

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re: Petition to Open an Investigation to Determine)
Whether Atmos Energy Corp. Should be Required by)
the TRA to Appear and Show Cause That Atmos)
Energy Corp. Is Not Overearning in Violation of)
Tennessee Law and That it Is Charging Rates That Are)
Just and Reasonable)

Docket No. 05-00258

**CHATTANOOGA GAS COMPANY'S RESPONSE TO DISCOVERY REQUEST OF
THE CONSUMER ADVOCATE AND PROTECTION DIVISION TO CHATTANOOGA
GAS COMPANY ISSUED JULY 21, 2006**

DISCOVERY REQUESTS

1. Please identify each person whom you expect to call as an expert witness at the Phase One hearing in this docket, and for each such expert witness:

- (a) Identify the field in which the witness is to be offered as an expert;
- (b) Provide complete background information, including the witness's current employer, as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify;
- (c) Identify all publications written or presentations presented in whole or in part by the witness, including either a copy of all such publications and presentations or a reference to where such publications and presentations may be publicly obtained;
- (d) Provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
- (e) Identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;

- (f) Identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;
- (g) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert; and
- (h) Please produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, file notes, charts, notes, tests, test results, interview notes, and consultations notes provided to, reviewed by, utilized by, relied upon, created by, or produced by any proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter.

RESPONSE:

Based on the pre-filed direct testimony in this matter, Chattanooga Gas Company, Inc. ("CGC" or "Company"), at this time, does not intend to present direct testimony in the Phase One hearing in this docket and thus has not identified any witnesses. Chattanooga Gas Company, however, reserves the right to present rebuttal witnesses if new issues impacting the Company's rights, responsibilities, and privileges are raised in pre-filed rebuttal or during cross examination.

2. Please identify the name and location of all persons having knowledge of discoverable matters in this case.

RESPONSE: See the response #1.

3. Please produce copies of all documents referred to or relied upon in responding to these discovery requests.

RESPONSE: See the response #1.

4. Please produce copies of all hearing exhibits that you will introduce, use, or reference during the Phase One hearing.

RESPONSE: At this time CGC has not prepared any exhibits that it intends to introduce, use, or reference during the Phase One hearing. However, depending on pre-filed rebuttal and/or responses provided during cross examination, CGC reserves its right to introduce, use, or refer to exhibits at the hearing.

5. Please produce copies of all documents -- including, without limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial

information -- that Chattanooga contends support the factual assertions, conclusions, or opinions of any Chattanooga witness in this matter.

RESPONSE: See the response #1.

6. Please produce copies of all documents -- including, without limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information -- relied upon by any Chattanooga witness in evaluating, reaching conclusions, or formulating an opinion in this matter.

RESPONSE: See the response #1.

7. Please produce copies of all documents -- including, without limitation, workpapers, spreadsheets, summaries, charts, notes, and exhibits -- created by or for or prepared by or for any Chattanooga witness in evaluating, reaching conclusions, or formulating an opinion in this matter.

RESPONSE: See the response #1.

8. Please state whether Chattanooga will take a position in Phase One of this docket regarding the justness and reasonableness of rates charged by Atmos Energy Corporation to Tennessee ratepayers.

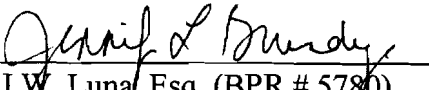
RESPONSE: At this time, CGC has not determined if it will take a position in Phase One of this docket regarding the justness and reasonableness of rates charged by Atmos Energy Corporation to Tennessee ratepayers.

9. Please state in detail and provide all supporting grounds for any position taken by Chattanooga regarding the justness and reasonableness of rates -- including, but not limited to, revenues, expenses, taxes, net operating income, rate base, and cost of capital -- proposed during Phase One of this docket by the Consumer Advocate, TRA Staff, and Atmos Energy Corporation.

RESPONSE: See the response #8.

Respectfully submitted,

FARMER & LUNA, PLLC

By: 
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020673)
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Attorneys for Chattanooga Gas Company

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been forwarded via email or U.S. Mail, postage pre-paid, to the following parties of interest on this the 4th day of August, 2006.

Vance L. Broemel
Joe Shirley
Cynthia Kinser
Office of Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
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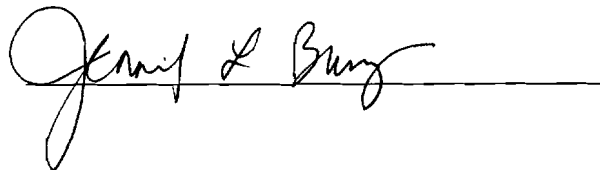
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A handwritten signature in black ink, appearing to read "Jennifer L. Bury", is written over a horizontal line.