

**IN 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) Docket No. 05-00258
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)

**ATMOS ENERGY CORPORATION'S SUPPLEMENTAL AND AMENDED
RESPONSES TO THE FIRST DISCOVERY REQUESTS FROM THE CONSUMER
ADVOCATE AND PROTECTION DIVISION**

INTRODUCTION

In accordance with *Tennessee Rule of Civil Procedure 26.05(2)*, Atmos Energy Corporation ("Atmos") submits this Supplemental and Amended Response to the First Discovery Request from the Consumer Advocate and Protection Division ("CAPD" and "CAPD First Discovery Request(s)"). Specifically, Atmos is revising and supplementing its prior response to CAPD First Discovery Request Part II, No. 6(c)(3).

SUPPLEMENTAL AND AMENDED RESPONSE

*(For convenience and context, Atmos has reset forth the entirety of the discovery request in this Supplemental Response; however, the applicable portion of the request is **bolded and underlined.**)*

6. Please provide the data for the following categories of customer service:
- (A) Customer Service (Call Center) since ATMOS purchased United Cities by year through 2005
1. Number of Calls received and percent answered;
 2. Average Answer Time (in seconds);

3. Length of Call (in minutes);
 4. After Call Processing time (in minutes or percent);
 5. Number of Customer Service Walk-Ins;
 6. Customer Call Backs;
 7. Supervisor Referrals; and
 8. Cash Transactions Processed by affiliated agencies.
 9. Provide the total number of Call Center employees (by month/by title).
 10. Provide the allocated employees by title/by month to Tennessee.
- (B) Meter Services (Tennessee) by year (since ATMOS purchased United Cities through 2005):
1. Number of Meters Read;
 2. Risers Inspected;
 3. Estimated Readings;
 4. Percent Estimated;
 5. Meters Skipped;
 6. Re-reads;
 7. Door Tags or other "customer provided readings."
- (C) **Service Department (Tennessee by month since ATMOS purchased United Cities Through 2005):**
1. Orders Worked;
 2. Appointment Orders;
 - 3. Appointments Missed;**
 4. Emergency Orders;
 5. Emergency Response Time (in minutes);
 6. Meters Set.
- (D) Construction Department (Tennessee by month since ATMOS purchased United Cities through 2005):
1. Service Orders Received;
 2. Service Orders Installed;
 3. Backlog (Weeks);
 4. Damages;
 5. Service Renewal/Relocate;
 6. Services Retired; and
 7. Survey Leaks.

SUPPLEMENTAL AND AMENDED RESPONSE TO PART II, NO. 6(C)(3)

Atmos' computer system does not track, as a matter of ordinary course in its business, the information in the format in which the CAPD requested it. As such, in accordance with its discovery obligations, Atmos initially compiled the information responsive to this request as quickly as possible. To do so, Atmos constructed a query of its system and set the parameters as *any order* in the system that was not completed on or before the next day. Upon compilation, that information was produced (the "Initial Production").

After reviewing the Initial Production and the original "Missed Call" information, Atmos discovered that the Initial Production reflected all types of orders, both *internal* (company generated) and *external* (customer request), that were not completed on or before the next day. The internal (company generated) orders are not responsive to a particular customer's request and relate to routine tasks such as painting a meter, collection, disconnecting for non-payment, checking meters, etc.

As the CAPD's request was directed toward finding external (customer request) appointments "missed", Atmos has re-queried its system using more precise search parameters; the attached listing are those orders received from customers with an assumption of next day service. In other words, Atmos' new search parameters were set to any customer generated order that was not completed on or before the next business day. This search results in a response time that is more indicative of Atmos' true response time to customer requests and should supplant the earlier information produced.

Because Atmos constructed parameters with the express purpose of responding to discovery (rather than a data point that is maintained in the ordinary course of business), the results include some margin of calls that are not "missed," as that term has been defined for

purposes of this discovery response. Examples include: the customer asked that the service call be made later than the next day; the customer was not available the next day for Atmos to complete the service call; the task was too large to be completed in one day; etc.

An electronic working copy of the spreadsheet is being provided to all parties.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been hand-delivered, e-mailed or faxed and mailed to the following parties of interest this 7th day of August, 2006.

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Year/Mo	S/O	# Appoints	# Missed
2005/12	TOSI	1,842	26
2005/12	SEAS	5	0
2005/12	RRUN	2,180	89
2005/12	RETO	38	0
2005/12	RDEL	587	5
2005/12	MSET	373	17
2005/12	FINL	1,381	84
2005/12	CUST	22	2
2005/11	TOSI	2,826	63
2005/11	SEAS	5	0
2005/11	RRUN	2,290	160
2005/11	RETO	53	3
2005/11	RDEL	1,249	11
2005/11	MSET	533	21
2005/11	FINL	1,883	213
2005/11	CUST	36	1
2005/10	TOSI	2,976	85
2005/10	SEAS	4	0
2005/10	RRUN	2,237	107
2005/10	RETO	82	5
2005/10	RDEL	1,502	23
2005/10	MSET	433	25
2005/10	FINL	1,950	103
2005/10	CUST	28	2
2005/09	TOSI	1,441	54
2005/09	SEAS	8	0
2005/09	RRUN	2,096	93
2005/09	RETO	37	2
2005/09	RDEL	745	8
2005/09	MSET	242	21
2005/09	FINL	2,154	102
2005/09	CUST	24	1
2005/08	TOSI	1,495	46
2005/08	SEAS	7	0
2005/08	RRUN	2,717	100
2005/08	RETO	29	0
2005/08	RDEL	804	6
2005/08	MSET	184	8
2005/08	FINL	2,605	107
2005/08	CUST	20	0
2005/07	TOSI	1,080	40
2005/07	SEAS	22	1
2005/07	RRUN	2,270	92
2005/07	RETO	23	0
2005/07	RDEL	767	10
2005/07	MSET	146	8
2005/07	FINL	2,721	116
2005/07	CUST	15	0
2005/06	TOSI	1,106	26
2005/06	SEAS	106	4
2005/06	RRUN	2,285	171

2005/06	RETO	21	0
2005/06	RDEL	1,147	13
2005/06	MSET	181	9
2005/06	FINL	2,815	265
2005/06	CUST	20	0
2005/05	TOSI	1,170	29
2005/05	SEAS	198	5
2005/05	RRUN	2,202	113
2005/05	RETO	25	0
2005/05	RDEL	1,124	8
2005/05	MSET	168	5
2005/05	FINL	2,979	169
2005/05	CUST	17	1
2005/04	TOSI	1,050	29
2005/04	SEAS	210	12
2005/04	RRUN	1,873	67
2005/04	RETO	11	0
2005/04	RDEL	1,338	8
2005/04	MSET	155	4
2005/04	FINL	2,585	104
2005/04	CUST	10	1
2005/03	TOSI	1,324	20
2005/03	SEAS	64	2
2005/03	RRUN	2,264	97
2005/03	RETO	17	1
2005/03	RDEL	976	5
2005/03	MSET	222	13
2005/03	FINL	2,218	126
2005/03	CUST	20	1
2005/02	TOSI	1,399	23
2005/02	SEAS	7	1
2005/02	RRUN	2,193	100
2005/02	RETO	15	0
2005/02	RDEL	826	3
2005/02	MSET	249	8
2005/02	FINL	1,810	119
2005/02	CUST	15	3
2005/01	TOSI	1,750	33
2005/01	SEAS	1	0
2005/01	RRUN	2,188	103
2005/01	RETO	14	0
2005/01	RDEL	826	1
2005/01	MSET	329	14
2005/01	FINL	1,780	77
2005/01	CUST	12	0
2004/12	TOSI	2,664	43
2004/12	SEAS	10	0
2004/12	RRUN	2,044	142
2004/12	RETO	32	2
2004/12	RDEL	780	7
2004/12	MSET	538	22
2004/12	FINL	1,588	153

2004/12	CUST	18	0
2004/11	TOSI	3,145	61
2004/11	SEAS	7	1
2004/11	RRUN	1,956	80
2004/11	RETO	42	1
2004/11	RDEL	1,555	16
2004/11	MSET	641	27
2004/11	FINL	1,783	117
2004/11	CUST	27	1
2004/10	TOSI	2,557	58
2004/10	SEAS	10	1
2004/10	RRUN	1,968	63
2004/10	RETO	60	5
2004/10	RDEL	1,732	24
2004/10	MSET	572	27
2004/10	FINL	1,850	107
2004/10	CUST	27	2
2004/09	TOSI	1,517	43
2004/09	SEAS	10	0
2004/09	RRUN	1,867	46
2004/09	RETO	38	1
2004/09	RDEL	677	10
2004/09	MSET	296	21
2004/09	FINL	2,047	67
2004/09	CUST	21	2
2004/08	TOSI	1,754	62
2004/08	SEAS	4	1
2004/08	RRUN	2,233	55
2004/08	RETO	24	1
2004/08	RDEL	514	8
2004/08	MSET	243	10
2004/08	FINL	2,594	57
2004/08	CUST	8	0
2004/07	TOSI	1,362	37
2004/07	SEAS	22	2
2004/07	RRUN	2,051	52
2004/07	RETO	20	1
2004/07	RDEL	764	8
2004/07	MSET	183	15
2004/07	FINL	2,761	73
2004/07	CUST	12	0
2004/06	TOSI	1,403	39
2004/06	SEAS	85	3
2004/06	RRUN	2,064	37
2004/06	RETO	16	0
2004/06	RDEL	1,586	9
2004/06	MSET	192	9
2004/06	FINL	2,739	66
2004/06	CUST	23	1
2004/05	TOSI	1,174	40
2004/05	SEAS	271	9
2004/05	RRUN	2,072	53

2004/05	RETO	15	1
2004/05	RDEL	1,471	19
2004/05	MSET	153	9
2004/05	FINL	2,868	71
2004/05	CUST	14	1
2004/04	TOSI	1,034	18
2004/04	SEAS	176	14
2004/04	RRUN	2,073	47
2004/04	RETO	17	0
2004/04	RDEL	1,551	19
2004/04	MSET	189	10
2004/04	FINL	2,725	71
2004/04	CUST	11	1
2004/03	TOSI	1,209	25
2004/03	SEAS	96	3
2004/03	RRUN	2,298	55
2004/03	RETO	21	0
2004/03	RDEL	1,748	10
2004/03	MSET	222	4
2004/03	FINL	2,608	108
2004/03	CUST	16	2
2004/02	TOSI	1,312	25
2004/02	SEAS	4	1
2004/02	RRUN	2,241	100
2004/02	RETO	18	0
2004/02	RDEL	1,092	7
2004/02	MSET	268	10
2004/02	FINL	1,777	98
2004/02	CUST	14	0
2004/01	TOSI	1,571	20
2004/01	SEAS	3	0
2004/01	RRUN	2,239	67
2004/01	RETO	18	1
2004/01	RDEL	682	5
2004/01	MSET	285	7
2004/01	FINL	1,709	81
2004/01	CUST	21	0
2003/12	TOSI	2,049	49
2003/12	SEAS	8	0
2003/12	RRUN	2,198	66
2003/12	RETO	21	0
2003/12	RDEL	983	11
2003/12	MSET	392	12
2003/12	FINL	1,740	81
2003/12	CUST	13	0
2003/11	TOSI	2,582	61
2003/11	SEAS	6	0
2003/11	RRUN	2,056	109
2003/11	RETO	50	0
2003/11	RDEL	1,433	11
2003/11	MSET	585	26
2003/11	FINL	1,489	102

2003/11	CUST	17	1
2003/10	TOSI	3,191	116
2003/10	SEAS	5	0
2003/10	RRUN	2,475	93
2003/10	RETO	117	5
2003/10	RDEL	2,076	28
2003/10	MSET	649	33
2003/10	FINL	2,039	98
2003/10	CUST	34	3
2003/09	TOSI	2,311	76
2003/09	RRUN	2,414	67
2003/09	RETO	97	2
2003/09	RDEL	1,445	20
2003/09	MSET	337	23
2003/09	FINL	2,149	56
2003/09	CUST	12	0
2003/08	TOSI	1,684	64
2003/08	SEAS	5	0
2003/08	RRUN	2,715	66
2003/08	RETO	24	0
2003/08	RDEL	1,058	14
2003/08	MSET	200	9
2003/08	FINL	2,314	58
2003/08	CUST	16	0
2003/07	TOSI	1,513	45
2003/07	SEAS	31	0
2003/07	RRUN	2,818	59
2003/07	RETO	21	1
2003/07	RDEL	1,412	8
2003/07	MSET	177	8
2003/07	FINL	2,731	55
2003/07	CUST	22	0
2003/06	TOSI	1,408	42
2003/06	SEAS	112	6
2003/06	RRUN	2,380	65
2003/06	RETO	34	0
2003/06	RDEL	1,431	15
2003/06	MSET	158	9
2003/06	FINL	2,654	67
2003/06	CUST	9	0
2003/05	TOSI	1,305	34
2003/05	SEAS	226	12
2003/05	RRUN	2,340	62
2003/05	RETO	16	0
2003/05	RDEL	1,997	7
2003/05	MSET	155	14
2003/05	FINL	2,836	68
2003/05	CUST	21	0
2003/04	TOSI	1,187	22
2003/04	SEAS	250	9
2003/04	RRUN	2,223	37
2003/04	RETO	29	1

2003/04	RDEL	1,597	5
2003/04	MSET	152	9
2003/04	FINL	2,709	52
2003/04	CUST	10	0
2003/03	TOSI	1,125	26
2003/03	SEAS	97	4
2003/03	RRUN	2,329	30
2003/03	RETO	13	0
2003/03	RDEL	1,821	7
2003/03	MSET	168	5
2003/03	FINL	2,303	44
2003/03	CUST	26	1
2003/02	TOSI	1,418	29
2003/02	SEAS	3	0
2003/02	RRUN	2,712	70
2003/02	RETO	15	0
2003/02	RDEL	1,167	11
2003/02	MSET	217	12
2003/02	FINL	1,743	75
2003/02	CUST	20	0
2003/01	TOSI	1,673	30
2003/01	SEAS	7	0
2003/01	RRUN	2,923	98
2003/01	RETO	24	0
2003/01	RDEL	587	2
2003/01	MSET	268	19
2003/01	FINL	1,841	81
2003/01	CUST	23	1
2002/12	TOSI	2,063	32
2002/12	SEAS	8	0
2002/12	RRUN	2,682	73
2002/12	RETO	28	0
2002/12	RDEL	628	9
2002/12	MSET	357	13
2002/12	FINL	1,693	64
2002/12	CUST	15	0
2002/11	TOSI	2,879	41
2002/11	SEAS	4	0
2002/11	RRUN	2,431	199
2002/11	RETO	57	5
2002/11	RDEL	1,101	6
2002/11	MSET	499	30
2002/11	FINL	1,612	178
2002/11	CUST	23	2
2002/10	TOSI	3,845	78
2002/10	SEAS	8	0
2002/10	RRUN	2,600	115
2002/10	RETO	63	0
2002/10	RDEL	1,864	22
2002/10	MSET	592	44
2002/10	FINL	1,948	99
2002/10	CUST	38	8

2002/09	TOSI	1,738	37
2002/09	SEAS	11	0
2002/09	RRUN	2,214	30
2002/09	RETO	35	0
2002/09	RDEL	875	6
2002/09	MSET	278	9
2002/09	FINL	2,050	37
2002/09	CUST	30	1
2002/08	TOSI	1,540	37
2002/08	SEAS	10	0
2002/08	RRUN	2,913	117
2002/08	RETO	26	0
2002/08	RDEL	898	7
2002/08	MSET	214	16
2002/08	FINL	2,489	117
2002/08	CUST	30	2
2002/07	TOSI	1,190	21
2002/07	SEAS	36	1
2002/07	RRUN	3,025	29
2002/07	RETO	26	1
2002/07	RDEL	975	6
2002/07	MSET	207	6
2002/07	FINL	2,982	27
2002/07	CUST	29	0
2002/06	TOSI	877	18
2002/06	SEAS	122	4
2002/06	RRUN	2,356	16
2002/06	RETO	38	1
2002/06	RDEL	790	2
2002/06	MSET	275	20
2002/06	FINL	2,439	29
2002/06	CUST	12	1
2002/05	TOSI	992	21
2002/05	SEAS	252	4
2002/05	RRUN	2,697	37
2002/05	RETO	35	0
2002/05	RDEL	1,324	13
2002/05	MSET	348	30
2002/05	FINL	2,932	60
2002/05	CUST	9	2
2002/04	TOSI	935	16
2002/04	SEAS	247	6
2002/04	RRUN	2,335	72
2002/04	RETO	33	2
2002/04	RDEL	1,400	3
2002/04	MSET	315	63
2002/04	FINL	2,685	76
2002/04	CUST	13	0
2002/03	TOSI	1,059	12
2002/03	SEAS	25	1
2002/03	RRUN	2,495	103
2002/03	RETO	24	1

2002/03	RDEL	1,142	8
2002/03	MSET	304	14
2002/03	FINL	2,061	115
2002/03	CUST	14	2
2002/02	TOSI	1,450	11
2002/02	SEAS	1	0
2002/02	RRUN	2,646	60
2002/02	RETO	30	0
2002/02	RDEL	870	1
2002/02	MSET	492	39
2002/02	FINL	1,764	106
2002/02	CUST	8	1
2002/01	TOSI	1,569	28
2002/01	SEAS	2	0
2002/01	RRUN	2,724	74
2002/01	RETO	49	0
2002/01	RDEL	1,228	12
2002/01	MSET	560	41
2002/01	FINL	1,768	61
2002/01	CUST	7	0
		377,592	11,689

% Appointments Missed

0.03