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November 30, 2007

VIA HAND DELIVERY

Eddie Roberson, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37219

filed electronically in docket office on 11/30/07

Re: Tariff Filing to Modify and Add Language Regarding Transportation
Service
Docket No. 07-0020
Stand Energy Corporation's Motion to Join Atmos Energy Marketing
as a Party and Motion to Compel

Dear Chairman Roberson:

Enclosed you will find the original and 4 copies of the above referenced
Motions to be filed in this docket. A copy has been filed electronically.

Sincerely,



D. Billye Sanders
Attorney for Stand Energy
Corporation

cc: John M. Dosker
Parties of Record

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

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

**STAND ENERGY CORPORATION'S MOTION TO JOIN
ATMOS ENERGY MARKETING AS A PARTY AND MOTION TO COMPEL**

Comes now Stand Energy Corporation ("Stand Energy") and files this its Motion to Join Atmos Energy Marketing as a Party and Motion to Compel in the above-captioned matter. In support of Stand Energy's motions, Stand Energy respectfully states as follows:

I. Atmos Energy Marketing should be joined as a party.

Stand Energy is an independent marketer of retail energy, including natural gas. Stand Energy competes with Atmos Energy Company ("AEC") and/or its affiliate, Atmos Energy Marketing, LLC ("AEM") in Ohio, Virginia, Kentucky and Tennessee. In this proceeding, Stand Energy contends that the policies and decisions of the Tennessee Regulatory Authority (the "TRA") regarding the management and use of AEC's assets by AEC and its affiliates, such as AEM, affect the competitive environment for independent marketers like Stand Energy.

On or about October 2, 2007, the TRA entered an Order Establishing Procedural Schedule, Granting Interventions, and Suspending Tariffs. The aforementioned Order established the following deadlines:

Status Conference	September 25, 2007
Protective Order Due	October 11, 2007
Atmos' Pre-filed Testimony	October 25, 2007
Discovery Requests Filed	November 7, 2007
Responses to Discovery Due	November 27, 2007

Motions to Compel Discovery	November 30, 2007
Response to Motions to Compel	December 5, 2007
Hearing Officer's Order	December 7, 2007
Discovery Responses	December 11, 2007
Intervenors' Pre-filed Testimony Due	December 17, 2007
Atmos' and CAPD's Pre-filed Rebuttal Testimony	January 7, 2008
Pre-hearing Conference	January 11, 2008
Hearing on the Merits	January 15-16, 2008
Post Hearing Briefs	January 29, 2008

In an effort to comply with the above-referenced schedule and obtain discovery pertinent to its claims, Stand Energy propounded discovery to AEC on November 7, 2007. AEC served Stand Energy with its responses on November 27, 2007. Stand Energy's discovery requests included interrogatories designed to ascertain information regarding AEM's use of AEC's assets. However, AEC did not provide answers to the interrogatories and instead responded as follows:

Interrogatory 1-21:

What assets (firm transportation and storage) of the Atmos Energy Company does Atmos Energy Marketing use to serve gas transportation customers?

RESPONSE:

Subject to and without waiving its General Objections, AEC responds as follows: AEC presumes that Stand means whether Atmos Energy Marketing uses any of the utility's firm transportation or storage capacity on a connecting interstate pipeline to ensure commodity deliveries to AEC's city gates on account of AEM's customers behind those city gates. In response, AEC would respond that it does not know nor is it privy to what transportation or storage capacity is actually used by AEM (whether AEM's directly held capacity or released capacity) in connection with such activities and **that specific information would need to be obtained from AEM.**

Interrogatory 1-23:

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

RESPONSE:

Subject to and without waiving its General Objections, AEC responds as follows: See Response to Request 1-21.

See AEC's Responses and Objections to Stand Energy's Discovery Requests attached hereto as Ex. 1 ("emphasis added").

Based on AEC's inability to answer Interrogatories 1-21 and 1-23 regarding the capacity of AEC assets used by AEM and AEC's position that Stand Energy obtain this information directly from AEM, AEM should be joined as a party in this proceeding pursuant to Rule 19.01 of the Tennessee Rules of Civil Procedure. At the heart of the dispute between Stand Energy and AEC is whether AEC is allowing its affiliated companies, such as AEM, to obtain a competitive advantage over Stand Energy and others in the market. AEM's website states that it was acquired by AEC in April of 2001 and "is part of the non-utility division of Atmos Energy Corporation." See AEM website materials attached hereto as Ex. 2. Accordingly, contrary to what AEC's discovery responses would have Stand Energy believe, AEC does not know and is refusing to answer Stand Energy's Interrogatories 1-21 and 1-23 because it simply does not want to know. In light of AEC's decision to shield itself by refusing to telephone its "non-utility division" and obtain the requested information, Stand Energy respectfully submits that it should not be penalized and requests that AEM be joined as a party in this matter. In light of the expedited Scheduling Order, Stand Energy further requests that all existing deadlines, including the hearing date, be extended for 30 days or for such time necessary for the TRA to rule on this motion and allow Stand Energy an opportunity to obtain the requested information from AEM.

II. Atmos Energy Corporation should be required to provide full and complete answers to Stand Energy's discovery requests.

a. Interrogatories 1-6(e) and 1-6(g):

In response to Interrogatories 1-6(e) and 1-6(g), AEC states that "it is vague and indefinite . . . AEC does not understand what this request is seeking." Interrogatories 1-6(e) and 1-6(g) are neither vague nor indefinite. To the extent that AEC does not understand, Stand

Energy has requested the percentage of gas deliveries that come in on (1) system (Atmos purchases) pipelines and (2) non-system (marketer deliveries or on behalf of non-AEM transporters) pipelines for the past 24 months. The total of the two percentages should equal 100%. Based on the forgoing, Stand Energy respectfully requests that AEC be ordered to produce the requested information.

b. Interrogatories 1-7(a):

AEC failed to give a full and complete answer to Interrogatory 1-7(a). Stand Energy's interrogatory is seeking to discover the names of both AEC's system supply sources as well as AEC's transportation supply sources. However, AEC only provided the names of its system supply sources. With regard to transportation supply sources, AEC's response provided that it "does not maintain a system for tracking the identity of transportation customer commodity suppliers and may not even know the identity of such suppliers inasmuch as transportation customers are directly responsible for procuring, managing and nominating their own commodity suppliers." The operative portion of AEC's response is that it "**may not even know the identity of such suppliers.**" Regardless of whether AEC has a system for tracking transportation suppliers or if it "**may not know,**" Stand Energy is entitled to the requested information, pursuant to the Tennessee Rules of Civil Procedure, if it is in AEC's "care, custody or control." AEC's response that it "may not know" implies that it did not use the 20 days given to answer Stand Energy's discovery requests to find out one way or the other. Based on the forgoing, Stand Energy respectfully requests that AEC be required to answer the question to the extent one of its employees can provide the requested information, even if the list is incomplete.

c. Interrogatories 1-10(b):

In response to Interrogatory 1-10(b), AEC objected on the grounds of relevance. The purpose of this proceeding is to determine the proper structure and fairness of the AEC transportation tariffs. Since the charge for services should be based on cost, the amount of revenue received by AEM is relevant and therefore discoverable. Based on the forgoing, Stand Energy respectfully requests that AEC be ordered to produce the requested information.

d. Interrogatories 1-11:

In response to Interrogatory 1-11, AEC objected on the grounds of relevance. Again, the purpose of this proceeding is to determine the proper structure and fairness of the AEC transportation tariffs. Therefore, the total of AEM revenue and allocation of same is relevant and will also provide Stand Energy with the information necessary to offer alternatives to the TRA. Based on the forgoing, Stand Energy respectfully requests that AEC be ordered to produce the requested information.

e. Interrogatories 1-17:

In response to Interrogatory 1-17, AEC objected on the grounds of relevance. Pursuant to the Tennessee Rules of Civil Procedure, Stand Energy is entitled to discovery information reasonably calculated to lead to the discovery of admissible evidence. Whether Atmos Energy has been involved in prior, similar proceedings and whether AEC now employs any of the individuals that were involved in those proceedings can clearly lead to the discovery of admissible testimony. Based on the forgoing, Stand Energy respectfully requests that AEC be ordered to produce the requested information.

f. Interrogatories 1-18:

AEC failed to give a full and complete answer to Interrogatory 1-18. AEC did not provide the financial harm to AEC's firm sales customers for the past 12 months. AEC's

response only tells how harm may occur. Based on the forgoing, Stand Energy respectfully requests that AEC be ordered to produce the requested information.

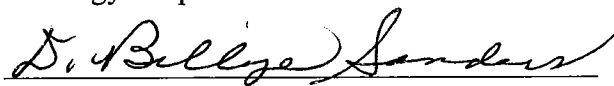
g. Interrogatories 1-19:

In response to Interrogatories 1-19, AEC states that “it is vague and indefinite . . . AEC does not understand what Stand wants in response to this request.” To the extent that AEC does not understand, Stand Energy is requesting the days during the past 12 months that customers either over-delivered when the system was short on gas or under-delivered when the system was long on gas. Based on the forgoing, Stand Energy respectfully requests that AEC be ordered to produce the requested information.

III. Conclusion

First, AEC’s refusal to provide information that it admits is known by its non-utility division, AEM, necessitates the joining of AEM as a party as well as a 30-day extension to all deadlines. Second, based on the reasons stated above, Stand Energy respectfully requests that AEC be required to provide full and complete responses to Interrogatories 1-6(e) and 1-6(g), 1-7(a), 1-10(b), 1-11, 1-17, 1-18, and 1-19. Finally, in light of the expedited schedule, Stand Energy respectfully requests that in addition to serving Stand Energy’s local counsel by hand delivery or electronic mail, that AEC be ordered to serve the answers to the interrogatories that are the subject of its motion to compel and all future discovery by electronic mail or via overnight early morning delivery to Stand Energy’s General Counsel, John Dosker (who is not located in Nashville), instead of by regular U.S. mail.

Respectfully Submitted,
Stand Energy Corporation

By: 
D. Billye Sanders
Attorney for Stand Energy Corporation

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motions were 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 30, 2007.

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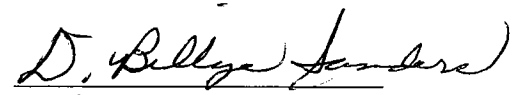
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D. Billye Sanders

filed electronically in docket office on 11/28/07

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

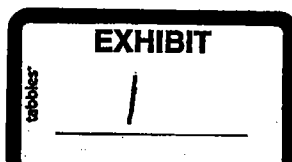
**IN RE: TARIFF FILING TO MODIFY)
AND ADD LANGUAGE REGARDING) TRA Docket No. 07-00020
TRANSPORTATION SERVICE)**

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

Atmos Energy Corporation ("AEC") respectfully submits its responses objections to the discovery requests submitted by Stand Energy Corporation ("Stand").

GENERAL OBJECTIONS

1. AEC objects to the definitions and instructions contained in the requests to the extent that the definitions and instructions attempt to impose on AEC a burden or obligation greater than that required by the *Tennessee Rules of Civil Procedure* and applicable statutes and regulations governing contested case hearings.
2. AEC objects to the definition of "identify" and "identifying" etc. as being unduly burdensome.
3. AEC objects to the requests to the extent they call for information and the production of documents protected from disclosure by the attorney-client privilege, common interest privilege, work product doctrine, or any other applicable privilege or protection. AEC objects to the requests to the extent that the Stand is attempting to impose on AEC obligations with regard to identification of privileged documents beyond those required by the *Tennessee Rules of Civil Procedure* and applicable statutes and regulations governing contested case



hearings, or to extend the requirements of Tenn. R. Civ. P. 26.02(5) beyond documents withheld based upon claims of privilege or work product.

4. AEC objects to Stand's requests to the extent they seek information relating to matters not at issue in this litigation or to the extent they are not reasonably calculated to lead to the discovery of admissible evidence. By providing information in response to these requests, AEC does not concede that such information is relevant, admissible, or discoverable, or that other information on the same or similar subjects would be discoverable. AEC expressly reserves the right to: (a) object to other discovery requests, despite their involving or relating to the subject matter of any of the interrogatories, document requests or requests for admission being responded to here; and (b) object to the introduction into evidence of any answer or produced document on relevancy or any other grounds.

5. AEC objects to Stand's requests to the extent that Stand is attempting to require AEC to provide information and produce documents beyond those in its possession, custody, or control as that phrase is used in the *Tennessee Rules of Civil Procedure* and applicable statutes and regulations governing contested case hearings.

6. AEC objects to Stand's requests to the extent that the purport to be directed to any entity other than AEC, including any parent, subsidiary, or affiliate. Any response to these requests is being provided by AEC only.

7. AEC's objections and responses to these requests are and will be based on information then known to it. AEC reserves the right to amend, modify or supplement its objections and responses if it learns of new information.

8. AEC's objections and responses to these requests are and will be made without waiving or intending to waive the right to object to the use of any information provided in any

subsequent proceeding or trial of this or any other action. AEC's responses to these requests are also not a waiver of any of the foregoing objections or any objections it has made or may make with respect to any similar, related, or future request, and AEC specifically reserves the right to interpose any objection to further requests notwithstanding any response or lack of objection made in this response.

10. AEC objects to requests that seek "all" documents pertaining to a certain issue or falling into a certain category. Such requests by their nature are unduly burdensome, and unreasonably cumulative and duplicative. When served on a corporate or other institutional defendant, literal compliance with such a request is impossible to assure. Requiring a party to produce "all" documents showing a certain fact when one will do is, by its nature, unreasonably cumulative and duplicative. And such requests are often vague and indefinite. Where documents are produced in response to such a request, AEC has interpreted the request in light of reason and the matters at issue in this case, and has made a reasonable search for responsive documents. In so doing, AEC has complied with its discovery obligations.

11. AEC objects to Stand's instructions to the extent that they seek to impose an obligation to supplement these responses beyond the requirements of Tenn. R. Civ. P. 26.05.

12. For the sake of brevity, AEC expressly incorporates these general objections in response to each of Stand's discovery requests in this case.

RESPONSES AND OBJECTIONS TO SPECIFIC REQUESTS

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:

Subject to and without waiving its General Objections, AEC responds as follows:

Please see the spreadsheet attached hereto and labeled *Stand 1-1*. Data for parts D, G, and J are not readily available in the format requested, and cannot be produced without creating an customized IT query to pull the data and a lengthy review process. However, the total

number of meters by customer class should be very similar to the total number of customers which has been provided.

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

Pat Childers

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:

Subject to and without waiving its General Objections, AEC responds as follows:

Please see the attached spreadsheet labeled *Stand-ATMOS 1-2 Goodyear Impact.xls*.

Goodyear asked for a potential impact, but Goodyear's agent (Kimball Resources) noted that had these changes been in place, the agent would have managed deliveries differently to avoid these scheduling fees.

With respect to how the scheduling fees will be calculated, please see the attached spreadsheet labeled *Stand - ATMOS 1-2 Scheduling Fee Calculation.xls*.

No other studies were done because the Company expects customers and marketers to more effectively manage deliveries once the changes go into effect in order to avoid penalties

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

Danny Bertotti

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:

Subject to and without waiving its General Objections, AEC responds as follows:

- A. Please see the folder labeled *Response to Stand 1-3, A and B*.
- B. Please see the folder labeled *Response to Stand 1-3, A and B*.
- C. Please see the spreadsheets in response to AIG 2 in the folder labeled *Customer Imbalance by Pipeline by Month* covering the last 24 months. Paper copies have not been provided due to the voluminous nature of the response. Note the daily imbalances calculated for each customer. Due to the number of days that are out of balance by more than 10%, either over or under, the Company has determined that Daily Balancing Fees are necessary.
- D. See response to C above.
- E. Necessity is determined by the connecting pipeline rules and regulations and is not a change in this proposal.
- F. See response to E above.

G. Please see attached spreadsheets in the folder labeled *Customer Imbalance by Pipeline by Month* covering the last 24 months. Note the daily and monthly imbalances calculated for each customer. Due to the number of days that are out of balance by more than 10%, either over or under, the Company has determined that Daily Balancing Fees are necessary. Monthly Cash Outs and OFO requirements are required by the connecting pipelines.

H – I. **Monthly Cash Out Rates and Formulas**– East Tennessee Natural Gas Tariff, Nashville Gas Tariff, Chattanooga Gas Tariff, Columbia Gulf Transmission Proposed Tariff

OFO Penalty – Atmos Energy's Rate Schedule 250 Overrun Charge, East Tennessee OFO Penalty Rate shown in OFO and MADD order notices, Columbia Gulf Proposed Critical Notice Penalty.

Daily Scheduling Fees – Atmos Energy's Georgia and Missouri Transportation tariffs, Atmos Energy's Illinois Transportation Tariff, also see attached spreadsheet labeled *Stand – ATMOS 1-2 Scheduling Fee Calculation.xls* referenced in Response to 1-2 above.

J. Atmos cannot estimate the penalty dollars that might be generated associated with these proposals because Atmos expects customers and marketers to more effectively manage deliveries once the changes go into effect in order to avoid penalties

K. Any penalties assessed and collected pursuant to the proposals within the 260 Rate Schedule will be credited to the firm sales customers through a credit to the purchased gas adjustment. (See testimony of Patricia Childers)

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

Danny Bertotti (A - J), Pat Childers (K)

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:

Subject to and without waiving its General Objections, AEC responds as follows:

- A. Please see Bertotti Testimony pg 11 – 13
- B. Please see attached spreadsheet labeled *Stand – ATMOS 1-2 Scheduling Fee Calculation.xls* referenced in Response to 1-2 above.
- C. Please see attached spreadsheets labeled *Stand-ATMOS 1-2 Goodyear Impact.xls* and *Stand – Atmos 1-4 Marriott Impact*.
- D. There will be no revenue to the Company as a result of daily scheduling fees. All fees will be credited to the Company's firm sales customers through the purchased gas adjustment. (See response to 1-3 K and testimony of Patricia Childers)

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

Pat Childers (D)
Danny Bertotti (A-C)

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:

Subject to and without waiving its General Objections, AEC responds as follows:

- A. Please see response to 1-4A.
- B - C. See attached spreadsheet labeled *Stand-ATMOS 1-2 Scheduling Fee Calculation.xls* referenced in Response to 1-2 above. Because storage assets are used for daily balancing, the scheduling fees are designed to pass on storage costs to those customers who use storage each day they are out of balance by more than 10%.

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

Danny Bertotti

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:

Subject to and without waiving its General Objections, AEC responds as follows:

A. The following is a list of each interstate transmission pipeline with which Atmos

Tennessee distribution facilities have any point of delivery or interconnection:

Columbia Gulf*
East Tennessee Natural
Southern Natural
Tennessee Gas Pipeline
Texas Eastern*
Texas Gas Transmission

Under our current asset management agreement we have a Firm Natural Gas Exchange Agreement on both Columbia Gulf and Texas Eastern. We do have a separate Columbia Gulf FTS-1 contract in the Company's name.

B. The following is a list of maximum daily rated capacity for the points of deliveries and/or interconnections identified in (A) above:

CGT K#84924 – 5,000/day
TGP K#40876 – 53,656/day
TGP K#40878 – 20,000/day
ETN K#30774 – 84,588/day
ETN K#34538 – 27,500/day
SNG K#FSNG239 – 17,868/day
TGT K#T21483 – 1,000/day Summer; 2,000/day Winter
TGT K#G000750 – 4,120/day Summer; 7,495/day Winter

The maximum daily capacities by points of delivery are provided in the attached eight Confidential pdf files labeled *Stand 1-6 TGT K#T021483 CONF, CGT K#84924 CONF, ETN K#30774 CONF, ETN K#30777 CONF, ETN K#34538 CONF, TGP K#40876 CONF, TGT K#G000750 CONF, and SNG K#FSNG239 CONF.*

C. Please see the attached Confidential spreadsheet labeled *Stand 1-6, C,D,F CONF.xls* for the total pipeline deliveries.

D. Please see the spreadsheet referenced in C above for the system supply pipeline deliveries.

E. In addition to its General Objections, AEC objects to this request on the ground that it is vague and indefinite. AEC does not understand what this request is seeking.

F. Please see the spreadsheet referenced in C above for the non-system supply pipeline deliveries.

G. In addition to its General Objections, AEC objects to this request on the ground that it is vague and indefinite. AEC does not understand what this request is seeking.

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

Kenny Malter

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:

Subject to and without waiving its General Objections, AEC responds as follows:

- A. Please see the following list of AEC commodity suppliers for the Tennessee service area system supply delivery during the past 24 months:

Anadarko
Atmos Energy Marketing
Chevron Texaco
Equitable Energy
BP Energy
Atmos Energy Marketing
Shell Trading
Occidental

AEC does not maintain a system for tracking the identity of transportation customer commodity suppliers and may not even know the identity of such suppliers inasmuch as transportation

customers are directly responsible for procuring, managing and nominating their own commodity supplies.

B. For commodity system supply deliveries, please refer to column D in the spreadsheet provided in Response to subpart C of Request No. 1-6.

C. There were no monthly historic imbalances and no penalties incurred by AEC that were caused by or related to the supply obligations of the identified commodity suppliers for AEC's system supply. Inasmuch as AEC does not maintain a system for tracking transportation customer commodity suppliers, AEC cannot specify any such supplier that may have caused a historic imbalance or penalty. However, any imbalance or associated penalty attributable to any transportation customers are shown on the spreadsheets attached hereto in response to AIG 2 in the folder labeled *Customer Imbalances by Pipeline by Month*. The daily and monthly imbalance for each transportation customer for the past 24 months are shown along with the cash out charges for the respective monthly imbalances.

D. See Response to C above.

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

Kenny Malter

Danny Bertotti

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:

Subject to and without waiving its General Objections, AEC responds as follows:

- A. Requests for Proposals (RFPs) are distributed approximately six (6) weeks prior to the effective date of April 1 along with a copy of the gas supply plan.
- B. A seasonal RFP was issued with an effective date of November 11, 2005; the winter plan was finalized September 12, 2005.
- C. A seasonal RFP was issued with an effective date of November 1, 2006; the winter plan

was finalized September 14, 2006.

NOTE: AEC will review the variances in the estimated storage levels resulting from actual requirements and the gas purchased, per the Gas Purchase Plan, for the current month.

These evaluations may result in a change to the planned purchases in the subsequent months or subsequent nominations.

D. AEC does not currently impose "on-system" OFOs on its Transportation customers. This is a provision in AEC's proposed revised transportation tariff. Pipeline OFOs and/or operational matching orders are issued and imposed by the FERC regulated pipelines, not by the local distribution company. Individuals in AEC's Gas Control and Gas Supply departments receive critical notices from the pipelines. As a courtesy to its transportation customers, AEC at its discretion may forward this information to the transportation customers and/or their agents via the AEC sales representatives. Interruptible customers may be curtailed by AEC as authorized by the TRA in the Company's tariffs.

E. See response to part D above regarding on-system OFO's.

F. N/A

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

Kenny Malter

Danny Bertotti

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:

Subject to and without waiving its General Objections, AEC responds as follows:

- A. Please see the Company's response to part A of Request 1-7 with respect to AEC's system suppliers. The same suppliers are applicable for the past 48 months. AEC does not maintain a system for tracking the identity of transportation customer commodity suppliers and

may not even know the identity of such suppliers inasmuch as transportation customers are directly responsible for procuring, managing and nominating their own commodity supplies.

B. Suppliers do not participate in the Company's transportation programs because the Company does not transport gas for them. The Company transports gas to eligible customers behind its city gates who have elected to receive such service from the Company.

C, D, and E. Atmos Energy has not waived any requirement set forth in the TRA-approved tariff.

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

Kenny Malter

Danny Bertotti

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:

- A. Subject to and without waiving its General Objections, AEC responds as follows:

Please see the attached Confidential Word file labeled *Response to Stand 1-10A, Conf.*

- B. In addition to its General Objections, AEC objects to this request on the grounds that that information sought is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

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

Kenny Malter

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:

In addition to its General Objections, AEC objects to this request on the grounds that that information sought is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

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

N/A

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:

Subject to and without waiving its General Objections, AEC responds as follows:

The Company has not waived any of its current tariff requirements.

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

Danny Bertotti

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:

AEC objects to subpart (i) on the grounds that it is premature, subject to this objection, and subject to and without waving its General Objections, AEC would refer to the witnesses for whom pre-filed testimony has been or will be filed in this case, the exhibits thereto, and the documents that it has produced and will produce in this matter.

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

N/A

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:

AEC objects to subpart (i) on the grounds that it is premature, subject to this objection, and subject to and without waving its General Objections, AEC would refer to the witnesses for whom pre-filed testimony has been or will be filed in this case, the exhibits thereto, and the documents that it has produced and will produce in this matter.

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

N/A

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:

- A. In addition to its General Objections, AEC objects to this request as premature. Aside from documents identified as exhibits to the pre-filed testimony in this matter, to which reference is made in response to this request, AEC has not determined which documents will be used as hearing exhibits in this matter.
- B. In addition to its General Objections, AEC objects to this request on the grounds that it seeks information that the identity of any consulting (non-testifying) experts is protected from disclosure by the work product doctrine.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

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

N/A

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:

Subject to and without waiving its General Objections, AEC responds as follows:

- A. On any day transportation customers are out of balance, Atmos must use its assets to balance the system. Assets are paid for by the firm sales customers.

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

Danny Bertotti

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:

In addition to its General Objections, AEC objects to this request on the ground that it is vague and indefinite. AEC does not understand what information Stand wants in response to this request.

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

N/A

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:

Subject to and without waiving its General Objections, AEC responds as follows:

- A. Yes, the Tennessee asset manager has the right to manage all the assets.
- B. The asset manager has the ability to accelerate or decelerate storage activities for the purpose of optimizing market conditions. This is more comparable to IT service, and not "no-notice" service. However, the storage balances are purely for the benefit of the utility sales customers.

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

Pat Childers

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:

Subject to and without waving its General Objections, AEC responds as follows:
AEC presumes that Stand means whether Atmos Energy Marketing uses any of the utility's firm transportation or storage capacity on a connecting interstate pipeline to ensure commodity deliveries to AEC's city gates on account of AEM's customers behind those city gates. In response, AEC would respond that it does not know nor is it privy to what transportation or storage capacity is actually used by AEM (whether AEM's directly held capacity or released capacity) in connection with such activities and that specific information would need to be obtained from AEM.

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

Pat Childers

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:

Subject to and without waving its General Objections, AEC responds as follows:

Atmos Energy Corporation has no knowledge of how marketers (whether affiliate such as AEM or non-affiliate such as Stand) charge their end-use customers.

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

Pat Childers

Stand - ATMOS 1-23:

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

RESPONSE:

Subject to and without waving its General Objections, AEC responds as follows:

See Response to Request 1-21.

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

Pat Childers

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

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:

In addition to its General Objections, AEC objects to this request on the grounds that it is vague and indefinite. AEC further objects that the request is unduly burdensome and unreasonably cumulative and duplicative if it is intended to seek the production of the same information in multiple forms (both in response to an interrogatory and also the production of "all" documents showing such information). Subject to and without waving these objections, AEC would refer to the response and objections to the corresponding interrogatory, and any documents produced in response thereto.

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

N/A

Respectfully submitted,

NEAL & HARWELL, PLC

By: 

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A. Scott Ross, #15634

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Nashville, TN 37219-2498

(615) 244-1713 – Telephone

(615) 726-0573 – Facsimile

Counsel for Atmos Energy Corporation

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 27th day of November 2007.

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() Mail Stephen Butler, Esq.
() Fax Office of the Attorney General
() Fed. Ex. Consumer Advocate and Protection Division
() E-Mail P. O. Box 20207
Nashville, TN 37202

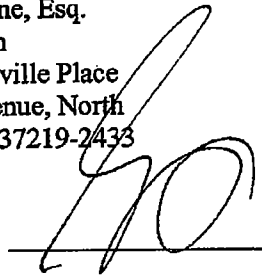
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Atmos Energy Marketing
Delivering Energy Solutions

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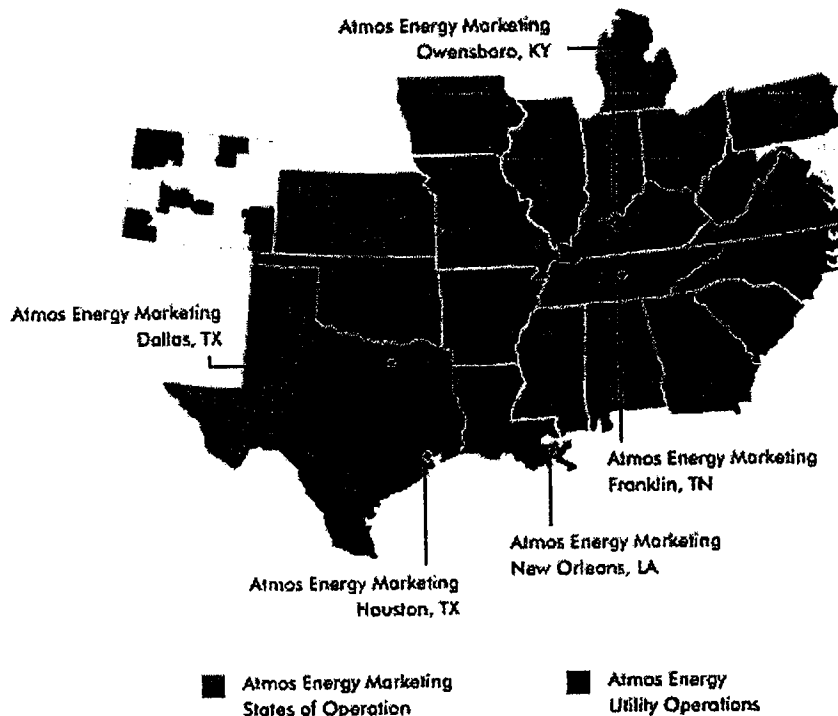
> Officer Biographies

About Atmos Energy Marketing

Atmos Energy Marketing is a full-service natural gas marketing company providing supply and asset management services to utilities, industrial facilities, power plants and gas producers. We have the resources and management systems necessary to deliver unparalleled reliability, flexibility and cost efficiency to all types of natural gas users – large and small.

Services include:

- Gas supply
- Gas supply management
 - Nominations
 - Scheduling
 - Balancing
- Pipeline contract negotiations
- Contract management
- Storage options and services
- Invoice review and verification
- Rate consulting
- Pre-paid gas supply
- 24-hour operations support
- Pricing and risk management strategies
 - NYMEX options
 - Price collars, caps, call options, swaps
 - Index-based and fixed-price contracts



Experience

Atmos Energy Marketing was founded in 1986 as Woodward Marketing, L.L.C. and was acquired by ATMOS Energy Corporation (NYSE: ATO) in April, 2001. Working with Atmos Energy Marketing gives you access to more than 120 employees with an average of 18 years of gas industry experience. These seasoned industry veterans currently provide supply and asset management services to approximately 1,000 industrial customers, power plants and local distribution systems in 21 states. Atmos Energy Marketing's highly qualified sales and operations teams have extensive experience working with interstate and intrastate pipelines in the southeast. In fact, many of our employees have been employed by the pipelines and local distribution systems that serve our customers.

EXHIBIT

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Our pipeline expertise enables us to assist customers with supply sourcing, pipeline contract negotiations and federal and state regulatory issues.

Reliability & Flexibility

AEM manages approximately 1,800,000 dth/day of firm pipeline capacity and 40,000,000 dth of market area and production area storage. These assets enable Atmos Energy Marketing to provide the highest level of reliability and flexibility in the industry to our 300,000,000 dth annual customer base.

Financial Strength

Atmos Energy Marketing has a solid balance sheet and a strong credit position. It currently holds credit lines with a diverse set of lenders and its parent company totaling \$680 million. The company's financial strength provides assurance that it can fulfill existing and future commitments to customers and suppliers. Atmos Energy Marketing is a wholly owned subsidiary of Atmos Energy Holdings, Inc. and is part of the non-utility division of Atmos Energy Corporation. Atmos Energy Corporation is financially strong with more than \$5.4 billion in assets and holds solid investment grade ratings with both Standard & Poor's and Moody's Investor Service.

Our Parent

Atmos Energy Corporation is a publicly traded natural gas distribution company (NYSE: ATO) headquartered in Dallas, Texas. Atmos Energy's seven utility divisions currently serve about 3.2 million customers in 12 states. The company is the largest pure-play natural gas distribution company in the United States. Atmos Energy's operations include:

- Atmos Energy Marketing: A full-service gas marketing company engaged in physical trading, financial trading, structured transactions and inventory management
- Atmos Pipeline and Storage: Operation of natural gas storage and associated pipeline facilities, including one of the largest intrastate natural gas pipelines in Texas
- Atmos Power Systems: Distributed generation projects for municipal and industrial customers
- Atmos Energy Services: Provides gas management services to utilities.