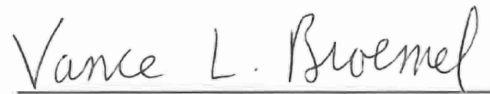
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail upon:

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This the 3rd day of July 2025.


VANCE L. BROEMEL
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