

**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 )

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**ATMOS ENERGY CORPORATION'S SUPPLEMENTAL RESPONSE TO  
SECOND DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE AND  
PROTECTION DIVISION TO ATMOS ENERGY CORPORATION**

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**INTRODUCTION**

In accordance with *Tennessee Rule of Civil Procedure* 26.05(2), Atmos Energy Corporation ("Atmos") submits this Supplemental Response to the Second Discovery Request from the Consumer Advocate and Protection Division ("CAPD" and "CAPD Second Discovery Request(s)"). Specifically, Atmos is supplementing its prior response to CAPD First Discovery Request Part I.

**SUPPLEMENTAL AND AMENDED RESPONSE**

**PART 1: QUESTIONS REGARDING WITNESSES AND DOCUMENTS**

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, chart notes, tests, test results, interview notes, and consultation 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.

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 Atmos contends support the factual assertions, conclusions, or opinions of any Atmos witness in this matter.

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 Atmos witness in evaluating, reaching conclusions, or formulating an opinion in this matter.

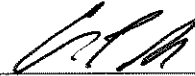
7. Please produce copies of all documents -- including, without limitation,

workpapers, spreadsheets, summaries, charts, notes, and exhibits -- created by or for or prepared by or for any Atmos witness in evaluating, reaching conclusions, or formulating an opinion in this matter.

**RESPONSE:** Atmos earlier indicated that it intended to call Donald Roff as an expert witness at the Phase One hearing in this docket, and reserved its right to supplement its discovery. Please see attached discovery, which supplements the earlier response.

Respectfully Submitted,

BAKER, DONELSON, BEARMAN  
CALDWELL & BERKOWITZ



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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 14th day of August, 2006.


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