

**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 ALL PARTIES**

Atmos Energy Corporation (Atmos) respectfully serves these discovery requests on all other parties to this case, including all parties who have intervened in this matter. In addition to these discovery requests applicable to all parties, Atmos also has served separate discovery requests directed to certain individual parties.

1. Identify each person whom you expect to call as an expert witness at the hearing on the merits in this docket, and for each such expert witness:

- (a) Provide a current and complete CV for the witness, including a list of citations to all of the expert's publications and presentations;
- (b) Identify the subject matter on which the witness is expected to testify, and state the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;
- (c) Produce any exhibits to be used in conjunction with the expert's testimony;
- (d) Produce all transcripts of the expert's prior testimony or, if not available, identify the matters in which the expert has testified with sufficient specificity that transcripts can be obtained by counsel for Atmos;
- (e) Describe all of the expert's financial interests in the litigation, including, without limitation, financial terms under which the expert is to be compensated for his work in connection with this case;
- (f) Produce all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, file notes, chart notes, tests, test

results, interview notes, and consultation notes provided to, reviewed by, utilized by, relied upon, created by, or produced by the expert in evaluating, reaching conclusions or formulating an opinion in this matter. Produce electronic versions of the files (e.g. Excel and Power Point) where such versions exist.

RESPONSE:

2. Identify the name and location of all persons having knowledge of discoverable matters in this case.

RESPONSE:

3. Produce all documents that you plan to introduce, use, or reference at the hearing on the merits in this docket.

RESPONSE:

4. If you oppose any of the tariff amendments requested in this matter identify each tariff amendment that you oppose and explain the grounds for your opposition.

RESPONSE:

5. If you contend that any of the tariff amendments requested in this matter would cause an adverse financial impact on you or any of your members or customers, explain your

contention and quantify the adverse financial impact to the extent that you are able to do so.

RESPONSE:

6. Produce all documents that evidence communications from Atmos customers that addresses any of the terms or provisions of the tariff at issue in this proceeding or any of the requested amendments thereto.

RESPONSE:

7. Do you agree that a transportation customer and/or its agent should accurately nominate quantities of natural gas for delivery to the Company's city gate?

RESPONSE:

8. If your answer to the preceding question is anything other than an unqualified "yes," explain what you believe to be the a transportation customer's (or his agent's) obligation, if any, with respect to managing nominations.

RESPONSE:

9. If a transportation customer's daily volume usage is available electronically through the Atmos website and the customer is permitted by Atmos to make intra-month changes

to its nominations, do you agree that a transportation customer then has the ability to manage its nominations more frequently than once a month?

RESPONSE:

10. If your answer to the preceding question is anything other than an unqualified "yes," explain in the basis for your position.

RESPONSE:

11. Do you contend that a tolerance of 10%, before the Company can assess daily scheduling fees, is unreasonable? If so, explain the basis for your contention.

RESPONSE:

12. Are you aware of any interstate pipelines that are permitted to charge daily scheduling fees or penalties to a shipper with respect to differences (outside of a prescribed tolerance) between the shipper's scheduled deliveries at a delivery point and the quantities actually taken by the shipper at the delivery point? If so, please identify the pipeline(s), and describe the terms under which they charge daily scheduling fees or penalties.

RESPONSE:

13. If storage is used by the Company to maintain daily balances on an interstate pipeline in order to avoid pipeline imbalance charges, then explain why transportation customers who cause or contribute to cause pipeline imbalances should not be required to contribute to the costs of storage through daily scheduling fees.

RESPONSE:

14. If the Company agreed to modify the language in the proposed tariff to make imposition of daily scheduling fees mandatory, would you oppose this modified provision of the tariff? If so, explain the basis for your opposition.

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 7 day of November 2007.

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