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December 15, 2006

**VIA HAND DELIVERY**

Sarah Kyle, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37219

Re: In Re: Petition of the Consumer Advocate to open an investigation to determine whether Atmos Energy Corp. should be required by the Tennessee Regulatory Authority 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 No. 05-00258

Dear Chairman Kyle:

Enclosed you will find the original and thirteen copies of the Petition of Intervention of Stand Energy Corporation and a check for \$25.00 for the filing fee.

Please contact me if you need additional information.

Sincerely,



D. Billye Sanders  
Attorney for Stand Energy  
Corporation

cc: John M. Dosker, General Counsel, Stand Energy corporation  
Parties of Record

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

IN RE: PETITION OF THE	)	
CONSUMER ADVOCATE TO	)	
OPEN AN INVESTIGATION	)	
TO DETERMINE WHETHER	)	
ATMOS ENERGY CORP. SHOULD	)	
BE REQUIRED BY THE TENNESSEE	)	DOCKET NO. 05-00258
REGULATORY AUTHORITY	)	
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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**PETITION TO INTERVENE**

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Pursuant to T.C.A. 4-5-310(3)(b) Stand Energy Corporation ("Stand Energy") hereby petitions to intervene in the above captioned proceeding.

Stand Energy is an independent marketer of retail energy, including natural gas. Stand Energy competes with Atmos Energy Company (Atmos) and/or its affiliate, Atmos Energy Marketing, LLC in Ohio, Virginia, Kentucky and Tennessee. The policies and decisions of the Tennessee Regulatory Authority regarding the management and use of Atmos' assets by Atmos and its affiliates affect the competitive environment for an independent marketer such as Stand Energy. The resolution of the asset management issues that remain in this docket may affect Petitioner's legal rights, duties, privileges, immunities, or other legal interests and may be determined in this proceeding.

The granting of this Petition will not impair the interest of justice or the orderly and prompt conduct of these proceedings.

Wherefore, the Petitioner respectfully prays that the Authority grant its Petition to Intervene and grant such other relief as may be appropriate.

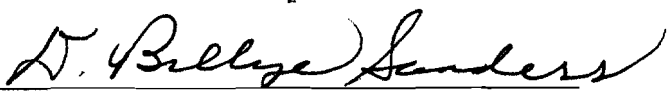
Notices and other communications regarding this Petition to Intervene should be sent to:

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and

John M. Dosker, General Counsel  
Stand Energy Corporation  
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Respectfully Submitted,  
Stand Energy Corporation

By:   
D. Billye Sanders  
Attorney for Stand Energy Corporation

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been hand-delivered, e-mailed or faxed to the following parties of interest on this 15<sup>th</sup> day of December, 2006.

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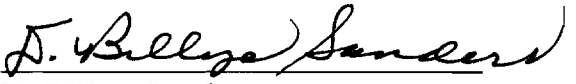
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