

**IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: TARIFF FILING TO MODIFY)
AND ADD LANGUAGE REGARDING) TRA Docket No. 07-00020
TRANSPORTATION SERVICE)**

**FIRST DISCOVERY REQUEST OF ATMOS ENERGY CORPORATION
TO STAND AND SOUTHSTAR**

Atmos Energy Corporation (Atmos) respectfully serves these discovery requests on Stand Energy Corporation (Stand) and Southstar Energy Services LLC (Southstar). Atmos also has submitted a separate set of discovery requests directed to all parties, and Atmos requests that Stand and Southstar answer those as well.

DISCOVERY REQUESTS TO STAND AND SOUTHSTAR

1. Have you sold gas or gas related services to any customer located within the Atmos service areas in Tennessee within the last 24 months? If so, answer the questions below in discovery request number 2. If not, explain how you would be harmed by any of the provisions of the Company's proposed tariff.

RESPONSE:

2. For each of your Tennessee customers that has purchased gas or any type of gas service (including, without limitation, transportation service) from Atmos in Tennessee in the past 24 months, provide the following information:

- (a) Provide the address of each location that has purchased gas or gas service from Atmos;
- (b) Separately for each such location, identify the type(s) of gas service (by Atmos tariff number and name) under which each location has purchased gas or gas service from Atmos in the past 24 months;
- (c) Separately for each such location, identify each other entity from which gas or gas-related marketing or other services have been purchased in the past 24 months;
- (d) Describe and explain all of the contractual, economic and other terms under which each such location has purchased gas or gas-related marketing or other services in the past 24 months;
- (e) For each such location, indicate what type of gas capacity is used to serve the customer (e.g. firm, secondary firm, interruptible), and explain how gas is delivered to such customer during OFO (operational flow order) periods;

RESPONSE:

3. Do you reasonably expect that you will sell gas or gas related services to any new customers in Tennessee within the next 12 months? If so, identify each such customer and provide the address of the customer's Tennessee locations to which you reasonably expect to sell gas or gas related services within the next 12 months.

RESPONSE:

4. Separately for each such potential customer,
- (a) Describe the type of gas service that such potential customer is reasonably expected to purchase from you;
 - (b) Describe and explain all of the contractual, economic, and other terms

under which you expect such potential customer to purchase gas or gas related services;

RESPONSE:

5. Provide your total gross revenue and net profit from your Tennessee operations for each of the last two fiscal years.

RESPONSE:

6. List the other utilities behind whose city gates you serve gas customers.

RESPONSE:

DISCOVERY REQUESTS TO STAND ONLY

7. With respect to Harrison Construction, the one potential customer identified in connection with Stand's intervention in this proceeding, answer the following questions:

- (a) Is that customer's decision whether or not to use natural gas in its operations dependent to any degree upon the commodity price of natural gas? If so, is commodity price a primary factor or a small factor?
- (b) Provide the highest total, bottom line, delivered-to-the-meter gas cost at which it would be economically advantageous for Harrison Construction to burn natural gas in its Tennessee operations rather than an alternate fuel.
- (c) If Harrison Construction were to burn natural gas in its Tennessee operations, would it require, whether directly from the pipeline or through Stand, firm transportation service on the connecting interstate pipeline or would it use interruptible transportation service?

- (d) If the answer to Question No. 5 is "firm", does Harrison Construction or its affiliates or Stand hold any firm interstate pipeline capacity that can be used to deliver the customer's natural gas to the Company's city gate? If the answer to Question No. 5 is interruptible, is interruptible transportation service available on the interconnecting interstate pipeline?
- (e) Explain how any of the provisions of the Company's proposed tariff would discourage Harrison Construction from using natural gas in connection with its operations in Tennessee.

RESPONSE:

NEAL & HARWELL, PLC

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served, via the method(s) indicated below, on the following counsel of record, this the 1 day of November 2007.

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