

STATE OF TENNESSEE

Office of the Attorney General



2003 AUG 29 PM 1:49

T.R.A. DOCKET ROOM

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August 29, 2003

Honorable Deborah Taylor Tate
Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

**RE: PETITION OF CHATTANOOGA GAS COMPANY, NASHVILLE GAS COMPANY, A
DIVISION OF PIEDMONT NATURAL GAS COMPANY, INC., AND UNITED CITIES
GAS COMPANY, A DIVISION OF ATMOS ENERGY CORPORATION FOR A
DECLARATORY RULING REGARDING THE COLLECTIBILITY OF THE GAS COST
PORTION OF UNCOLLECTIBLE ACCOUNTS UNDER THE PURCHASED GAS
ADJUSTMENT ("PGA") RULES
Docket No. 03-00209**

Dear Chairman Tate:

Enclosed is an original and thirteen copies of a Motion for Protective Order of the Consumer Advocate and Protection Division of the Office of the Attorney General in the above-referenced matter. Kindly file the attached in this docket. By copy of this letter, we are serving all parties of record. If you have any questions, please feel free to contact me at (615) 532-3382. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Shilina B. Chatterjee".

Shilina B. Chatterjee
Assistant Attorney General
(615) 532-3382

Enclosures

cc: Lynn Questell, Esq.
Hearing Officer
All Parties of Record

68301

IN RE:

DOCKET NO. 03-00209

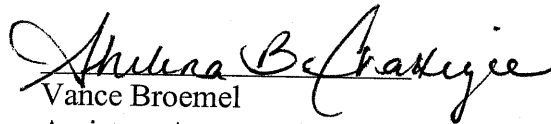
As grounds in support of its motion, made pursuant to Rule 26.03 of the Tennessee Rules of Civil Procedure, the Consumer Advocate would show: 1) the discovery requests were untimely filed at 4:30 PM on July 28, 2003, in contravention of the scheduling orders of the Hearing Officer in this docket and TRA Rule 1220-1-1-.11(1); 2) the requests clearly seek the legal work product of the Consumer Advocate; 3) the request is overly broad and burdensome; 4) the requests seek information that is confidential and privileged under the attorney-client

privilege and the governmental deliberative process privilege; 5) the requests seek information from experts who may not testify at the hearing of this matter; and 6) the requests are not reasonably calculated to lead to discovery of admissible evidence in this matter.

For the foregoing reasons, the Consumer Advocate requests that the discovery of Atmos be limited to the information voluntarily provided by the Consumer Advocate in response to the July 28, 2003 discovery requests.

Respectfully submitted,

PAUL G. SUMMERS

A handwritten signature in cursive script, appearing to read "Vance Broemel".

Vance Broemel

Assistant Attorney General

B.P.R. # 11421

Shilina B. Chatterjee

Assistant Attorney General

B.P.R. #20689

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via hand delivery or facsimile or U.S. Mail on August 29, 2003.

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Shilina B. Chatterjee
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