

**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 SECOND 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)(5).

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)(5)

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 and produced the response time for all order types. (*See also* 8/7/2006 Atmos Energy's Supplemental And Amended Responses To The First Discovery Requests From The CAD (explaining that the data requested is not kept in the ordinary course and is not normally requested). To compile the information, Atmos had to construct a search and query its system.

Atmos has since learned that the initial search, which was constructed broadly, included order types that could not be considered "emergencies." After Atmos became aware that the search results initially produced did not accurately reflect the information requested, it refined its search to include only those orders classified as "emergencies":

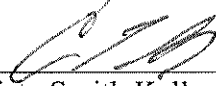
CODE	ORDER TYPE
CARB	Carbon Monoxide
CUTL	Cut Line
FIRE	Fire
LEAK	Gas Leak

The corrected information shows that the Average Response to Emergency Calls was **39.44 minutes**. This search results in a response time that is more indicative of Atmos' true response time to emergencies and should supplant the earlier information produced.

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

Respectfully Submitted,

BAKER, DONELSON, BEARMAN
CALDWELL & BERKOWITZ



Misty Smith Kelley, TN BPR # 19450

Clinton P. Sanko, TN BPR # 023354

1800 Republic Centre

633 Chestnut Street

Chattanooga, TN 37450-1800

(423) 209-4148

(423) 752-9549

mkelley@bakerdonelson.com

csanko@bakerdonelson.com

Attorneys for ATMOS Energy Corporation

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 17th day of August, 2006.

Vance L. Broemel
Joe Shirley
Cynthia Kinser
Office of Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202

Gary Hotvedt
General Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Henry Walker
Boult, Cummings, Conners & Berry
1600 Division Street, Suite 700
P.O. Box 340025
Nashville, TN 37203

J.W. Luna
Jennifer Brundige
Farmer & Luna
333 Union Street, Suite 300
Nashville, TN 37201

Melvin Malone
Miller & Martin
2300 One Nashville Place
150 4th Avenue North
Nashville, TN 37219-2433



YEARMO	SO	AVG
2002/01	CARB	54
2002/01	CUTL	55
2002/01	FIRE	45
2002/01	LEAK	50
2002/02	CARB	45
2002/02	CUTL	60
2002/02	FIRE	78
2002/02	LEAK	44
2002/03	CARB	48
2002/03	CUTL	45
2002/03	FIRE	50
2002/03	LEAK	45
2002/04	CARB	46
2002/04	CUTL	46
2002/04	FIRE	40
2002/04	LEAK	41
2002/05	CARB	57
2002/05	CUTL	48
2002/05	FIRE	26
2002/05	LEAK	43
2002/06	CARB	44
2002/06	CUTL	49
2002/06	FIRE	23
2002/06	LEAK	40
2002/07	CARB	45
2002/07	CUTL	57
2002/07	FIRE	48
2002/07	LEAK	44
2002/08	CARB	44
2002/08	CUTL	39
2002/08	FIRE	39
2002/08	LEAK	44
2002/09	CARB	60
2002/09	CUTL	57
2002/09	FIRE	23
2002/09	LEAK	44
2002/10	CARB	57
2002/10	CUTL	45
2002/10	FIRE	22
2002/10	LEAK	43
2002/11	CARB	47
2002/11	CUTL	46
2002/11	FIRE	55
2002/11	LEAK	42
2002/12	CARB	43
2002/12	CUTL	36
2002/12	FIRE	50
2002/12	LEAK	40
2003/01	CARB	43
2003/01	CUTL	51
2003/01	FIRE	27

2003/01	LEAK	41
2003/02	CARB	42
2003/02	CUTL	37
2003/02	FIRE	19
2003/02	LEAK	39
2003/03	CARB	41
2003/03	CUTL	38
2003/03	FIRE	32
2003/03	LEAK	39
2003/04	CARB	47
2003/04	CUTL	36
2003/04	FIRE	41
2003/04	LEAK	39
2003/05	CARB	58
2003/05	CUTL	43
2003/05	FIRE	42
2003/05	LEAK	40
2003/06	CARB	39
2003/06	CUTL	40
2003/06	FIRE	34
2003/06	LEAK	41
2003/07	CARB	44
2003/07	CUTL	58
2003/07	FIRE	41
2003/07	LEAK	42
2003/08	CARB	36
2003/08	CUTL	60
2003/08	FIRE	35
2003/08	LEAK	42
2003/09	CARB	39
2003/09	CUTL	48
2003/09	FIRE	34
2003/09	LEAK	42
2003/10	CARB	39
2003/10	CUTL	33
2003/10	FIRE	41
2003/10	LEAK	39
2003/11	CARB	50
2003/11	CUTL	33
2003/11	FIRE	37
2003/11	LEAK	40
2003/12	CARB	49
2003/12	CUTL	45
2003/12	FIRE	32
2003/12	LEAK	37
2004/01	CARB	39
2004/01	CUTL	32
2004/01	FIRE	36
2004/01	LEAK	35
2004/02	CARB	44
2004/02	CUTL	50
2004/02	FIRE	25

2004/02	LEAK	33
2004/03	CARB	32
2004/03	CUTL	32
2004/03	FIRE	23
2004/03	LEAK	33
2004/04	CARB	36
2004/04	CUTL	41
2004/04	FIRE	26
2004/04	LEAK	32
2004/05	CARB	45
2004/05	CUTL	48
2004/05	FIRE	34
2004/05	LEAK	35
2004/06	CARB	40
2004/06	CUTL	39
2004/06	FIRE	32
2004/06	LEAK	35
2004/07	CARB	52
2004/07	CUTL	38
2004/07	FIRE	34
2004/07	LEAK	36
2004/08	CARB	35
2004/08	CUTL	31
2004/08	FIRE	30
2004/08	LEAK	34
2004/09	CARB	29
2004/09	CUTL	40
2004/09	FIRE	40
2004/09	LEAK	36
2004/10	CARB	40
2004/10	CUTL	34
2004/10	FIRE	37
2004/10	LEAK	36
2004/11	CARB	44
2004/11	CUTL	32
2004/11	FIRE	49
2004/11	LEAK	35
2004/12	CARB	36
2004/12	CUTL	51
2004/12	FIRE	33
2004/12	LEAK	37
2005/01	CARB	36
2005/01	CUTL	43
2005/01	FIRE	29
2005/01	LEAK	35
2005/02	CARB	33
2005/02	CUTL	34
2005/02	FIRE	37
2005/02	LEAK	32
2005/03	CARB	33
2005/03	CUTL	30
2005/03	FIRE	29

2005/03	LEAK	33
2005/04	CARB	38
2005/04	CUTL	34
2005/04	FIRE	33
2005/04	LEAK	33
2005/05	CARB	36
2005/05	CUTL	35
2005/05	FIRE	27
2005/05	LEAK	34
2005/06	CARB	38
2005/06	CUTL	28
2005/06	FIRE	32
2005/06	LEAK	34
2005/07	CARB	31
2005/07	CUTL	39
2005/07	FIRE	38
2005/07	LEAK	34
2005/08	CARB	44
2005/08	CUTL	36
2005/08	FIRE	30
2005/08	LEAK	34
2005/09	CARB	56
2005/09	CUTL	36
2005/09	FIRE	34
2005/09	LEAK	34
2005/10	CARB	53
2005/10	CUTL	40
2005/10	FIRE	32
2005/10	LEAK	38
2005/11	CARB	37
2005/11	CUTL	32
2005/11	FIRE	33
2005/11	LEAK	36
2005/12	CARB	33
2005/12	CUTL	30
2005/12	FIRE	28
2005/12	LEAK	36

Average Response **39.44 Minutes**