



BOULT ■ CUMMINGS®
CONNERS ■ BERRY PLC

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September 8, 2006

Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

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

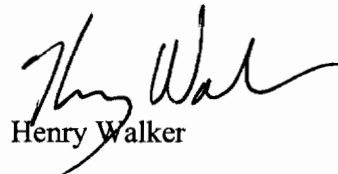
Dear Chairman Kyle:

Attached is a late-filed exhibit from the Atmos Intervention group for filing in the above-captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/djc
Enclosure

CERTIFICATE OF SERVICE

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

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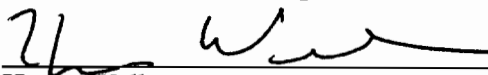
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on this the 8th day of September 2006.



Henry Walker

Atmos Intervention Group – Late Filed Exhibit on wholesale gas prices

The attached chart will illustrate that gas pricing does not necessarily trend high in the winter and low in the summer. Based on New York Mercantile Exchange (NYMEX) monthly closing prices since January 2000, we would conclude that there is a high probability that winter gas pricing may be lower than the average summer price. As the attached exhibit shows, in 6 out of the last 7 years there were months during the winter season (Dec-Mar) where the actual NYMEX close was lower than the summer average.

Therefore, there is a good possibility that natural gas storage volumes made available for transportation customers may not be used, however, these volumes would definitely mitigate natural gas pricing risks, and allow transportation customers downside opportunities to use natural gas at lower winter pricing.

Atmos Intervention Group - Late Filed Exhibit

Nymex Closes since 2000

| | 2006 | 2005 | 2004 | 2003 | 2002 | 2001 | 2000 |
|------------|----------|----------|---------|---------|---------|---------|---------|
| Jan | \$ 11.43 | \$ 6.21 | \$ 6.15 | \$ 4.99 | \$ 2.56 | \$ 9.98 | \$ 2.34 |
| Feb | \$ 8.40 | \$ 6.29 | \$ 5.78 | \$ 5.66 | \$ 2.01 | \$ 6.30 | \$ 2.62 |
| Mar | \$ 7.11 | \$ 6.30 | \$ 5.15 | \$ 9.13 | \$ 2.39 | \$ 5.00 | \$ 2.60 |
| Apr | \$ 7.23 | \$ 7.32 | \$ 5.37 | \$ 5.15 | \$ 3.47 | \$ 5.38 | \$ 2.90 |
| May | \$ 7.20 | \$ 6.75 | \$ 5.94 | \$ 5.12 | \$ 3.32 | \$ 4.89 | \$ 3.09 |
| June | \$ 5.93 | \$ 6.12 | \$ 6.68 | \$ 5.95 | \$ 3.42 | \$ 3.74 | \$ 4.41 |
| Jul | \$ 5.89 | \$ 6.98 | \$ 6.14 | \$ 5.29 | \$ 3.28 | \$ 3.18 | \$ 4.37 |
| Aug | \$ 7.04 | \$ 7.65 | \$ 6.05 | \$ 4.69 | \$ 2.98 | \$ 3.17 | \$ 3.82 |
| Sep | | \$ 10.85 | \$ 5.08 | \$ 4.93 | \$ 3.29 | \$ 2.30 | \$ 4.62 |
| Oct | | \$ 13.91 | \$ 5.72 | \$ 4.43 | \$ 3.69 | \$ 1.83 | \$ 5.31 |
| Nov | | \$ 13.83 | \$ 7.63 | \$ 4.46 | \$ 4.13 | \$ 3.20 | \$ 4.54 |
| Dec | | \$ 11.18 | \$ 7.98 | \$ 4.86 | \$ 4.14 | \$ 2.32 | \$ 6.02 |
| Summer Avg | \$ 6.28 | \$ 6.92 | \$ 6.29 | \$ 5.31 | \$ 3.22 | \$ 3.36 | \$ 4.20 |
| Winter Low | \$ 7.11 | \$ 6.21 | \$ 5.15 | \$ 4.86 | \$ 2.01 | \$ 2.32 | \$ 2.34 |

