

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

IN RE:)
)
PETITION OF TENNESSEE-AMERICAN)
WATER COMPANY TO ADOPT)
ANNUAL REVIEW MECHANISM) **DOCKET NO. 25-00089**
AND ARM TARIFF PURSUANT TO)
TENN. CODE ANN. § 65-5-103(D)(6))

PETITION TO INTERVENE

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 *Petition to Adopt Annual Review Mechanism and ARM Tariff Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)* (“*Petition*”) filed by Tennessee-American Water Company (“TAWC” or the “Company”) in this Docket. 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 TPUC in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. §§ 4-5-101, *et seq.*, and TPUC rules.
2. TAWC is an investor-owned public utility regulated by TPUC pursuant to Tenn. Code Ann. § 65-4-101.

3. TAWC is engaged in the business of providing water and water services to residential, commercial, and industrial customers in Tennessee. TAWC's principal office in Tennessee is located at 109 Wiehl Street, Chattanooga, Tennessee 37403.

4. TAWC's current base rates were established by this Commission in January 2025 in TPUC Docket No. 24-00032. The Consumer Advocate intervened and participated in that matter.

5. The present Docket is the Company's first request to opt in an annual review of its rates pursuant to Tenn. Code Ann. § 65-5-103(6)(a). TAWC seeks to utilize the ratemaking methodologies based on those approved in its most recent general rate case (TPUC Docket No. 24-00032).

6. The ARM will be a one-step, or single-filing, annual process. The Company proposes to file each annual ARM petition by March 31st of each year with adjusted rates going into effect on August 1st of the same year.¹

7. The Company also proposes to use a historical base year review ending December 31st of the prior year of its revenues, expenses, investments, and rate of return on equity adopted in its last rate case.

8. In this matter, the Consumer Advocate seeks to represent the interests of consumers served by TAWC. The interests of customers under the annual rate review, 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)(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 TAWC.

¹ *Petition at 4, ¶11.*

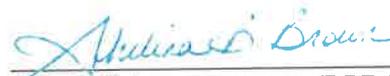
9. Only by participating as a party to this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

Wherefore, the Consumer Advocate requests TPUC grant this *Petition to Intervene*.

RESPECTFULLY SUBMITTED,



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



SHILINA B. BROWN (BPR No. 020689)
Senior Assistant Attorney General
VICTORIA B. GLOVER (BPR No. 037954)
Assistant Attorney General
Office of the Tennessee Attorney General
Financial Division, Consumer Advocate Unit
P.O. Box 20207
Nashville, Tennessee 37202
Phone: (615) 741-2357
Fax: (615) 741-1026
Email: Shilina.Brown@ag.tn.gov
Email: Victoria.Glover@ag.tn.gov

CERTIFICATE OF SERVICE

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

Robert (Bob) Lane
Sr. Manager, Rates & Regulatory
Tennessee-American Water
109 Wiehl St
Chattanooga, TN 37403
Phone: 423-315-2748
Email: bob.lane@amwater.com

Ryan A. Freeman
Corporate Counsel
Tennessee-American Water
109 Wiehl St
Chattanooga, TN 37403
Phone: 423-660-4399
Email: ryan.freeman@amwater.com

Melvin J. Malone
Butler Snow LLP
1320 Adams St
Suite 1400
Nashville, TN 37208
Phone: 615-651-6700
Email: melvin.malone@butlersnow.com

This the 11th day of December, 2025.



SHILINA B. BROWN
Senior Assistant Attorney General