



BOULT ■ CUMMINGS®  
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December 3, 2007

Ron Jones, Director  
Tennessee Regulatory Authority  
460 James Robertson Pkwy.  
Nashville, TN 37243-0505

filed electronically in docket office 12/3/2007

***Re: In re: Tariff Filing to Modify and Add Language Regarding  
Transportation Service  
Docket: 07-00020***


Dear Director Jones:

AIG submits the attached Motion to Compel in the above-captioned docket.

The Motion was due on Friday, November 30, 2007 but is being filed today, December 3, 2007, one business day later. Since the Motion involves only a single question, AIG submits that the one-day delay is immaterial and not prejudicial to AEC. AIG therefore requests permission to submit this Motion to Compel

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:   
Henry Walker

HW/djc  
Enclosure  
cc: All parties of record

**IN THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

**December 3, 2007**

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

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**MOTION TO COMPEL**

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Atmos Intervention Group ("AIG") moves to require Atmos Energy Corporation ("AEC") to respond to Question 12. The question states:

From January 1, 2006 through August 31, 2007, provide the total gas volumes by month that were transported by Atmos Energy Corporation in their Georgia regulated markets, including a breakdown of these volumes transported between affiliate and non-affiliate suppliers.

AEC responded:

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

AIG request this information in order to determine the level of competition among marketers in AEC's service area in Georgia. It is AIG's understanding that AEC already has a daily balancing penalty in effect in Georgia. An examination of the level of competition in that state may indicate whether the imposition of a similar daily balancing fee in Tennessee would deter competitors from other, non-affiliated marketers.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

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

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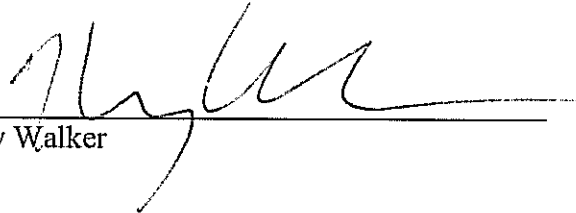
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on this the 3<sup>rd</sup> day of December 2007.

  
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Henry Walker