

Before the

TENNESSEE REGULATORY AUTHORITY

IN RE:

PETITION OF TENNESSEE - ATMOS ENERGY COPORATION

DOCKET NO. 05-00258

**REBUTTAL TESTIMONY
OF
MICHAEL D. CHRYSLER**

August 18, 2006

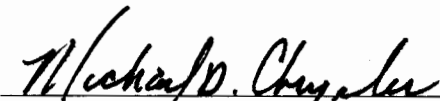
BEFORE THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

IN RE: ATMOS ENERGY COPORATION

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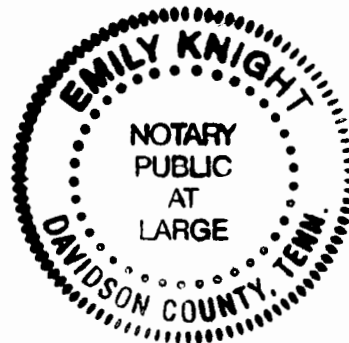
I, Michael D. Chrysler, Regulatory Analyst, for the Consumer Advocate Division of the Attorney General's Office, hereby certify that the attached Rebuttal Testimony represents my opinion in the above-referenced case and the opinion of the Consumer Advocate Division.


MICHAEL D. CHRYSLER

Sworn to and subscribed before me
this 17th day of August, 2006.


NOTARY PUBLIC

My commission expires: Sept. 22, 2007



My Commission Expires SEPT. 22, 2007

CAPD Rebuttal Testimony - Michael D. Chrysler

August 18, 2006

Q. What is the scope and purpose of your rebuttal testimony?

A. My testimony represents the views of the Consumer Advocate and Protection Division (CAPD) regarding certain Operating Processes and Procedures of ATMOS and rebuts the testimony filed by Ms. Childers and Mr. Paris.

Q. Please provide a summary of your testimony.

A. The following testimony provides an overview of the company's operating perspective since last reviewed in general rate proceedings as "United Cities Gas Company". The perspective covers: 1) a proposal for achieving replacement of the approximate 85 miles of bare steel without the need for an additional tracking mechanism; 2) a proposal for requesting ATMOS to report monthly regarding certain pre-determined service metrics covering a cross section of the operating functions including: Call Center (Customer Service) operations, Field Services, Construction, and Meter Services; 3) requesting an investigation of ATMOS shut off operating procedures in view of the potential high energy costs this forthcoming heating season in the spirit of the mitigation strategies in TRA Docket 05 - 00281; 4) establishment of a TRA order regarding third- party billing on Tennessee Regulated energy and water utilities and the responsibilities of the utility's currently billing for third parties without TRA approval to insure customer protections; and 5) analysis of customer service issues.

1. Bare Steel Pipeline Replacement:

Q. Please address the issues regarding completion of the bare steel mains in Tennessee

A. ATMOS has approximately 85 miles of bare steel pipe in various states of condition. Replacement quantity of the pipe has taken place through negotiations between the TRA Gas Pipeline Safety Division and ATMOS and reflects the operational priorities of the utility, as exhibited by the varying lengths of pipe replaced on CAPD Rebuttal MDC-1. From 1997 to 2004, the company (ATMOS and United Cities) replaced from 6,403 to some 44,658 feet per year of main.

Q. Do the Operational Priorities for bare steel replacement vary between the utilities in Tennessee?

A. Yes, ATMOS, Chattanooga Gas, and Nashville each had about 100 miles of bare steel pipe as presented in my exhibits in the CGC 04-00034 docket in 2004. Since that time, Nashville Gas made a management decision to complete the replacement of their approximate 90 miles of main in one year, Chattanooga Gas has 82 miles¹ of main and ATMOS approximately 85 miles remaining to be replaced.

Q. What is your recommendation regarding the remaining unprotected bare steel pipe of ATMOS in Tennessee?

A. My recommendation is that the TRA mandate the replacement of the approximate

¹ Testimony of Richard Lonn in TRA Docket 06-00175, p.2

1 85 miles of remaining bare steel pipe (at a rate of 45,000 feet per year) in keeping
2 with the 45,000 feet being replaced in fiscal year 2006 following discussions
3 between ATMOS and the Gas Pipeline Safety Division of the TRA (**CAPD**
4 **MDC Exhibit BS 2**). The 45,000 feet per year mandate would equate to a 10-
5 year replacement completion of all bare steel pipe (**CAPD Exhibit MDC AA**).
6 Further, this recommendation fits the response by ATMOS to my CAPD Data
7 Request #1, Part II, 4 (**CAPD MDC Exhibit BS1**): “Please provide the expected
8 miles of Bare Steel/Cast Iron gas mains and services per year until all such mains
9 and services are replaced in Tennessee.” ATMOS response: “In TN jurisdiction
10 Company projects to replace approximately 45,000 ft. of bare steel over the next
11 10-year period.”

12 **Q. Is your proposal viable for ATMOS?**

13 A. Yes, as referenced previously, the forecasted replacement reflects the discussions
14 between the TRA Pipeline Safety Division and ATMOS and memorialized in my
15 exhibit, (CAPD Exhibit MDC BS 2) to replace 45,000 feet of bare steel pipe in
16 FY 2006 with an estimated annual cost of approximately \$1.3 million. (See
17 attached Rebuttal Exhibit MDC-1). Also, the Company itself acknowledges that
18 it plans to replace 45,000 feet of pipe annually for the next ten years. My proposal
19 simply requests the Authority to formalize this commitment through the orders
20 that it enters in this docket.

21 **Q. How would the bare steel replacement schedule work?**

22 A. As the current practice, the TRA Gas Pipeline Safety Staff would meet in

1 consultation with company officials and develop an annual replacement schedule
2 of 8.5 miles per year with specific replacement projects prioritized on the analysis
3 of the system needs.

4 **Q. Do you have an opinion regarding the appropriateness of the recovery of**
5 **Pipeline Replacement Costs?**

6 A. As will be discussed by CAPD witness Mr. Buckner, the Consumer Advocate and
7 Protection Division is using ATMOS provided replacement costs of \$1,455,000
8 for FY 2006 (*vs. \$1.3 million proposed to the TRA on 4/21/06*) and \$1,800,000 for FY
9 2007.

10 **Q. Has Nashville Gas completed its replacement of bare steel pipe?**

11 A. Yes.

12 **Q. Did Nashville Gas use a tracker?**

13 A. No. Nashville Gas was able to complete its replacement program without the use
14 of a tracker in 2005. We believe that ATMOS can too.

15 **Q. Do you have an opinion regarding ATMOS' Recovery Tracker?**

16 A. From the CAPD perspective, please review the attached chart (CAPD Rebuttal
17 MDC - 2) from Dr. Brown's initial filing reflected in column "ATMOS R.O.E. In
18 TN" indicating the returns by ATMOS compared with the miles of pipe replaced.
19 There is no correlation between replacement and return by the Company. The
20 CAPD is alleging overearnings of over \$12 million annually. Further, according
21 to ATMOS' own records (as reflected in my Rebuttal Exhibit 1), ATMOS has
22 replaced \$4,034,617 in pipe (replacing 151,376 feet of pipe) during the past 8-

1 years without the need for a tracker. Further, according to Dr. Brown's testimony
2 (CAPD Rebuttal MDC - 2) that during those 8 years, ATMOS continued to over
3 earn in Tennessee. ATMOS should have no difficulty adequately absorbing the
4 modest annual depreciation and interest costs associated with main replacement
5 costs while continuing to maintain adequate returns. However, ATMOS would
6 continue to have the option of utilizing traditional ratemaking principles should
7 any additional revenues be necessary.

8 **2. Service Metrics:**

9 **Q. Could you summarize the CAPD proposal for Service Metrics and**
10 **Reporting?**

11 A. Yes, consumers need the assurance of service quality commitment and reporting
12 on a going forward basis. The need for regulators and utility commitment to
13 Service Quality is referenced by the NASUCA Resolution: "Minimum Service
14 Quality Standards Resolution" identified in CAPD EXHIBIT MDC SQ which I
15 sponsored as Chair of the NASUCA Consumer Protection Committee. The TRA
16 should adopt the proposed service metrics identified in CAPD Exhibits CS, SD,
17 DC, And MS and request the company report on a monthly basis.

18 **Q. Is it true that ATMOS and other Tennessee utilities internally report**
19 **functions (service quality reporting) on a regular basis?**

20 A. Yes, in response to CAPD Second Discovery Requests, "ATMOS does maintain
21 Call Center metrics and has provided this information to the TRA upon request.

1 We believe our metrics in this area are some of the best in the industry”².

2 Certainly Tennessee consumers, and the CAPD should have access to the reported
3 statistics to these metrics.

4 **Q. Why do other functions besides the Call Center need to report performance**
5 **in keeping with established metrics?**

6 A. Call Center service metrics are important but only encompass one aspect of the
7 utility business. Other service functions need to report performance based on
8 metrics applicable to their functions; i.e., Field Services, Meter Reading, and
9 Construction are areas that also need to report performance so that the Company
10 can objectively report service levels to their customers, the Authority, and
11 interested parties.

12 **Q. Do you have an opinion about the frequency that ATMOS should report the**
13 **service metrics in your proposal?**

14 A. Yes, ATMOS responses (as reflected on CAPD Exhibits CS, SD, CD, MS)
15 indicate that the Company could regularly respond to most of the metrics
16 proposed. We urge the Authority to adopt service metrics and ask that they be
17 reported monthly. As bills get larger and larger and as service reliability questions
18 arise, coupled with out-of-state and out-of-the country service moves, service
19 metrics and reporting will help assure that the Company’s service commitment
20 remains at an acceptable level.

² ATMOS response to CAPD data request #2, Part III, Q. 12, 3 p. 15

3. Shut off Procedures:

Q. Why is the Consumer Advocate and Protection Division requesting a TRA Investigation of ATMOS' Shutoff Procedures?

A. Following the disasters on the Gulf Coast late last Summer, energy prices rose to some of the highest levels ever. The TRA and the regulated gas companies in Tennessee came together to mitigate potential effects of the high energy costs. Tennessee Regulatory Authority docket 05-00281 provided the forum. From this docket a series of steps were taken by the gas companies, including new shutoff, credit and collection procedures, and "equal payment plan" modifications. Further, the gas companies provided the TRA with statistics indicating the number of shut offs compared with the previous year thus indicating the success of their new shutoff mitigation efforts. Of the three companies, Chattanooga Gas and Nashville Gas reduced³ their shut offs by 31% and 47%, respectively; however **ATMOS increased their shut offs by 14%!**

Since the potential for high energy costs may occur again this year, increasing the potential for instances of shut offs to lower income customers, I asked ATMOS to suggest an answer for the increase with the idea of taking corrective action during the forthcoming heating season. There is no concrete expression of an idea to remedy the situation as related in ATMOS' response to my data request:

ATMOS supplied guidelines consistent with the discussions by the three regulated gas utilities and the Directors of the Tennessee Regulatory

³Gas Companies Monthly Terminations and budget Billing Customers, October 2005 - March 2006 including prior Year Information 05-00281, TRA website 4/26/06

1 *Authority. Customers were allowed to roll in arrears and enter the*
2 *budget billing program during the winter season to avoid disconnection.*
3 *Disconnections were made only after customers defaulted on leniency in*
4 *the Company's policy. ATMOS would not have any information on*
5 *Chattanooga Gas Company's and/or Piedmont Natural Gas Company's*
6 *operations with regards to disconnect this past winter season and is*
7 *unable to provide any explanation as to the differences in % of*
8 *disconnections by one utility to the other.*
9

10 *It has always been the Company's practice to communicate with its*
11 *customers in the fall and throughout the winter about the potential cost*
12 *of natural gas. In addition to news releases, bill inserts, etc. We also*
13 *print message lines promoting conservation and/or to encourage budget*
14 *billing. In special circumstances, the Company will allow payment*
15 *arrangements to avoid disconnection. (CAPD Data Request #1,15)*
16

17 **Q. What is your concern with respect to shut offs for low-income ATMOS**
18 **customers for the forthcoming heating season?**

19 A. The Company response indicates its failure to adequately develop management
20 procedures in keeping with the "mitigation spirit" to assist low-income customers
21 last Fall. If the Company is unable to improve on its performance from last
22 heating season, the TRA needs to fill the gap. Consumers served by ATMOS
23 need every opportunity to keep the heat on this Winter and disconnections need to
24 fall in concert with the statistics exhibited by CGC and Nashville Gas.

25 **4. Third-Party Billing:**

26 **Q. Why is the CAPD calling for rules for Third-Party Billing?**

27 A. ATMOS has billed⁴ Tennessee consumers for a third party's non-utility related
28 charges since 2001. Since there was no filing by the Company, the TRA may not

⁴ CAPD Exhibit MDC MI, filed with MDC Direct Testimony (ATMOS response to CAPD Data Request #1, Part II, Q. 13 & 14)

1 even know of the billing practice, the extent in Tennessee, or the nature of any
2 problems facing Tennessee consumers.

3 **Q. Can you provide a brief summary of the billing for third parties by ATMOS**
4 **in Tennessee?**

5 A. Yes, currently, ATMOS is billing⁵ 518 Tennessee consumers for “Auto Club,”
6 “Home Protection” and “Shop at Home” charges from \$5.99 to \$9.99 per month,
7 amounting to some \$46,000 per year.

8 **Q. What are the issues facing Tennessee consumers, the TRA, and interested**
9 **parties?**

10 A. The CAPD has the following concerns:

11 1) Tennessee rate payers have charges for non-utility, non-regulated service
12 included on their ATMOS bill.

13 2) Since no filing of the practice was made by ATMOS, the details of these
14 third-party billing arrangements have never been examined.

15 3) ATMOS does not independently verify customer approval before placing
16 the charge on the gas bill.

17 4) Charges placed on the bill may not be understood or authorized by the
18 billed customer.

19 5) If the billed customer has a question about the charge, ATMOS will not
20 answer the customer and will direct the customer to an “800” number.

21 6) The customer will have to call an “800” number and have the biller

⁵ Ibid

1 request removal from the ATMOS bill.

2 7) An accounting for any fees charged by ATMOS for its Third-Party billing
3 service has not been conducted.

4 **Q. Should the TRA take any action regarding third-party billing?**

5 A. Yes. The TRA should open a docket and conduct an in-depth investigation of this
6 practice. The Authority should assure proper customer protections, and require
7 advanced approval of Third party billing arrangements, and treat any revenues
8 from such activities as regulated revenues.

9 **5. Customer Service Issues:**

10 **Q. Do you have rebuttal comments to Mr. Paris' pre-filed testimony?**

11 A. Yes, Mr. Paris comments: "there have been a number of statements made
12 previously in this docket and publicly that has incorrectly implied that the
13 Company closed local offices and/or reduced the number of local employees as a
14 result of a 1997 merger with ATMOS".⁶

15 **Q. Has ATMOS closed local office and/or reduced the number of employees**
16 **since the 1997 merger?**

17 A. That depends on how one defines "closed" and what "employees" mean?

18 **Q. Can you give an example?**

19 A. Yes, ATMOS suggests that it has local offices in 10 separate locations to serve its
20 Tennessee customers. These offices include: Union City, Franklin, Columbia,

⁶ Prepared Direct Testimony of John Paris On Behalf of ATMOS Energy Corporation., p.6

1 Shelbyville, Murfreesboro, Maryville, Morristown, Johnson City, Greenville, and
2 Bristol⁷. However, in response to CAPD Data Request #2, Part III, 10(a) John
3 Paris stated: “Please see the responses to the several related questions above that
4 ask about our Murfreesboro Office. The company has not closed any local office
5 in Murfreesboro.”

6 Using Murfreesboro as an example, of the 13 employees/job
7 functions reduced since 1997, 6 were Customer Service agents
8 who answered telephones, took payments, etc. - functions that have
9 been replaced by our 24/7 Customer Support Center or by the four
10 payment centers in Murfreesboro. 4 more of these 13 were
11 associated with appliance installations, (another non-utility-related
12 function of appliance sales we no longer offer.), 2 were
13 construction employees, and 1 was in sales⁸.
14

15 **Q. Is ATMOS saying that they reduced 13 employees in Murfreesboro?**

16 A. Yes, 6 Customer Service Clerks, 4 Servicemen, 2 Construction employees, and 1
17 Salesman.

18 **Q. Could some of those jobs be absorbed by the Call Center or elsewhere?**

19 A. Potentially, the 6 Customer Service Clerks positions (or some portion) may have
20 moved to Texas; however the “field Service Personnel”; i.e., Servicemen,
21 Construction personnel were lost.

22 **Q. What is your analysis of Total Tennessee employees⁹ ?**

23 A. The attached employee level summary by year by State for contiguous states,

⁷ Ibid, p.5,6

⁸ ATMOS response to Second Set of Discovery Requests of the CAPD , Part III, Q10(a) p. 12, 13

⁹ CAPD Rebuttal MDC-5, ATMOS response to CAPD Data Request #1, Part III, Q 12

1 indicate that total ATMOS employees in Tennessee fell by 46% since 1999, from
2 388 to 210 employees.

3 **Q. Are the employees summarized, employees of the utility only?**

4 A. No. The ATMOS employees include employees of the utility and its affiliates.

5 **Q. What is the number of utility employees?**

6 A. Mr. Buckner has used 151 employees in his direct labor price out.

7 **Q. Did the CAPD ask for a monthly reporting reconciliation between the Total**
8 **employee levels from 1999 to present and the utility employee levels?**

9 A. Yes, the ATMOS response to CAPD Data Request #2, Part V, Q 2: "Please
10 provide a revised response reconciling the two (2) sets of employees (referenced
11 above) by State, By Month, By Year for ATMOS originally provided in response
12 to CAPD Data Request #1, Part H, Question 12". ATMOS response:

13 To clarify, the number given in response to 12 included those
14 employees physically located in TN that work for Mid States, also
15 included are Becky Buchanan and Allen Ashburn, considered
16 shared service out of Dallas, but they are located here. Also are the
17 Gas Control folks which are down in Franklin but are technically
18 shared service and the ATMOS Energy Services folks which are
19 not utility but are located in Franklin as well. In contrast to
20 information provided relative to titles and salaries, that only
21 included UTILITY employees (TN town employees, Cool Springs,
22 Regional offices).
23

24 **Q. Was the 830 Memorial Blvd. office closed?**

25 A. Yes, according to ATMOS response to CAPD Data Request #2¹⁰, "In 1998, 830
26 Memorial Avenue location was closed and these employees and functions were

¹⁰ Ibid, p. 10

1 moved across the street to the present location on Lokey Avenue.” (Emphasis
2 Added.)

3 **Q. Did the 830 Memorial Avenue have a local number to answer telephone**
4 **inquiries?**

5 A. Yes, see CAPD Rebuttal MDC Exhibit 4a, 4b¹¹ detailing United Cities Gas
6 Company 1998 phone number for 830 Memorial Blvd. ((615) 893-5544). Thus,
7 gas customers in 1998 were provided with a number that they could call locally
8 for service inquiries, but no local number is provided today.

9 **Q. Can an ATMOS customer call the Lokey Avenue office and get the same**
10 **service as a walk-in customer?**

11 A. No, there is no published local number.¹² The only published numbers are for the
12 Texas Call Center.

13 **Q. Does the Lokey Avenue office provide the same “in-office” functions that the**
14 **1998 Memorial Office provided?**

15 A. No. The current Lokey Avenue office does not field local telephone calls from
16 rate payers (number is unlisted) and will not take payments¹³.

17 **Q. Please describe the services provided at the other Tennessee offices.**

18 A. With the two exceptions (Maryville, TN where we have a separate
19 Customer service center downtown and an Operations Center in
20 another location and in our Division Headquarters in Cool Springs,

¹¹ LaVergne Local Phone White Pages dated January, 1998

¹² CAPD Rebuttal MDC-3 from the current Murfreesboro White Pages

¹³ ATMOS response to Second Set of Discovery Request of the CAPD, PART III, Q6) p.10

1 all of ATMOS' Tennessee offices are places where customers can
2 come in, during normal business hours on week days for all the
3 services listed in the question, except the payment of bills. In all
4 our office locations (exceptions noted) customers may come in and
5 "request new or discontinue service, have questions about their
6 bills answered and corrected¹⁴.
7

8 **Q. Are the services in the other ATMOS Tennessee offices similar to the services**
9 **provided by the Lokey Avenue office in Murfreesboro?**

10 A. Yes, they don't have local phone numbers or take payments. Other services are
11 available to walk-in traffic.

12 **Q. Does ATMOS monitor the quantity of "walk-in" customers in Tennessee?**

13 A. No, in response to CAPD Data Request #1, Part II, Question 6(A)5: "ATMOS
14 does not track customer service walk-ins."

15 **Q. In your opinion are the services provided on the local level the same as that**
16 **provided prior to the merger with United Cities?**

17 A. Without Service Metrics and reporting results for various functions of the
18 business, unbiased analysis of adequate, consistent service levels will be unknown
19 and subject to conjecture. The Authority should therefore order the reporting of
20 service metrics so that service quality issues can be adequately monitored.

21 **Q. Does that complete your rebuttal testimony?**

22 A. Yes, it does.

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¹⁴ Ibid, Q2, p. 9

Before the

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PETITION OF TENNESSEE - ATMOS ENERGY COPORATION

DOCKET NO. 05-00258

EXHIBITS

August 18, 2006

Pipeline Replacment Schedule
ATMOS Energy
05-00258

CAPD Rebuttal MDC - 1

ATMOS Main Replacement Statistics*

	Pipe Replaced Feet	Miles	Cost Per Ft.	Annual Replacement Cost	Cost Inflation	ATMOS R.O.E. In TN**
1997	44,658	8.458	\$ 25.08	\$ 1,119,984		11.8%
1998	26,616	5.041	25.59	681,129	2.03%	18.3%
1999	8,739	1.655	26.11	228,203	2.03%	8.2%
2000	7,738	1.466	26.65	206,188	2.07%	9.7%
2001	6,403	1.213	27.09	174,097	1.65%	20.7%
2002	14,500	2.746	27.74	402,300	2.40%	20.3%
2003	19,839	3.757	28.31	561,653	2.05%	18.3%
2004	22,883	4.334	28.89	661,063	2.05%	14.2%
2005	51,484	9.751	29.48	1,517,666	2.04%	
2006	44,707	8.467	30.08	1,344,787	2.04%	
2007	60,000	11.364	30.68	1,840,800	1.99%	
1997-2004	151,376	3.6	\$ 26.65	\$ 4,034,617	2.04%	
average	18,922	3.6	26.93	504,327		
10 yr. avg.	27,961	5.3	27.79	794,352		
Total 10-Year	307,567	58.251	28.41	\$ 8,737,870		

Forecasted Replacement @ 45,000 Feet Per Year

2007	45,000	8.523
2008	45,000	8.523
2009	45,000	8.523
2010	45,000	8.523
2011	45,000	8.523
2012	45,000	8.523
2013	45,000	8.523
2014	45,000	8.523
2015	45,000	8.523
2016	45,000	8.523

Total 10-Year 450,000 85.227

*Data Source ATMOS Response to CAPD data request II, Part IV, Question 5

** Dr. Brown's Schedule 7 from initial petition filing in the docket (attached)

AREA CODE 615

MURFREESBORO

ARNOLD-AUTRY

& Rhonda 3111 Mt Tabor Rd 37127	867-2917	Ashcraft Shawn 3319 Patcoke Ct	896-4154	Aulsebrook Jamie 930 Palmer Dr 37130	849-8090
er F 2006 Jones Blvd 37129	890-6486	Ashcraft Shawn M 302 N Spring St 37130	896-4154	AULTMAN'S JEWELERS	
ton 3668 Murray Kittrell Rd	896-6007	Ashford Effie 6117 Woodbury Pke 37127	907-0853	111 Public Sq 37127	893-1833
ran 2407 Anchor 37130	893-9058	Ashford J 1003 Old Lascassas Rd 37130	890-9957	Aulvin Natalie 114 Fourth Av 37130	217-6090
062 Kittrell Halls Hill Rd 37149	890-4688	Ashford J C & Mary D 314 Richland Richardson Rd	867-3879	Aune Patricia 619 Richard Rd 37129	890-6817
ly 248 Meadow Ln 37128	895-3480	Ashford Lane 2621 Deepwater Dr 37127	895-5678	Aune Patricia 619 Richard Rd 37129	890-9453
is Ray	848-2524	Ashford Lucian 615-D Bridge Av 37129	895-2356	Aune T S 619 Richard Rd 37129	904-1942
790 Asbury Ln 37129	895-0304	Ashford S 3455 Mt Tabor Rd 37127	494-4892	Aurand William & Ruth 2610 Riverstone Dr 37128	896-4394
Corinne 3106 Damsel Ct 37129	893-5440	Ashford Shirley A 2931 Halls Hill Pke 37130	494-4695	Ausburn J & S 107 Sierra Dr 37129	896-9891
ifer Renee 288 Coleman Hill Rd	217-2904	Ashley Clifford III & Dianne 4479 Cedar Grove Rd 37127	896-0140	Ausburn James W 107 Psalm Pl 37129	848-1709
ly F 529 Flat Rock Rd 37130	895-3176	Ashley Ericka 2315 Mercury Blvd 37130	896-6308		
219 Oscar Ct 37128	867-9355	Ashley Larry D 1442 Arrowhead Pl 37129	895-3671		
223 Black Bear Tr 37127	867-0545	Ashley Wren 6335 Franklin Rd 37128	217-1759		
C & Katherine R 2272 Dominion Dr 37129	848-0911	Ashmore L 207 National Dr 37128	895-1427		
W 2507 Montclair Av 37129	904-7994	Ashton Donald B 7934 Spire St 37129	890-2515		
707 Saratoga Dr 37130	896-2597	Ashworth Brian W 910 S Tennessee Blvd 38008	896-8483		
h G 3692 Old South Rd 37128	895-8629	Ashworth Manda & Dena 1447 Brinkley Rd 37128	896-9581		
yn 331 Meadow Ln 37128	217-0113	Ashworth Michael 550 Crossway Av 37130	904-9224		
9624 Cobb Rd 37037	893-6825	Ashworth S	867-0952		
1 Lynn 37129	890-1498	Ashworth Tara & Terrell 7501 Delbridge Rd 37127	896-6669		
130 Wenlon Dr 37130	895-3358	Ashworth Terry & Dene 1447 Brinkley Rd 37128	896-9584		
us 2458 Crosspark Dr 37129	890-7506	Asian Exotic Flooring			
817 N Spring St 37130	867-1729	225 W College St Murfreesboro 37130	494-9998		
ia 600 Dusan Blvd 37129	895-6556	Askew Michael 317 Jonathan Way 37127	217-0268		
e Sue 1911 Pacific Pl 37128	893-0520	Askew Michael 317 Jonathan Way 37127	895-5227		
838 Lexington Trace 37130	893-6952	Askins Agnes 515 N Walnut St 37130	890-5262		
ell 1307 Trinity Dr 37129	890-3337	Aslinger James 205 Ivanhoe Ct 37127	867-9167		
yn 331 St 37130	893-4746	Aslinger Kathy 1012 Rose Av 37130	893-4852		
l Patricia Cr 37128	494-4631	Aslinger William 8027 Westfield Dr 37129	896-3503		
l Sulphur Springs Rd 37129	893-0189	Aspinwall J 1922 Turfand Dr 37127	890-3924		
Melinda 2531 Patricia Cir 37128	494-3471	Aspinwall J 1922 Turfand Dr 37127	907-2490		
2222 Oakhaven Dr	907-9098	Aspley S 304 Kings Hwy 37129	896-8397		
ne 331 Meadow Ln 37128	895-1018	Assembly Components & Equipment	896-2777		
426 E Main St 37127	217-4695	Associated General Contractors-Middle Tennessee Branch			
	907-7032	2924 Foster Creighton Dr Nashville Tn 37204	244-6344		
02 Roy Arnold Rd 37130	896-0813	ASSOCIATES 100	890-7560		
78 Woodbury Pke 37127	893-1591	1302 Memorial Blvd 37129			
10 S Tenn Blvd 38008	893-6898	Astro & Procraft Boats 6776 Old Nashville Hwy 37129	890-1593		
rd & Cherry 2607 Walnut Ln 37129	898-1913	Asvitt-Statler Deborah 4125 Fairway Dr 37128	893-9046		
006 Wismar Ct 37130	849-3839	At Your Service 301 N Walnut St 37130	895-0197		
t F 1110 Falling Tree Ct 37130	217-9290	Atchison Richard G 3832 Snell Ct 37127	893-1599		
e & Cindy 1123 Mahogany Tr 37130	904-7993	Atech Inc 810 NW Broad St	898-0601		
av 11334 Bradyville Pke 37149	893-2185	Athens Stone Inc 850-C Park Av 37129	867-6313		
43 Flag Ct 37127	895-3950	Atkin Ashley 2312 Verona Pl 37130	904-7931		
ion 109 Pebble Brook Dr 37127	904-2538	Atkin Dustin 2312 Verona Pl 37130	896-6371		
on & Rachel 5720 Montague Av	896-4044	Atkin Larry & Cindy 2312 Verona Pl 37130	895-1198		
ne 2857 Queens Ct 37129	907-0115	Atkins M R 5213 Grassland Dr 37129	907-8274		
& Haven 504 Rucker Rd	904-0311	Atkins Bruce 2618 Albany Ct 37129	898-7232		
014 N Tennessee Blvd 37130	890-3604	Atkins Bryan & Vickie 5328 Keystone Ct 37129	898-1823		
as 105 Arnold Ln 37127	893-4077	Atkins Charles R & Edith R 217 Hillside Ct 37130	896-6249		
as F 795 Floraton Rd 37127	896-1265	Atkins Chris 5305 Keystone Ct 37129	904-1072		
J 4301 Bradyville Pke 37127	893-0610	Atkins Doug & Heather 410 Royal Glen Blvd 37128	890-6768		
9550 Rocky Hill Rd	849-9816	Atkins Eric W 2315 Mercury Blvd 37130	217-7157		
Kathi 1307 Maymont Dr 37130	896-6704	Atkins Heather 410 Royal Glen Blvd 37128	890-6769		
Walnut St Murfreesboro 37130	895-8535	Atkins Jana 1259 Wenlon Dr 37130	904-1787		
ouse Services	898-8384	Atkins Jana 1259 Wenlon Dr 37130	896-5105		
ly & Jamie 3373 Vapor Tr 37127	904-9157	Atkins K 900 E Main St 37130	907-0669		
liam 5517 Burnt Knob Rd 37129	895-3896	Atkins Lee & Callie 1011 E Jefferson Pke 37130	890-4160		
o 2303 Medford Campbell Blvd 37127	904-1788	Atkins N 634 E Main St 37130	896-2948		
so 6331 Franklin Rd	907-3082	Atkins William Warren 106 Fieldstone Dr 37127	890-9053		
7911 Dunaway's Chapel Rd	904-7711	Atkinson Bradley & Robyn 327 Shoshone Pl	217-7878		
ano 1325 Wenlon Dr 37130	217-1342	ATKINSON FAMILY DENTISTRY			
5105 Old Nashville Hwy 37129	848-9031	Attkisson Carol 6202 Lascassas Pke 37085	494-0073		
rt 313 Kingwood Ln	907-0070	Attkisson L B 411 Tremont Dr 37130	895-4085		
inet Door Company		Atlantic Mortgage Loans Inc			
din Rd Murfreesboro 37128	217-7772	201 W Main St Murfreesboro 37130	867-6663		
nnny C & Carol S 3778 Lark Ct 37129	896-7910	Atlantic Mutual 201 E Main St Murfreesboro 37130	907-8194		
i 320 W Main St Murfreesboro 37130	904-9441	Atlas Auto Glass	408-0260		
	893-3110	Atlas Insurance Agency 611 W College St 37130	890-3445		

MAGES INC

St Murfreesboro 37130	896-9667
Rent-All-	
elds Ct 37211	836-1234
ile Rd	836-1234
iding Rentals 392 Haywood Ln 37211	836-1234
Kim 1611 Dodd Tr 37128	849-9208
935 Larry Ct 37130	898-8282
Dr 807 Bradford Pl 37130	890-2446
Frances 5089 Lytle Creek Rd 37127	895-1054
ile & Granite	
age St Murfreesboro 37129	907-0390
ment Publishers & Associates Inc	
ir Christina 37037	217-9887
W College St 37130	904-2787
& Emeka 803 Netherland Dr 37130	217-0233
at 1203 Old Lascassas Rd 37130	907-3241
Knox St	867-0651
Company 2441-Q Old Fort Parkway Mrl 37128	893-6392
4 Jetton Dr 37130	895-8748
am & Micheal 706 Staley St 37129	896-4738
t & Doris 1811 Old Lascassas Rd 37130	896-2999
rinting	
age St Murfreesboro 37129	217-8388
315 Mercury Blvd 37130	867-0166
& N 1307 Barclay Ct 37128	904-8843
2918 Wellington Pl 37128	848-0880
lot 6972 Millersburg Rd	893-8777
	893-6175
Telephone	895-3006
4 Sky Harbor Dr 37129	904-6889
Ticha	890-7709
Wellington Pl 37128	867-6482
Embassy Dr 37128	849-7740
3 Wellington Pl 37128	494-0009
Bradberry Dr 37130	893-6175
t R 1712 Katelyn Ct	217-7611
topher 150 W Thompson Ln 37129	907-7181
2032 Sterling St 37127	893-4961
& Gail 3927 Cider Dr 37129	217-3371
ael & Lee 714 Floraton Rd 37127	893-1293
Ms 1206 Elliott Dr Mrl 37129	494-9198
1455 Lascassas Pke 37130	849-9858

Aultman's Jewelers	893-1833
Aulvin Natalie 114 Fourth Av 37130	217-6090
Aune Patricia 619 Richard Rd 37129	890-6817
Aune Patricia 619 Richard Rd 37129	890-9453
Aune T S 619 Richard Rd 37129	904-1942
Aurand William & Ruth 2610 Riverstone Dr 37128	896-4394
Ausburn J & S 107 Sierra Dr 37129	896-9891
Ausburn James W 107 Psalm Pl 37129	848-1709

AUSTIN AUDIO VISUAL DESIGN

707 W Main St 37129	890-2775
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AUSTIN BATHTUB REFINISHING & REPAIRS

2542 Blackman Rd 37129	895-9982
Austin Ben S & Diane 3157 Esquire Dr 37130	890-7464
Austin Betty S 1026 Gary Ct 37128	867-6709
Austin Brenda 135 Surevue Dr 37127	867-9488
Austin Brian & Jennifer 2464 Oak Hill Dr	896-9512
Austin Chris	867-1446
Austin Dan 1836 Lexington Trace 37130	890-1800
Austin David T 704 N Maple St 37130	899-4031
Austin Donald 3309 Dilton Mankin Rd 37127	895-0888
Austin Donald W 2542 Blackman Rd 37129	895-0047
Austin Doug 2004 Mikky Way 37129	867-2196
Austin Ernie 103 Honeysuckle Ct 37129	867-6590
Austin Greg & Misti	907-8867
Austin J P 707 W Main St 37129	848-5081
Austin Jeff 3014 Madison Av 37130	893-9591
Austin M J 767 Regal Dr 37129	893-4010
Austin Merri 1437 Rochester Dr 37130	895-1122
Austin Mitchell E & A L 514 Westgate Blvd 37128	893-8332
Austin Nathan & Barbara 420 Douglas Av 37129	494-4719
Austin Pamela 1821 Golden Valley Dr 37037	217-1364
Austin Richard Neal 4554 E Jefferson Pke 37085	904-7421
Austin Roger 338 Eventide Dr 37130	217-7874
Austin Russell & Penny 2518 Mission Ridge Dr 37130	867-8549
Austin Steve & Michelle 1314 Tomahawk Trac 37129	867-8734
Austin Sue 1911 SE Broad St 37130	890-9464
Austin Sue 1911 SE Broad St 37130	898-0385
Austin Tammy 1911 Saddlebrook Dr 37129	896-6623
Austin Thad 2110 Look Rock Ct 37130	895-2935
Austin V S 1722 Herald Ln 37130	893-6738
Austin W Talmage & Becky 1705 Charger Ct 37153	895-4442
Austin William C 3125 Throne 37129	895-5615
Austin William C 3125 Throne St 37129	849-3499
Auten Erica 2827 S Rutherford Blvd	893-6587
Authentic Self 1417 Mark Allen Ln Murfreesboro 37129	867-7365

AUTO ART BODY SHOP

2110 W Thompson Ln	896-9420
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AUTO COLOR SUPPLY

1803 NW Broad St 37129	893-2780
Auto Glas Unlimited 1107 Memorial Blvd 37129	895-6752

AUTO GLASS JACK MORRIS

1516 Church St	327-0036
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Auto Glass Jack Morris 1516 Church St 37203	327-0036
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AUTO GLASS SERVICE LLC

131 John R Rice Blvd- Glass Replacement	867-3500
Auto-Hut Walter Hill	896-0307
Auto Insurance America LLC	
205 NW Broad St Murfreesboro 37130	893-6177
Auto Insurance Network Inc	890-0810
Auto Pride Car Wash 1810 Memorial Blvd 37129	895-3294
Auto Shine Of Murfreesboro 531 NW Broad St 37130	904-0900

AUTO SHOPPE THE

2315 NW Broad St Murfreesboro 37129	890-5746
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Auto Shoppe Towing & Recovery	
2315 NW Broad St Murfreesboro 37129	890-5746
Auto Shoppe Towing & Recovery	494-0701
Auto Source 1607 NW Broad St 37129	895-9006
Auto Value-	
5231 Murfreesboro Rd Lvrn	793-7600
1403 NW Broad St 37129	890-9654

AUTOGLAS UNLIMITED

1107 Memorial Blvd 37129	895-6752
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Autohaus Of Murfreesboro	
250 Samsonite Blvd Murfreesboro 37129	896-8772
Autoinsurance Network Inc	890-0810
AUTOMART 4447 Veals Rd 37127	890-6527

Automobiles 365.Com	
1740 NW Broad St Murfreesboro 37129	895-0407
Automotive Bodyshop Supply 1030 W College St 37129	893-1039
Automotive Service 1414 NW Broad St Murfreesboro 37129	893-3860
Autosports Unlimited	
1443 Memorial Blvd Murfreesboro 37129	890-0220
AutoZone-	
230 SE Broad St 37130	890-7096
1729 Memorial Blvd 37129	893-6442
Autry N J 5694 Jones Ln 37127	848-1094

MURFREESBORO

Twomey Carolyn 2106 Ravenwood Dr	849-8243
Tyler B B 2411 Anchor	890-5961
Tyler Melody 910 S Tennessee Blvd	867-7625
Tyndall Timothy 106 S University St	896-4671
Tyner Bruce 607 Thatcher Ct	895-9671
Tyner William G 2260 Pitts Ln	890-5929
Tynes Chris 2251 Dominion Dr	848-6770
Tynes Edward M 679 Alsip Mill Rd Murfreesboro	890-7543
Tynes Edward M 679 Alsip Mill Rd	904-0743
Tyre Rich 1841 Lascassas Pke	904-7756
Tyree Clyde 4742 Webb Rd	890-3698
Tyree Kenneth 4710 Hickory Ln	896-3730
Tyree Teyo 314 Fourth Av	895-4348
Tyring Edward 305 Highfield Dr	896-0260
Tyson Jimmy Reverand 2019 Carolyn Ct	896-5818
Tyson Leroy Colonial Estates	893-8570
Tyson Virginia W 2019 Carolyn Ct	848-0596

U

Underwood Bill 1820 Fox Spring Ct ----- 893-4189
Underwood Brandi 2311 E Main St ----- 895-1895
Underwood CP 2554 Concord Ct ----- 898-0010
Underwood Cathy 6826 Jap Johnson Rd ----- 895-9834
Underwood Craig 2718 Crazy Horse ----- 898-7564
Underwood Donna 1009 Christy Ct ----- 898-1044
Underwood Fred A 148 Gresham Ln ----- 890-4710
Underwood Grady 5007 Sharpsville Rd ----- 893-1888
Underwood J L 2718 Crazy Horse ----- 895-7080
Underwood J S 507 Eventide Dr ----- 849-3733
Underwood James T 1910 RusseH Dr ----- 895-4692
Underwood Jerry L 2718 Crazy Horse ----- 893-5451
 FAX Line 2718 Crazy Horse ----- 848-6726
Underwood Jesse 1210 Glaze Ct ----- 893-7918
Underwood John C 2024 Stonebrook Dr ----- 895-7144
Underwood John T 5770 Franklin Rd ----- 895-0421
Underwood M Andrew 3906 Southridge Blvd ----- 890-4314
Underwood M G 1414 N Tennessee Blvd ----- 893-4368
Underwood Mary Ann CPA 307 N Walnut ----- 893-9334
Underwood Olene 3977 Lebanon Pke ----- 893-4091
Underwood Ray 315 Black Bear Tr ----- 893-6855
Underwood Richard 1430 River Rock Blvd ----- 895-9095
Underwood Robert 478 Barfield Crescent Rd --- 890-8947
Underwood Robert L 1811 Brighton Dr ----- 893-7809
Underwood Roger 5266 Midland Rd ----- 895-5839
Underwood S 205 Warrior Dr ----- 896-2909
Underwood Susan 817 Lillard Rd ----- 895-3261
Underwood Terry 506 Kings Ridge Dr ----- 849-9338
Underwood Thomas R 6926 Jap Johnson Rd --- 895-4389
Uni Distribution 1928 Ivy Glen Dr ----- 896-8992
UniFirst 71 Fesslers Ln Nashville
 ----- Charges Will Apply Dial 1 & Then 255-0535
Union Planters Bank—
 Main Office 1861 Memorial Blvd ----- 896-0111
 Customer Service ----- 726-4358
 706 S Church St ----- 895-3055
 259 N Main St Eagleville Tn ----- 274-6285
Union Planters Mortgage
 One Burton Hills Blvd Nashville ----- 665-1060
Unionville Termite & Pest Control ----- 849-3063
Unique Properties 142 Heritage Park Dr ----- 890-8004
United Auto Recovery & Delivery
 1303 W College St ----- 848-1202
United Cellular Inc 517 W Main ----- 849-1420
United Cities Gas Co 830 Memorial Blvd ----- 893-5544
United Cities Propane Gas
 850 N Thompson Ln ----- 890-9354
United Grocery Outlet 117 SE Broad St ----- 849-3545
United Hometown Builders LLC
 316 W Lytle St ----- 890-4479
United Pentecostal Church
 1800 Lascassas Pke ----- 893-5906
United Service Equipment
 Company-Division Of Standex
 International Corp 1152 Park Av ----- 893-8432
UNITED STATES GOVERNMENT—
Agriculture Department—
 Agriculture Service Center—
 Agriculture Stabilization &
 Conservation Service
 410 New Salem Rd ----- 893-9295
 Natural Resources Conservation
 Service 410 New Salem Rd ----- 893-9297
USDA—
 National Appeals Division
 2220 Sassafras Dr ----- 895-2707
Air Force Recruiting Service
 272 Heritage Park Dr ----- 896-0248
Army Department Of—
 Recruiting Station 272 Heritage Park Dr --- 890-1810
Health & Human Services Department
 Of—
 Medicare—
 Medicare Part A Information—
 Dialysis Only—
 Blue Cross Blue Shield Of Georgia
 Inc—
 For Beneficiary Use Only ----- 706 322-4082
 For Provider Use Only
 Toll Free-Dial '1' & Then ----- 800 322-3380
 Palmetto Government Benefits
 Administration—
 Home Health Claims Information—
 Provider Use Only ----- 803 736-4730
 Beneficiary Use Only
 Toll Free-Dial '1' & Then ----- 800 521-3761

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Vergne

AREA CODE 615

JANUARY, 1998

ner Service Number: 615-793-7741
Toll Free: 1-800-793-7742
air Service Number: 615-793-7111



Summary of ATMOS Employee Count By State, By Month

June, 1999 - June, 2006

Response to CAPD Data Request 1, Part II, Question 12 Employee count by month

Georgia			Kentucky			Mississippi			Tennessee			Virginia		
Mo/Yr	Employee Count		Mo/Yr	Employee Count		Mo/Yr	Employee Count		Mo/Yr	Employee Count		Mo/Yr	Employee Count	
Jun-99	95			268			509			388			32	
Jun-00	92			260			534			363			31	
Jun-01	90			247			596			229			29	
Jun-02	86			248			630			223			30	
Jun-03	85			241			583			223			30	
Jun-04	84			238			530			221			27	
Jun-05	82			239			481			199			34	
Jun-06	79			238			443			210			31	
Red. from 1999	16	17%		30	11%		66	13%		178	46%		1	3%
State	Year-Month	Total	KY	MS	TN	VA								
GA	1999-06	95		268	509			1999-06	388		1999-06		32	
	1999-07	95		267	510			1999-07	379		1999-07		31	
	1999-08	93		266	512			1999-08	381		1999-08		30	
	1999-09	93		265	518			1999-09	379		1999-09		30	
	1999-10	93		265	518			1999-10	377		1999-10		31	
	1999-11	93		264	521			1999-11	378		1999-11		31	
	1999-12	93		264	521			1999-12	378		1999-12		31	
	2000-01	93		264	524			2000-01	381		2000-01		31	
	2000-02	93		262	525			2000-02	378		2000-02		31	
	2000-03	92		261	528			2000-03	374		2000-03		31	
	2000-04	92		261	529			2000-04	369		2000-04		31	
	2000-05	92		260	532			2000-05	366		2000-05		31	
	2000-06	92		260	534			2000-06	363		2000-06		31	
	2000-07	92		259	539			2000-07	368		2000-07		31	