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June 21, 2007

**VIA HAND DELIVERY**

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

Re: In Re: Atmos Energy Corporations Annual Cost  
Adjustment (ACA) for the Twelve Months Ended June 30, 2005  
Docket No. 05-00253

Dear Chairman Kyle:

Enclosed you will find the original and thirteen copies of the Petition to Intervene of Stand Energy Corporation and a check for \$25.00 for the filing fee, as well as the original and thirteen copies of the Application of John M. Dosker to Appear Pro Hac Vice.

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**

<b>IN RE: ATMOS ENERGY )</b>	
<b>CORPORATION'S ANNUAL COST )</b>	
<b>ADJUSMENT (ACA) FOR THE )</b>	<b>DOCKET NO. 05-00253</b>
<b>TWELVE MONTHS ENDED )</b>	
<b>JUNE 30, 2005 )</b>	

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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. Stand Energy is also agent for Harrison Construction in connection with its natural gas consumption. Harrison Construction is a customer of Atmos in Tennessee. A copy of the Limited Appointment of Agent appointing Stand Energy as Harrison Construction's Agent is attached.

On December 15, 2006, Stand Energy filed a Petition for Intervention in Docket No. 05-00258 (*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*), in order to participate in Phase II of that docket pertaining to asset management issues. On March 26, 2007 the TRA heard oral

arguments from existing parties in that docket regarding whether Docket No. 05-00253 or Docket No. 05-00258 is the appropriate forum to address asset management issues and how the resolution of such issues should proceed. As of the date of preparation of this Petition to Intervene, the agency has not determined in which docket the asset management issues will be addressed, nor has it acted upon Stand Energy's Petition to Intervene in Docket No. 05-00258. 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 pertaining to Atmos and/its affiliate Atmos Energy Marketing, LLC may affect Petitioner's legal rights, duties, privileges, immunities or other legal interests and may be determined in this proceeding. In order that Stand Energy may receive notice and be fully informed regarding the issues being addressed in this docket and be in a position to assert its interests before the TRA, Stand Energy seeks to intervene in this docket.

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:

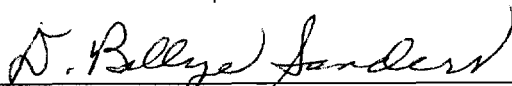
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and

John M. Dosker, General Counsel  
Stand Energy Corporation  
1077 Celestial Street  
Rookwood Building  
Suite 110  
Cincinnati, OH 45202-1629  
Phone: (513) 621-1113  
Email: [JDosker@stand-energy.com](mailto:JDosker@stand-energy.com)

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 21<sup>st</sup> day of June, 2007.

Misty Kelley  
Joe A. Connor  
Baker, Donelson, Bearman & Caldwell  
1800 Republic Centre  
633 Chestnut Street  
Chattanooga, TN 37450-1800

Pat Childers  
VP-Regulatory Affairs  
Atmos/United Cities Gas Corp.  
810 Crescent Centre Drive, Ste 600  
Franklin, TN 37064-5393

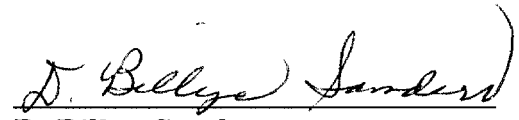
Vance L. Broemel  
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Consumer Advocate and Protection Division  
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D. Billye Sanders

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

<b>IN RE: ATMOS ENERGY )</b>	
<b>CORPORATION'S ANNUAL COST )</b>	
<b>ADJUSMENT (ACA) FOR THE )</b>	<b>DOCKET NO. 05-00253</b>
<b>TWELVE MONTHS ENDED )</b>	
<b>JUNE 30, 2005 )</b>	

**APPLICATION TO APPEAR PRO HAC VICE**

Pursuant to Rule 19 of the Rules of the Supreme Court of the State of Tennessee, John M. Dosker, General Counsel, for Stand Energy Corporation, hereby makes application for permission to appear and to participate in the above referenced case on behalf of Stand Energy Corporation and in support of his application states as follows:

1. The full name of the undersigned is John M. Dosker. The address of his residence is 2716 McKinley Avenue, Cincinnati, Ohio 45211 and his business address is Stand Energy Corporation, 1077 Celestial Street, Suite 110 Cincinnati, OH 45202-1629.

2. The undersigned hereby enters an appearance on behalf of Stand Energy Corporation in the above reference matter.

3. The undersigned is currently licensed, in good standing and admitted to practice in the Commonwealth of Kentucky (Kentucky License No. 82089). The undersigned has been licensed in Kentucky since 1987, has been licensed in the United States District Court for the Eastern District of Kentucky at Covington since 1989 and was admitted to the United States Supreme Court in 2006. No

disciplinary action or investigation of his conduct as an attorney has ever been filed, nor is any such action or investigation pending.

4. The undersigned agrees to subject himself to the jurisdiction of the Authority in any manner arising out of his conduct in such proceeding and agrees to be bound by the rules governing the conduct of attorneys appearing before this Authority.

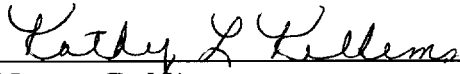
5. The undersigned will provide representation to Stand Energy Corporation in association with D. Billye Sanders, who is licensed in the state of Tennessee (Board of Professional Responsibility No. 005631). Her address is: Waller Lansden Dortch & Davis, LLP, 511 Union Street, Suite 2700, Nashville, TN, 37219.

WHEREFORE, the undersigned requests that he be admitted *pro hac vice* to appear and participate in the above-styled case of behalf of Stand Energy Corporation.

  
John M. Dosker

State of Ohio

Sworn and subscribed before me  
This 20 day of June, 2007.

  
Notary Public

My Commission Expires 2-7-2011

**KATHY L. KELLEMS**  
Notary Public, State of Ohio  
My Commission Expires  
February 7, 2011