

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

**IN RE:**

**APPLICATION OF TWO RIVERS, LLC FOR  
A CERTIFICATE OF CONVENIENCE AND  
NECESSITY**

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**DOCKET NO. 25-00073**

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**PETITION TO INTERVENE**

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The Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), by and through counsel, 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 *Application of Two Rivers, LLC for a Certificate of Convenience and Necessity* (“*Petition*”) filed in TPUC Docket No. 25-00073.

The Consumer Advocate is intervening in this proceeding to review the complete filing by Two Rivers, LLC (“Two Rivers” or the “Company”) and determine if the *Petition* is in the best interest of consumers.

For cause, 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 any matter or proceeding before the Commission in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. §§ 4-5-101, *et seq.*, and TPUC rules.

2. Two Rivers is a Tennessee limited liability company operating in Tennessee.<sup>1</sup> The Company’s principal place of business is at 673 West Main Street, Adamsville, Tennessee 38310.<sup>2</sup> Two Rivers is owned and operated by Craig Chrestman and Joey Wimberley. Both owners have extensive experience in operating, installing, and maintaining onsite wastewater systems in Tennessee.<sup>3</sup>

3. Two Rivers is requesting a Certificate of Convenience and Necessity (“CCN”) to serve an area in Tennessee.<sup>4</sup> Two Rivers is seeking to serve the Canterbury Manor Subdivision which is an unincorporated area of Fayette County.<sup>5</sup> Renaissance Development S-Corp, Inc. is the developer that has requested Two Rivers to serve the area.<sup>6</sup>

4. The Company’s Articles of Incorporation were filed with the Tennessee Secretary of State’s Office and became effective on November 25, 2024.<sup>7</sup> This is the Company’s first petition with the Commission, and as such, the Commission has no prior review of the Company’s technical, financial, and managerial capabilities to provide wastewater services.

5. The interests of consumers in this CCN *Petition* may be affected by determinations and orders made by the Commission with respect to its interpretation, application, and implementation of Tenn. Code Ann. § 65-4-113 and other relevant statutory and regulatory provisions. Such interests include, but are not limited to, the technical, financial, and managerial capabilities of the Company to provide wastewater services and that a public need exists for such services under Tenn. Code Ann. § 65-4-201(a), TPUC Rule 1220-4-13-.04(1)(b), and TPUC Rule 1220-4-13-.17.

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<sup>1</sup> *Petition* at 3.  
<sup>2</sup> *Id.*  
<sup>3</sup> *Id.*  
<sup>4</sup> *Id.* at 1.  
<sup>5</sup> *Id.* at 3.  
<sup>6</sup> *Petition* at 3.  
<sup>7</sup> *Id.* at Exhibit 3.

6. Only by participating as a party to this proceeding can the Consumer Advocate Adequately carry out its statutory duty to represent the interests of Tennessee consumers.

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

RESPECTFULLY SUBMITTED,

 *Jonathan Skrmetti*

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

 *Karen H. Stachowski*

**KAREN H. STACHOWKIS** (BPR No. 019607)  
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**TPUC Docket No. 25-00073**  
*CA's Petition to Intervene*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via electronic mail,  
with a courtesy copy by U.S. Mail, by request, provided upon:

Melvin J. Malone  
The Pinnacle at Symphony Place  
150 3rd Avenue South, Suite 1600  
Nashville, TN 37201  
[melvin.malone@butlersnow.com](mailto:melvin.malone@butlersnow.com)

This the 6 day of October, 2025



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**KAREN H. STACHOWSKI**  
Deputy Attorney General