

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

November 7, 2007

*In re: Atmos Energy Corporation, Tariff Filing to)
Modify and Add Language Regarding)
Transportation Service (Tariff No. 2007-0021))*

Docket No. 07-00020

**ATMOS INTERVENTION GROUP'S FIRST ROUND OF DISCOVERY
TO
ATMOS ENERGY CORPORATION**

The Atmos Intervention Group ("AIG"), a group of large customers who purchase natural gas from Atmos Energy Corporation, hereby serves the following discovery requests to Atmos Energy Corporation ("Atmos" or the "Company").

DEFINITIONS

1. "Atmos" means Atmos Energy Corporation, and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of Atmos Energy Corporation.
2. The terms "you" and "your" refer to Atmos.
3. "AIG" means Atmos Intervention Group, a consortium of customers of Atmos.
4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.
5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of Atmos, including, but not limited to, correspondence,

memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

7. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

8. "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

9. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these

discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

GENERAL INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any data request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. For each data request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

DISCOVERY REQUESTS

1. Provide by month, from January 1, 2006 through August 31, 2007, the total throughput volumes in dekatherms that were transported by the Company including a monthly breakdown of these throughput volumes between gas transported by the Company's affiliates and all other non-affiliate gas suppliers.

RESPONSE

2. Provide by month, from January 1, 2006 to August 31, 2007, the transportation imbalances by dekatherm that were subject to the cashout terms of the Company's tariff, including a monthly breakdown of these cashouts between the Company's affiliates, and all other non-affiliate marketers.

RESPONSE

3. Provide by month, from January 1, 2006 through August 31, 2007, the daily nominations for each day to each interstate pipeline in the Company's Tennessee service territory. Also provide the aggregate metered volume of each interstate pipeline for this same period. In addition, identify the daily imbalance of each interstate pipeline and any associated daily balancing fees allocated to the Company by interstate pipelines attributable to these daily imbalances for this same time period.

RESPONSE

4. Provide by month from January 1, 2006 through August 31, 2007, the gas storage activity for each day by interstate pipeline in the Company's Tennessee service territory.

RESPONSE

5. Provide a detailed description of the Company's natural gas nomination and confirmation procedures currently in place between the Company and its affiliate asset manager, including cashout procedures for affiliate transportation customers. Also, describe how does the Company treats intermingling of gas between supply and affiliate transportation customers, and whether supply gas can be used to make up for short term imbalances for the marketing affiliate's transportation customers.

RESPONSE

6. Provide language from the Company's tariff that exempts the Company's affiliate asset manager from cashout requirements.

RESPONSE

7. Provide the daily gas storage activity for each interstate pipeline in the Company's Tennessee service territory from January 1, 2006 through August 31, 2007.

RESPONSE

8. Provide a description of how the Storage Delivery Option (“SDO”) works on East Tennessee Pipeline and how either storage or LNG can be nominated retroactively to mitigate pipeline penalties. Also, under the Company’s current asset management agreement, describe whether the Company’s affiliate would be allowed to retroactively nominate the Company’s storage to avoid penalties.

RESPONSE

9. Provide by month, from January 1, 2006 through August 30, 2007, an itemization of the Operation Flow Order (“OFO”) penalties paid by the Company to the interstate pipeline companies in the Tennessee service territory.

RESPONSE

10. Provide by month, from January 1, 2006 through August 31, 2007, the interstate pipeline costs and/or storage demand costs that were allocated to the Company's Rate Schedule 250 (interruptible) customers. If these customers are not allocated any interstate pipeline costs and/or storage demand costs, then explain the Company's rationale as to why this treatment is not discriminatory to the Company's transportation customers.

RESPONSE

11. From September 1, 2002 through August 31, 2007, identify the dates and duration of each Operational Flow Order (“OFO”), Maximum Allowable Delivery (“MAD”) order, or any other pipeline restriction in the Company’s Tennessee Service territory. For each restriction, indicate whether or not the gas supply for Rate Schedule 250 (Interruptible) customers was curtailed or limited.

RESPONSE

12. From January 1, 2006 through August 31, 2007, provide the total gas volumes by month that were transported by Atmos Energy Corporation in their Georgia regulated markets, including a breakdown of these volumes transported between affiliate and non-affiliate suppliers.

RESPONSE

13. Describe whether the Company's affiliate will be using regulated storage assets to manage their pool of customers.

RESPONSE

14. From September 1, 2002 through August 31, 2007, provide by month the total throughput, lost and unaccounted for volumes, and the resulting percentage of lost and unaccounted for gas in the Company's Tennessee service territory.

RESPONSE

15. Provide the causes of the Company's lost and unaccounted for gas in its Tennessee service territory. In addition, provide a copy of any studies or relative information possessed by the Company that identifies the particular causes for lost and unaccounted gas in the Company's Tennessee service territory.

RESPONSE

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 

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CERTIFICATE OF SERVICE

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

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on this the 7th day of November, 2007.



Henry M. Walker