

IN THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

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

**ATMOS INTERVENTION GROUP'S RESPONSES TO THE CONSUMER
ADVOCATE'S FIRST ROUND OF DISCOVERY**

The Atmos Intervention Group ("AIG") hereby submits the following responses to the First Set of Discovery Requests from the Consumer Advocate and Protection Division of the Office of the Attorney General ("CAD") propounded upon AIG.

1. Please 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) Identify the field in which the witness is to be offered as an expert'

(b) Provide complete background information, including the witness's current employer, as well as his or her educational, professional and employment history; and qualification within the file in which the witness is expected to testify;

(c) Identify all publications written or presentations presented in whole or in part by the witness, including either a copy of all such publications and presentations or a reference to where such publications and presentations may be publicly obtain;

(d) Provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;

(e) Identify any matter in which the expert has testified (though deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;

(f) Identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;

(g) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the experts; and

(h) Please produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, file notes, chart notes, test, test results, interview notes, and consultations noted provided to, reviewed by, utilized by, relied upon, created by, or produced by any proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter.

RESPONSE:

At this time, AIG does not know whether it will call an expert witness.

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

RESPONSE:

Earl Burton
Tennessee Energy Consultants
408 McCallie Avenue
Chattanooga, TN 37402

3. Please produce copies of all documents referred to or relied upon in responding to these discovery requests.

RESPONSE:

None at this time.

4. Please produce copies of all hearing exhibits that you plan to introduce, use or reference at the hearing on the merits in this docket.

RESPONSE:

None at this time.

5. Please produce copies of all documents – including without limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information – that you contend support the factual assertions, conclusions, or opinions of any of your witnesses in this matter.

RESPONSE:

See above.

6. Produce copies of all documents – including without limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information – relied upon by any of your witnesses in evaluating, reaching conclusions, or formulating an opinion in this matter.

RESPONSE:

See above.

7. Please produce copies of all documents – including limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits – created by or for or prepared by or for any of your witnesses in evaluating, reaching conclusions, or formulating an opinion in this matter.

RESPONSE:

See above.

8. Please identify all information, documentation and things filed in the docket record, including all responses to discovery of the parties and data requests from the TRA Staff, produced in this docket that you do not agree to the authenticity of such information, documents and things in this proceeding. For each separate piece of information, document and thing produced in this docket and that you contend is not admissible as evidence, describe in specific detail any objection(s) you claim as to admissibility into the evidentiary record in this docket.

RESPONSE:

See above.

9. Please provide all Excel (or other data files) containing the information provided in response to these requested items.

RESPONSE:

See above.

10. Please state the issues that you contend to be included in this docket.

RESPONSE:

See the responses of AIG to the discovery questions from Atmos Energy Corp., especially the response to Question 4.

11. Please explain what you contend to be the appropriate resolution to each issue in this docket.

RESPONSE:

See above.

12. Please describe what you contend to be the appropriate remedies in this docket.

RESPONSE:

See above.

CERTIFICATE OF SERVICE

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

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Stephen Butler, Esq.
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Consumer Advocate and Protection Division
P. O. Box 20207
Nashville, TN 37202

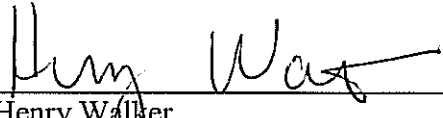
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on this the 27th day of November 2007.



Henry Walker