



BOULT ■ CUMMINGS®
CONNERS ■ BERRY PLC

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August 28, 2006

Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
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filed electronically in Docket Office on 08/28/06 @ 3:01pm

Re: *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 Number: 05-00258

Dear Director Jones:

Enclosed are two exhibits Atmos Intervention Group ("AIG") witness Mr. Hal Novak will discuss as part of the summary of his pre-filed testimony. The exhibits contain comparative information about the tariffs and customer usage patterns from Nashville Gas, Chattanooga Gas and Atmos and, as promised in Mr. Novak's rebuttal (p. 2, lines 7-15), calculates the size of AIG's proposed rate blocks in the commercial and industrial classes and customer usage in each rate block.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/djc
Enclosures

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being forwarded via U.S. mail, to:

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on this the 28th day of August 2006.

Henry Walker

Atmos Intervention Group
Comparison of Monthly Usage Blocks for Commercial Customers

Schedule 1

	<u>Dkt</u>	<u>%</u>
Chattanooga Gas Company:		
Step 1 - First 300 Dkt/Month	2,821,242	68.97%
Step 2 - Next 200 Dkt/Month	312,349	7.64%
Step 3 - Next 1000 Dkt/Month	549,082	13.42%
Step 4 - Over 1500 Dkt/Month	408,063	9.98%
Total	<u>4,090,736</u>	<u>100.00%</u>

Rate Design Volumes Adopted by the TRA in Docket 04-00034.

	<u>Dkt</u>	<u>%</u>
Nashville Gas Company:		
SGS Value (332)		
Step 1 - First 200 Dkt/Month	2,271,641	82.57%
Step 2 - Over 200 Dkt/Month	479,549	17.43%
Total	<u>2,751,190</u>	<u>100.00%</u>
SGS Standard (302)		
All Consumption	<u>3,828,338</u>	<u>100.00%</u>
MGS Value (362)		
Step 1 - First 500 Dkt/Month	141,928	61.49%
Step 2 - Over 500 Dkt/Month	88,871	38.51%
Total	<u>230,799</u>	<u>100.00%</u>
MGS Standard (352)		
All Consumption	<u>24,323</u>	<u>100.00%</u>
Total Commercial	<u>6,834,650</u>	

Rate Design Volumes Adopted by the TRA in Docket 03-00313.

Atmos Energy Corporation:

Current Tariff:

No Usage Blocks

AIG Proposed Tariff:

	<u>%</u>
Step 1 - First 500 Mcf/Month	72.32%
Step 2 - Over 500 Mcf/Month	27.68%
Total	<u>100.00%</u>

Source: Schedule 3

Atmos Intervention Group
Comparison of Monthly Usage Blocks for Industrial Customers

Schedule 2

	<u>Dkt</u>	<u>%</u>
Chattanooga Gas Company:		
Step 1 - First 1500 Dkt/Month	1,222,407	15.97%
Step 2 - Next 2500 Dkt/Month	1,654,901	21.62%
Step 3 - Next 11000 Dkt/Month	2,540,951	33.19%
Step 4 - Over 15000 Dkt/Month	2,236,982	29.22%
Total	<u>7,655,241</u>	<u>100.00%</u>

Rate Design Volumes Adopted by the TRA in Docket 04-00034.

	<u>Dkt</u>	<u>%</u>
Nashville Gas Company:		
Step 1 - First 1500 Dkt/Month	2,637,903	27.58%
Step 2 - Next 2500 Dkt/Month	1,791,305	18.73%
Step 3 - Next 5000 Dkt/Month	1,400,506	14.64%
Step 4 - Over 9000 Dkt/Month	3,736,442	39.06%
Total	<u>9,566,156</u>	<u>100.00%</u>

Rate Design Volumes Adopted by the TRA in Docket 03-00313.

Atmos Energy Corporation:

	<u>Mcf</u>	<u>%</u>
Current Tariff:		
Step 1 - First 2000 Mcf/Month	2,050,509	32.81%
Step 2 - Next 48000 Mcf/Month	4,199,549	67.19%
Step 3 - Over 50000 Mcf/Month	0	0.00%
Total	<u>6,250,058</u>	<u>100.00%</u>

	<u>Mcf</u>	<u>%</u>
AIG Proposed Tariff:		
Step 1 - First 1000 Mcf/Month	1,042,580	16.68%
Step 2 - Next 2100 Mcf/Month	1,695,253	27.12%
Step 3 - Next 6000 Mcf/Month	2,366,356	37.86%
Step 4 - Over 9100 Mcf/Month	1,145,869	18.33%
Total	<u>6,250,058</u>	<u>100.00%</u>

Source: Schedule 4

Atmos Energy Corporation

Analysis of Commercial Rates 220 and 230 Combined Usage

For the 12 Months Ended September 30, 2005

Schedule 3

Monthly Usage	Rate 220	Rate 230	Rate 260	Total	Percentage	Cumulative Percentage
0 - 100 Ccf	8,855,457	20,664	32,700	8,908,821	12.78%	12.78%
101 - 200 Ccf	5,401,871	20,245	32,700	5,454,816	7.82%	20.60%
201 - 300 Ccf	4,022,692	20,199	32,700	4,075,591	5.85%	26.45%
301 - 400 Ccf	3,208,453	20,019	32,610	3,261,082	4.68%	31.13%
401 - 500 Ccf	2,642,590	19,621	32,600	2,694,811	3.87%	34.99%
501 - 600 Ccf	2,218,820	19,271	32,600	2,270,691	3.26%	38.25%
601 - 700 Ccf	1,885,605	18,989	32,600	1,937,194	2.78%	41.03%
701 - 800 Ccf	1,620,731	18,830	32,540	1,672,101	2.40%	43.43%
801 - 900 Ccf	1,408,796	18,800	32,500	1,460,096	2.09%	45.52%
901 - 1000 Ccf	1,230,180	18,638	32,500	1,281,318	1.84%	47.36%
1001 - 2000 Ccf	7,611,448	182,562	325,000	8,119,010	11.65%	59.01%
2001 - 3000 Ccf	3,890,996	178,983	324,530	4,394,509	6.30%	65.31%
3001 - 4000 Ccf	2,339,915	174,684	323,468	2,838,067	4.07%	69.38%
4001 - 5000 Ccf	1,551,856	171,700	322,350	2,045,906	2.93%	72.32%
5001 - 6000 Ccf	1,096,875	168,662	320,314	1,585,851	2.27%	74.59%
6001 - 7000 Ccf	807,862	160,899	317,599	1,286,360	1.85%	76.44%
7001 - 8000 Ccf	614,031	156,263	314,070	1,084,364	1.56%	77.99%
8001 - 9000 Ccf	484,382	150,885	309,646	944,913	1.36%	79.35%
9001 - 10000 Ccf	365,913	139,976	303,048	808,937	1.16%	80.51%
10001 - 11000 Ccf	333,256	427,466	936,164	1,696,886	2.43%	82.94%
11001 - 21000 Ccf	1,382,440	533,756	1,425,358	3,341,554	4.79%	87.73%
21001 - 31000 Ccf	780,450	244,125	845,395	1,869,970	2.68%	90.42%
31001 - 41000 Ccf	376,529	92,035	526,387	994,951	1.43%	91.84%
41001 - 51000 Ccf	167,307	47,660	197,540	412,507	0.59%	92.44%
51001 - 61000 Ccf	95,610	0	159,280	254,890	0.37%	92.80%
61001 - 71000 Ccf	64,220	0	116,920	181,140	0.26%	93.06%
71001 - 81000 Ccf	50,040	0	60,000	110,040	0.16%	93.22%
81001 - 91000 Ccf	37,810	0	60,000	97,810	0.14%	93.36%
91001 - 101000 Ccf	26,320	0	60,000	86,320	0.12%	93.48%
101001 - 111000 Ccf	10,490	0	60,000	70,490	0.10%	93.58%
Over 111000 Ccf	51,507	5,600	4,415,740	4,472,847	6.42%	100.00%
Total	54,634,453	3,030,531	12,048,860	69,713,843		

Block 1

Block 2

SOURCE: Company response to Atmos Intervention Group's 2nd Data Request, Items 3, 4 and 7.

Atmos Energy Corporation
Analysis of Industrial Rates 240, 250, 280, 291, 292, 293 and 294 Combined Usage (Ccf)
For the 12 Months Ended September 30, 2005

Monthly Usage	Rate 240	Rate 250	Rate 280	Rate 291	Rate 292	Rate 293	Rate 294	Total	Percentage	Cumulative Percentage
0 - 100 Ccf	2,400	106,972	4,700	0	2,400	1,200	0	117,672	0.19%	0.19%
101 - 200 Ccf	2,400	105,320	4,700	0	2,400	1,200	0	116,020	0.19%	0.37%
201 - 300 Ccf	2,400	104,790	4,700	0	2,400	1,200	0	115,490	0.18%	0.55%
301 - 400 Ccf	2,400	104,390	4,700	0	2,400	1,200	0	115,090	0.18%	0.74%
401 - 500 Ccf	2,400	103,990	4,700	0	2,400	1,200	0	114,690	0.18%	0.93%
501 - 600 Ccf	2,400	103,470	4,700	0	2,400	1,200	0	114,170	0.18%	1.11%
601 - 700 Ccf	2,400	103,020	4,700	0	2,400	1,200	0	113,720	0.18%	1.29%
701 - 800 Ccf	2,400	102,740	4,700	0	2,400	1,200	0	113,440	0.18%	1.47%
801 - 900 Ccf	2,400	102,610	4,700	0	2,400	1,200	0	113,310	0.18%	1.65%
901 - 1000 Ccf	2,400	102,450	4,700	0	2,400	1,200	0	113,150	0.18%	1.83%
1001 - 2000 Ccf	24,000	1,013,852	47,000	0	24,000	12,000	0	1,120,852	1.79%	3.63%
2001 - 3000 Ccf	24,000	990,600	47,000	0	24,000	12,000	0	1,097,600	1.76%	5.38%
3001 - 4000 Ccf	24,000	979,742	47,000	0	24,000	12,000	0	1,086,742	1.74%	7.12%
4001 - 5000 Ccf	24,000	957,663	47,000	0	23,478	11,392	0	1,063,533	1.70%	8.82%
5001 - 6000 Ccf	24,000	936,177	47,000	0	20,161	10,407	0	1,037,745	1.66%	10.49%
6001 - 7000 Ccf	24,000	903,249	47,000	0	17,032	10,000	0	1,001,281	1.60%	12.09%
7001 - 8000 Ccf	24,000	881,847	47,000	0	13,273	8,677	0	974,797	1.56%	13.65%
8001 - 9000 Ccf	24,000	865,610	46,560	0	12,368	8,000	0	956,538	1.53%	15.18%
9001 - 10000 Ccf	24,000	849,960	46,000	0	12,000	8,000	0	939,960	1.50%	16.68%
10001 - 11000 Ccf	24,000	1,608,428	53,230	0	56,352	8,000	0	1,750,010	2.80%	19.48%
11001 - 21000 Ccf	239,780	7,547,049	449,200	0	31,581	61,671	0	8,329,281	13.33%	32.81%
21001 - 31000 Ccf	187,990	6,221,751	440,000	0	0	23,496	0	6,873,237	11.00%	43.80%
31001 - 41000 Ccf	133,610	5,418,500	411,430	0	0	1,317	0	5,964,857	9.54%	53.35%
41001 - 51000 Ccf	120,000	4,478,081	374,340	0	0	0	0	4,972,421	7.96%	61.30%
51001 - 61000 Ccf	120,000	3,527,062	324,450	0	0	0	0	3,971,512	6.35%	67.66%
61001 - 71000 Ccf	120,000	3,017,070	283,560	0	0	0	0	3,420,630	5.47%	73.13%
71001 - 81000 Ccf	120,000	2,507,730	260,000	0	0	0	0	2,887,730	4.62%	77.75%
81001 - 91000 Ccf	120,000	2,066,410	260,000	0	0	0	0	2,446,410	3.91%	81.67%
91001 - 101000 Ccf	116,340	3,697,880	694,150	0	0	0	0	4,508,370	7.21%	88.88%
101001 - 111000 Ccf	103,870	831,870	124,440	0	0	0	0	1,060,180	1.70%	90.58%
Over 111000 Ccf	307,001	5,009,083	574,060	0	0	0	0	5,890,144	9.42%	100.00%
Total	1,952,591	55,349,366	4,717,420	0	282,245	198,960	0	62,500,562	100.00%	

Block 1

Block 2

Block 3

Block 4

SOURCE: Company response to Atmos Intervention Group's 2nd Data Request, Items 5, 6, 7, 8, 9, 10, 11 and 12.