

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:)
)
PETITION OF SPIRE TENNESSEE INC.)
FOR APPROVAL OF ITS 2026 ANNUAL) DOCKET NO. 26-00042
REVIEW OF RATES MECHANISM)
("ARM") 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 Spire Tennessee Inc for Approval of Its 2026 Annual Review of Rates Mechanism ("ARM") Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)* ("Petition") filed by Spire Tennessee Inc. ("Spire" 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. Spire Tennessee Inc. is a wholly owned subsidiary of Spire, one of the largest publicly traded gas distribution utilities in the country.
3. In TPUC Docket 25-00074, the joint application of Piedmont Natural Gas, Inc. and Spire Tennessee Inc for the transfer of authority from Piedmont to Spire Tennessee was approved March 16, 2026, and became effective April 1, 2026.

4. A part of the approval of transfer from the Commission was the transfer of a limited version of Piedmont’s existing ARM, which was the third ARM approved by the Commission on November 25, 2025.¹

5. Spire seeks in this Docket approval of its Interim ARM which will be in place from 2026 to 2028.

6. Spire also seeks the implementation of new Base Margin Rates of 4% while there is some ambiguity of the application of that rate. The Company is also seeking to update Weather Normalization Adjustment factors and recovery of environmental expenses related to the remediation of the former Nashville Gas Company manufactured gas plant (“MGP”) located at 800 2nd Ave North in Nashville (“former Nashville MGP Site” or “Site”) through updated Base Margin Rates.^{2,3}

7. The interests of consumers may be affected by determinations and orders made by TPUC with respect to: (a) the interpretation, application, and implementation of Tenn. Code Ann. § 65-5-103(a), (d), and other relevant statutory and regulatory provisions; and (b) the review and analysis of the Petitioners’ documentation, financial spreadsheets, and other materials.

8. 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.

1 *Order Approving Settlement Agreement and Setting ARRM Rates*, TPUC Docket No. 25-00036 (November 25, 2025).

2 *Direct Testimony of Jay Neal*, at 19, TPUC Docket No. 26-00042 (May 20, 2026).

3 *Direct Testimony of David Yonce*, at 4 to 6, TPUC Docket No. 26-00042 (May 20, 2026).

RESPECTFULLY SUBMITTED,


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CERTIFICATE OF SERVICE

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

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This the 8 day of June, 2026.



SHILINA BROWN
Senior Assistant Attorney General