

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

**IN RE:**

<b>ATMOS ENERGY CORPORATION</b>	)	
<b>TARIFF FILING TO MODIFY AND</b>	)	
<b>ADD LANGUAGE REGARDING</b>	)	
<b>TRANSPORTATION SERVICE</b>	)	
<b>(TARIFF NO. 2007-0021)</b>	)	<b>DOCKET NO. 07-00020</b>

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**STAND ENERGY CORPORATION'S FIRST SET OF DISCOVERY TO ATMOS**

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Stand Energy Corporation ("SEC") hereby serves the following discovery consisting of Interrogatories and Requests for Production of Documents, pursuant to T.C.A. § 4-5-311, Rules 26, 33, and 34 of the Tennessee Rules of Civil Procedure and TRA Rule 1220-1-2.11 for response and production of documents from Atmos Energy Corporation ("Atmos") by November 27, 2007 pursuant to the procedural schedule established by the Tennessee Regulatory Authority ("TRA") in its Order dated, October 2, 2007.

**DEFINITIONS**

As used herein the following definitions apply, whether the defined term is capitalized or lower case:

1. "Affiliate" means, in relation to any Person, any entity controlled, directly or indirectly, by such Person, any entity that controls, directly or indirectly, such Person, or any entity directly or indirectly under common control with such Person. For this purpose, "control" of any entity or Person includes, but is not limited to, ownership of a majority of the voting power of the entity or Person or by contractual means or otherwise.

2. "Any" means each, every, and all Persons, Documents, Documentation, and Correspondence, places or things to which the term refers to or Concerns.
3. "Communication(s)" means, but is not limited to, all forms of interaction or communication whether written, printed, oral, pictorial, electronic or by any other medium.
4. "Authority" or "TRA" refers to the Tennessee Regulatory Authority.
5. "Consumer(s)" means all customers, end-users, and consumers, without limit, that receive at least natural gas distribution services from Atmos.
6. "Concerning" is used in its broadest sense when used with reference to a stated subject; "concerning" shall mean and include both of the following: (i) containing, comprising, constituting, stating, setting forth, recording, relating to, recording, including, negating or manifesting in any way, whether in whole or in part, that subject; and (ii) alluding to, describing, discussing, reflecting, interpreting, identifying, regarding, contradicting, referring to, or in any way pertaining to, whether in whole or in part, that subject.
7. "Correspondence(s)" means, without limiting its general meaning, all letters, telegrams, faxes, emails, notices, messages, memoranda and other written or electronic Communications.
8. "Document(s)" or "Documentation(s)" when used herein, means all originals of any nature whatsoever, identical copies, and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody, or control regardless of where located; including without limiting the generality of the following: punchcards, printout sheets, movie film, slides, phonograph records, photographs, microfilm, video media, notes, memoranda, ledgers, work sheets, books, magazines, notebooks, diaries, calendars, appointment books, registers, charts, tables, papers, agreements, contracts, purchase

orders, checks and drafts, acknowledgments, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meetings of any kind, correspondence, telegrams, drafts, discs or tapes, and computer produced interpretations thereof, instructions, announcements, schedules, price lists, electronic copies, and mechanical or electric sound recordings and transcripts thereof. In all cases, "Document(s)" or "Documentation(s)" shall also mean all written, printed, reproduced, recorded, typed, graphic, photographic, or electronic matter in your possession, custody, or control, including without limitation books, manuals, pamphlets, periodicals, correspondence, letters, memoranda, faxes, telegrams, electronic mail ("email") messages and attachments, reports, records, studies, transcripts, workpapers, working papers, notes, charts, graphs, indices, data sheets, and all drafts thereof, and every copy of a document which contains handwritten or other notations not otherwise duplicated in the original or any other copy. In all cases, where originals and/or non-identical copies are not available, "Document(s)" or "Documentation(s)" shall also mean identical copies of original documents and copies of non-identical copies.

9. "Distribution Facilities" refers to equipment owned, operated, and/or controlled by Atmos that is directly or indirectly related to or associated with its provision of natural gas distribution delivery and related services to Consumer(s), from the location of the equipment controlled by the Consumer and up to and including all the facilities, plant, and equipment that serve the Consumer.
10. "Identification" or "Identify" or "Identity" or "Identified" when used herein shall mean that you are required to provide the requested information as the context requires it, and also, when used in reference to: (a) a natural individual, require you to state his or her full name, business address, business title(s), and the entity(s) that the Person works for and/or worked for at the

time of the transaction or activity inquired into and at the time of the inquiry; (b) a corporation, require you to state its full corporate name and any names under which it does business, its state of incorporation, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the type of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and control the business; (d) a Document or Documentation, require you to state the number of pages and the nature of the document (for example and without limitation, letter or memorandum, its title, its date, the name or names of its authors and recipients, and its present location and custodian, and whether or not it is claimed that such document is privileged and, if so, the type of privilege claimed and a statement of all the circumstances which will be relied on to support such claim of privilege; (e) Correspondence(s), to identify the Document(s) and/or Documentation(s) which refer to or evidence the Correspondence; (f) Communication, if written, to identify the Document(s) or Documentation(s) which refer to or evidence the Communication, and to the extent engaged in orally or otherwise, to provide the date, manner, place, and substance of the Communication.

11. "Load" means the consumption of Consumers that received and/or are currently receiving local distribution service (whether standard-offer or otherwise) from Atmos.
12. "Person(s)" includes any natural person, corporate entity, firm, partnership, limited liability company, association, joint venture, cooperative, municipality, city, county, irrigation district, drainage district or other special district or political subdivision, or federal, state or local governmental body, department, or agency, entity or group of persons, unless the context clearly indicates that only an individual person is referred to.

13. "Pool" means a group of Consumers that take or receive service from a single provider that have been joined together, for Any particular purpose, with other Consumers taking or receiving from that same provider.
14. "Studies" means without limitation reports, analyses, studies, investigations, reviews, summaries, audits, forecasts, opinions, opinion Documents, justification Documents, and all prior versions of such Documents.
15. "Supplier" means without limitation, a marketer, supplier, alternate commodity supplier, capacity, supply, and/or commodity management provider, Pool operator, aggregator, or governmental aggregator.
16. "You" or "Your" or "Yourself" refers to the party to which or whom these discovery requests are directed, including all Affiliates, joint partnerships, corporate parents, subsidiaries, departments, divisions, officers, agents, consultants, employees, contractors, predecessors, successors and assigns, whether present or former.

### **INSTRUCTIONS FOR ANSWERING**

1. Each response, document or objection should commence on a separate page and should be immediately preceded by the corresponding request or sub-request to which it responds.
2. Each response must be supplemented by timely amendments if subsequent information renders any response incorrect in any material respect.
3. For each response, please identify the individual who prepared the response or the person(s) under whose supervision the response was prepared.

4. For each response, please provide an oath or certification that the response is true and accurate to the best of the preparer's knowledge, information and belief after reasonable inquiry.
5. Each request shall be deemed continuing in nature and must be updated immediately upon receipt of any new, further or different information that is responsive to the request.
6. With respect to any request consisting of separate parts or subparts, a complete response to each subpart is required as if the subpart were set forth as a separate request.
7. If any request cannot be answered in full after reasonable inquiry, please provide the response to the extent available, state why the request cannot be answered in full, and provide any information within your knowledge concerning the description, existence, availability, and custody of any unanswered portions.
8. In responding to these requests, please provide information from all files in the possession of, owned by, controlled by, or accessible to you, as well as all files maintained or controlled by officers, employees, agents or consultants or other representatives of your organization.
9. If no information or document is responsive to any request, please so state in the response.
10. If any document requested is not in your possession but you know or believe it to exist, please so state and identify to the best of your ability the last known location of the document and its custodian.
11. If any document requested or related to any request has been destroyed or discarded, please state the date the document was destroyed, the person or entity responsible for its destruction, the reason for its destruction, and provide a description of the contents and length of the document.

12. If any information or Documentation is not available in the exact form requested, please provide any available information or documents that best respond to the request.
13. For any information or Documents maintained by computer or data storage mechanism, please state the name of the file from which the information came, how the data is stored (CD, diskette, tape, etc.), the computer or media program in which it is stored, the name of the Person who collected or entered the information, and how the Document or information can be transmitted and retrieved.
14. The singular form of a word shall be interpreted as plural, and the plural form as singular, to the extent appropriate in order to respond to the scope of these requests and to make the request inclusive rather than exclusive.
15. “And” and “or” shall be construed either disjunctively or conjunctively as appropriate to respond to the scope of these requests.
16. Any objection to a request should provide a list of all information or documents withheld, describe the character and specific subject matter of the information withheld, including a description of the number of documents withheld and a summary of the information contained in such documents, and should clearly state the specific objection asserted and the grounds on which the objection is based.

## **INTERROGATORIES**

### **Stand - ATMOS 1-1:**

For the previous twelve months ending July 30, 2007, please respond to the following with respect to Tennessee:

- A. Identify the total number of residential Consumers served by Atmos.
- B. Identify the total annual load of the residential Consumers served by Atmos in MCf.
- C. Identify the total number of small commercial Consumers served by Atmos.
- D. Identify the total number of small commercial meters served by Atmos.
- E. Identify the total annual load of the small commercial Consumers served by Atmos in MCf.
- F. Identify the total number of commercial Consumers served by Atmos.
- G. Identify the total number of commercial meters served by Atmos
- H. Identify the total annual load of the commercial Consumers served by Atmos in MCf.
- I. Identify the total number of industrial Consumers served by Atmos.
- J. Identify the total number of industrial meters served by Atmos.
- K. Identify the total annual load of the industrial Consumers served by Atmos in MCf.
- L. Identify the total number of sales Consumers served by Atmos.
- M. Identify the total annual load of all Atmos' sales Consumers in MCf.
- N. Identify the total number of transportation Consumers served by Atmos.
- O. Identify the total annual load of all Atmos' transportation Consumers in MCf.

### **RESPONSE:**



Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-2:

Please Identify Any Studies that Atmos prepared, is preparing, and/or have or are having prepared concerning the following:

- A. Concerning the proposed changes to Schedule 260.
- B. Concerning any impacts/outcomes of implementing the changes proposed to Schedule 260.
- C. Concerning any penalties to Suppliers and Pool operators that might result due to the changes in Schedule 260.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-3:

With regard to Atmos' Schedule 260 proposals, please respond to the following:

- A. Identify all Documents, Studies, and Correspondence produced, created, or compiled concerning the proposed daily balancing service in Schedule 260.
- B. Identify all Documents, Studies, and Correspondence produced, created, compiled, or otherwise utilized by Atmos in determining that the daily balancing proposed in Schedule 260 is necessary.
- C. Identify any operational events that occurred during the last 24 months with regard to Atmos system operations that caused Atmos to determine that the daily balancing proposed in Schedule 260 is necessary.
- D. Identify Any Documents and Correspondence associated with (C) above.
- E. Identify all Documents, Studies, and Correspondence produced, created, compiled, or otherwise utilized by Atmos in determining the necessity for the daily pipeline delivery point nomination and delivery requirements proposed in Schedule 260.
- F. Identify any operational events that occurred over the last 24 months with regard to Atmos' operations that caused Atmos to determine that the daily pipeline delivery point nomination and delivery requirements proposed in Schedule 260/ are necessary.
- G. Identify all Documents, Studies, and Correspondence produced, created, compiled, or otherwise utilized by Atmos in determining the necessity for the penalties associated with each of the proposals in Schedule 260.
- H. Identify all Documents, Studies, and Correspondence produced, created, compiled, or otherwise utilized by Atmos in determining the nature/type of each of the penalties associated with each of the proposals in Schedule 260.

- I. Identify all Documents, Studies, and Correspondence produced, created, compiled, or otherwise utilized by Atmos in determining the amount of the penalties associated with each of the proposals in Schedule 260.
- J. Identify all Documents, Studies, and Correspondence produced, created, compiled, or otherwise utilized by Atmos in determining the amount the penalties dollars that might be generated associated with any of the proposals in Schedule 260.
- K. Identify and briefly explain how and to whom Atmos intends to or has proposed to allocate the generated penalty dollars Identified in (J) above.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-4:

Please respond to the following:

- A. Why does Atmos think a daily scheduling fee in Schedule 260 is necessary or appropriate?
- B. How did Atmos arrive at the formula for the daily scheduling fee?
- C. Show the calculation and the amount of the Daily Scheduling Fee using specific examples.

Please show several examples for commercial and industrial customers.

- D. Who will retain the daily scheduling fees under Atmos' proposal?

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-5:

Please respond to the following:

- A. Identify and briefly explain why the daily scheduling fee is being proposed.
- B. Identify any studies associated with Atmos' determination of the amount of and need for the daily scheduling fee.
- C. Identify and briefly explain the methodology that Atmos utilized to determine the formula for the daily scheduling fee, including the determinants.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-6:

With regard to Atmos' operations pursuant to Atmos' currently approved Authority tariffs, please respond to the following:

- A. Identify each interstate transmission pipeline with which Atmos distribution facilities have any point of delivery or interconnection.
- B. For the points of deliveries and/or interconnections Identified in (A) above, Identify the maximum daily rated capacity.
- C. For the past 24 months, on a monthly basis, identify the total amount of deliveries that Atmos received through the points of deliveries and/or interconnections Identified in (A) above.
- D. For the past 24 months, on a monthly basis, identify the total amount of Atmos system supply deliveries that were received through the points of deliveries and/or interconnections Identified in (A) above.
- E. For the total deliveries Identified in (D) above, Identify, for the past 24 months, on a monthly basis, the pro rata or percentage amount of the deliveries for each interstate pipeline from which the deliveries were received.
- F. Identify the total amount of Atmos' non-system supply deliveries (deliveries by Suppliers and Pool operators) that Atmos received through the points of deliveries and/or interconnections Identified in (A) above.
- G. For the total deliveries Identified in (F) above, Identify, for the past 24 months, on a monthly basis, the pro rata or percentage amount of the deliveries for each interstate

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:



Stand - ATMOS 1-7:

With regard to Atmos' operations pursuant to currently approved Authority tariffs, please respond to the following:

- A. Identify any supplier that has made a delivery to Atmos during the past 24 months.
- B. For the period covering the last 24 months, (i) Identify any deliveries made to Atmos by any supplier Identified in (A) above, and (ii) for the deliveries identified in (i), identify the exact pipeline point of receipt and quantity associated with that delivery.
- C. For the past 24 months, for any supplier identified in (A) above, identify the monthly historic imbalance caused by or related to the supply obligations of each such supplier.
- D. For the past 24 months, for any supplier identified in (A) above, Identify the penalty revenues associated with the monthly historic imbalances caused by or related to the supply obligations of each such supplier.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-8:

With regard to Atmos' operations pursuant to currently approved TRA tariffs, please respond to the following:

- A. Identify when Atmos' finalizes or by when Atmos generally finalizes winter operating plans for each upcoming winter heating season.
- B. Identify the approximate date when Atmos finalized winter operating plans for the 2005-2006 winter heating season.
- C. Identify the approximate date when Atmos finalized winter operating plans for the 2006-2007 winter heating season.
- D. For the period covering the past 48 months, identify any person(s) that were responsible for or involved in Atmos' decisions to give notice of and/or impose operational flow orders and/or operational matching orders.
- E. For the period covering the past 48 months, identify the dates and duration of all operational flow orders imposed by Atmos.
- F. For all operational flow orders identified in (E) above, list the reason the flow order was imposed.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-9:

With regard to Atmos operations pursuant to currently approved Authority tariffs, please respond to the following:

- A. For the period covering the past 48 months, identify any supplier that provided commodity supply service to consumers taking local distribution service from Atmos.
- B. Identify any suppliers that have participated in Atmos transportation programs over the past 48 months.
- C. For the past 48 months, has Atmos waived any requirement set forth in TRA-approved tariffs for any Supplier? If so, identify any such waiver and the Supplier that received the waiver.
- D. For the past 48 months, has Atmos waived any requirement set forth in TRA-approved tariffs for any Affiliate? If yes, identify any such waiver and the Affiliate that received the waiver.
- E. For the past 48 months, has Atmos waived any requirement set forth in TRA-approved tariffs for any consumer? If so, identify any such waiver and the consumer that received the waiver.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-10:

With respect to the total Tennessee Load served by Atmos, please respond to the following:

- A. Of the total identified load served by Atmos, (i) Identify the quantity/extent of this load that is served by commodity that Atmos obtains from any affiliate, (ii) Identify each affiliate from whom Atmos' obtains the commodity identified in (i) above; and, (ii) for the period covering the past 48 months, identify the quantity/extent of the commodity that Atmos obtained from the Affiliate(s) identified in (ii) above.
- B. Identify the total Tennessee revenue to each affiliate identified in (A)(ii) above, as a result of the transaction between Atmos and Atmos' Affiliate described in (A)(i) and (A)(iii) above.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-11:

With regard to Atmos' relationship with Atmos Energy Marketing please respond to the following:

- A. Identify any agreement and contract document between Atmos and Atmos Energy Marketing.
- B. Identify any written agreement and contract documents that superseded or were successors to the agreement Identified in (A) above.
- C. For the years 2004, 2005, and 2006, (i) Identify the total revenues generated by Atmos Energy Marketing under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-12:

Relative to Atmos' pipeline delivery requirements that persons operating the Atmos system are generally directed to operate pursuant to or under, please respond to the following:

- A. During the past 5 years, with regard to the pipeline delivery requirements, has Atmos waived or otherwise altered specific compliance with the requirements for any supplier? If so, identify any such waiver and/or alteration, and the supplier.
- B. During the past 5 years, and with regard to the pipeline delivery requirements, has Atmos waived or otherwise altered specific compliance with the requirements for any consumer? If so, identify any such waiver and/or alteration, and the consumer.
- C. During the past 5 years, and with regard to the pipeline delivery requirements, has Atmos waived or otherwise altered specific compliance with the requirements for Atmos Energy Marketing or any other Affiliate? If so, identify any such waiver and/or alteration, and the Affiliate.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-13

With regard to Your expert witness(s) for the above-captioned case(s), please:

- A. Identify Any Person whom Atmos' expects to call as an expert witness during the hearing in this matter, including the professions and/or trades of such Person and the subject matters concerning which such Person is an expert.
- B. Identify the subject matter upon which each such Person is expected to testify.
- C. Identify the qualifications of any such person or, alternatively, attach a copy of a curriculum vita of each such person. The identification of qualifications must include the educational accomplishments and endeavors of such person, including, but not limited to: (a) the degrees earned or partially completed, including the date on which said degree was conferred or is expected to be conferred, and the college or university conferring such degree; (b) all awards nominated for or received; (c) all colleges, universities or institutions attended or associated with as either student or teacher; (d) dates of such attendance or associations; (e) all courses previously or currently taught; (f) all programs, projects or institutes with which he/she has been associated or which he/she has headed; (g) present college or university affiliations; and (h) work history, including the name of the employer or organization with which associated, address of employer or organization, dates of employment or association, and general description of work performed.
- D. For any such person, identify the lawsuits, hearings or other proceedings in which such person has testified, including: (a) the date of the testimony; (b) the court, tribunal or agency and location; (c) the subject of the testimony; (d) the party on whose behalf each expert testified, whether the party was a plaintiff/petitioner or defendant/respondent; (e) the title or caption or name of caption.

- E. Provide a summary of the testimony expected from each such person, including, without limitation, the following: Any facts upon which such person is expected to testify and/or rely on; the opinions to be rendered by such person; and, a statement of the basis upon which the facts and opinion are formed.
- F. Identify any studies prepared or otherwise rendered by each such person.
- G. Identify the title, subject matter, publisher, and date of publication of all books, articles, book reviews, papers or theses each such person has authored, coauthored, contributed to, edited, or with which such person has been associated.
- H. Identify any documents examined, prepared, or otherwise used by such person to prepare for the hearing in this action(s), including, without limitation, any studies or other materials used by such person to form or develop opinions, reports, memoranda and evaluations, or from which any information was acquired for use in, or for support of, those opinions, reports, memoranda or evaluations.
- I. Identify any documents, items, and/or other exhibits, without limitation, that such person will use or rely on in any manner as a witness at hearing.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:



Stand - ATMOS 1-15:

With regard to Atmos' non-expert witness(s) for the above-captioned case(s), please:

- A. Identify each and every person whom Atmos will or expects to call as a lay, fact, or non-expert witness during the hearing in this matter.
- B. Identify the subject matter upon which each such person is expected to testify.
- C. Identify the qualifications of any such person or, alternatively, attach a copy of a curriculum vita of each such person. The Identification of qualifications must include the educational accomplishments and endeavors of such person, including, but not limited to: (a) the degrees earned or partially completed, including the date on which said degree was conferred or is expected to be conferred, and the college or university conferring such degree; (b) all awards nominated for or received; (c) all colleges, universities or institutions attended or associated with as either student or teacher; (d) dates of such attendance or associations; (e) all courses previously or currently taught; (f) all programs, projects or institutes with which he/she has been associated or which he/she has headed; (g) present college or university affiliations; and (h) work history, including the name of the employer or organization with which associated, address of employer or organization, dates of employment or association, and general description of work performed.
- D. For any such person, identify the lawsuits, hearings or other proceedings in which such person has testified, including: (a) the date of the testimony; (b) the court, tribunal or agency and location; (c) the subject of the testimony; (d) the party on whose behalf each expert testified, whether the party was a plaintiff/petitioner or defendant/respondent; (e) the title or caption or name of caption.

- E. Provide a summary of the testimony expected from each such person, including, without limitation, the following: any facts upon which such person is expected to testify and/or rely on; the opinions to be rendered by such person; and, a statement of the bases upon which the facts and opinion are formed.
- F. Identify any studies prepared or otherwise rendered by each such person.
- G. Identify the title, subject matter, publisher, and date of publication of all books, articles, book reviews, papers or theses each such Person has authored, coauthored, contributed to, edited, or with which such Person has been associated.
- H. Identify any documents examined, prepared, or otherwise used by such person to prepare for the hearing in this action(s), including, without limitation, any studies or other materials used by such person to form or develop opinions, reports, memoranda and evaluations, or from which any information was acquired for use in, or for support of, those opinions, reports, memoranda or evaluations.
- I. Identify any documents, items, and/or other exhibits, without limitation, that such person will use or rely on in any manner as a witness at hearing.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-16:

Please respond to the following:

- A. Identify any item that Atmos intends to or desires to use, refer to, rely on, sponsor, and/or introduce as evidence in the hearing in this matter(s).
- B. Please identify any person that Atmos has or intends to consult with, has been advised by, or from whom Atmos has received information regarding the issues in the above-captioned proceeding(s), including the professions and/or trades of such person, and the subject matters concerning which such person claims to be an expert, if any.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-17:

Please respond to the following:

- A. Please identify any person that Atmos, or any Affiliate including Atmos Energy Marketing, has hired from a Public Utility Commission, Public Service Commission, State Regulatory Authority or other similar state entity over the past five years.
- B. Please identify all regulatory matters, by case number, that You, or any of Your Affiliates had pending before the regulatory agency or body at the time of the hiring of any such person identified in (A) above from the regulatory agency or body.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-18:

Please respond to the following:

- A. Excluding periods of operational flow orders (“OFOs”), please identify the financial harm to Atmos' firm sales customers that has occurred over the past 12 months because of daily imbalances of transportation customers?

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-19:

Please respond to the following:

- A. During the past 12 months, please identify each day when transportation customers provided a financial credit or system benefit to firm sales customers?

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-20:

Please respond to the following:

- A. Is Atmos Energy Marketing assigned all the pipeline and storage assets of Atmos Energy Corporation?
- B. If so, can Atmos Energy Marketing use the storage as a no-notice service for sales to Atmos Energy Marketing's transportation customers?

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-21:

What assets (firm transportation and storage) of the Atmos Energy Company does Atmos Energy

Marketing use to serve gas transportation customers?

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:



Stand - ATMOS 1-22:

Are the transportation customers served by Atmos Energy Marketing charged the full costs of the capacity that is used to serve them? If the answer is no, who pays for the difference?

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand - ATMOS 1-23:

On Atmos Energy Corporation's peak day, what capacity does Atmos Energy Marketing use to serve its transportation customers?

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

**Stand 1-1:**

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-1.

**RESPONSE:**

**Identify the Person(s) Responsible for providing the response:**

Stand 1-2:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-2.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-3:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-3.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-4:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-4.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-5:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-5.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-6:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-6.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:



Stand 1-7:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-7.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-8:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-8.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-9:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-9.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-10:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-10.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-11:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-11.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-12:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-12.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-13:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-13.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-14:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-14.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:



Stand 1-15:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-15.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-16:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-16.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-17:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-17.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-18:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-18.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-19:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-19.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-20:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-20.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-21:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-21.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Stand 1-22:

Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-22.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:



Stand 1-23:

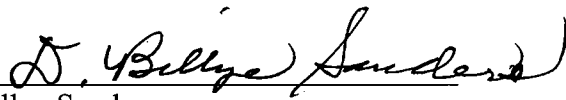
Please provide copies of or make available for inspection and copying all Documents, Documentation, and Correspondence that are the subject of Stand 1-23.

**RESPONSE:**

Identify the Person(s) Responsible for providing the response:

Respectfully submitted,

Stand Energy Corporation

By:   
D. Billye Sanders  
Waller Lansden Dortch & Davis, LLP  
511 Union Street, Suite 2700  
Nashville, Tennessee  
(615) 850-8951

**Attorney for Stand Energy Corporation**

## CERTIFICATE OF SERVICE

I hereby certify that a copy of Stand Energy Corporation's First Set of Discovery to Atmos Energy Corporation was served upon the following parties of record or as a courtesy, via U.S. Mail postage prepaid, express mail, hand delivery, or electronic transmission, on November 7, 2007.

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