

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

Electronically Filed in TPUC Docket Room
on September 24, 2025 at 10:01 a.m.

IN RE:)
)
PETITION OF INTEGRATED RESOURCE)
MANAGEMENT, INC. TO ADOPT AN)
ALTERNATIVE REGULATORY)
MECHANISM PURSUANT TO TENN.)
CODE ANN. § 65-5-103(d)(7))
)

DOCKET NO. 25-00072

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 Integrated Resource Management, Inc. to Adopt an Alternative Regulatory Mechanism Pursuant to Tenn. Code Ann. §65-5-103(d)(7)* filed by Integrated Resource Management, Inc. (“IRM” 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. IRM is a public utility organized under the laws of Tennessee, operating in

Tennessee, and providing wastewater utility service to approximately 273 customers in East Tennessee.¹

3. IRM's last general rate case, TPUC Docket No. 24-00073, established the Company's current base rates. The Consumer Advocate Division did not intervene in that docket.

4. In the current Docket, IRM 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 IRM'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 Integrated Resource Management, Inc. to Adopt an Alternative Regulatory Mechanism Pursuant to Tenn. Code Ann. §65-5-103(d)(7)*, p. 1, ¶ 1-2. TPUC Docket No. 25-00072 (Sept. 3, 2025).

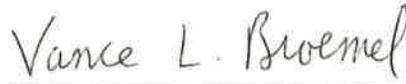
² *Id.* at 6. ¶ 6.

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
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CA 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 24 day of September 2025.



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