

**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 ENERGY CORPORATION'S SUPPLEMENTAL RESPONSES TO CERTAIN
DISCOVERY REQUESTS OF STAND ENERGY CORPORATION AND ATMOS
INTERVENTION GROUP**

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 [sic] [the original request ended here.]

In its Motion to Compel, Stand clarified Interrogatories 1-6(e) and 1-6(g), indicating: "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%."

SUPPLEMENTAL RESPONSE:

In light of Stand's clarification of this interrogatory, and subject to and without waiving its General Objections, AEC supplements and revises its original response to Stand 1-6 with the following:

Pipeline deliveries received on East Tennessee Natural (ETN) are utilized by both TN and VA customers (Bristol straddles the state line).

C. Please see the attached Confidential spreadsheet labeled *Stand 1-6 Suppl CDEFG CONF.xls* for the total pipeline deliveries. This spreadsheet supplements, revises and replaces the original Confidential spreadsheet labeled *Stand 1-6, C,D,F CONF.xls*. which should be disregarded.

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

E. Please see the spreadsheet referenced in C above.

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

G. Please see the spreadsheet referenced in C above.

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.

SUPPLEMENTAL RESPONSE:

Subject to and without waiving its General Objections, AEC supplements its response to this Interrogatory as follows:

A. In addition to the list of suppliers for system supply that Atmos Energy has already provided, Atmos Energy receives nominations from the following on behalf of its transportation customers:

Kimball Resources
BP
Constellation New Energy
Conoco Philips
Southstar Energy
Hess
Delta Energy

Atmos does not know whether those listed above actually provide gas supply for their customers, or just make the nominations on the customer's behalf.

C-D. Atmos Energy previously provided the monthly historic imbalances and the penalty revenues from its transportation customers in spreadsheets in the folder labeled *Customer Imbalances by Pipeline by Month*. Atmos Energy has received nominations from the following for the transportation customers shown in the spreadsheets.

Texas Gas

Customer A	Kimball Resources
Customer B	BP

Columbia Gulf

Customer A	Constellation New Energy
Customer B	Conoco Philips
Customer C	Southstar Energy

ETN

Customer A	Hess
Customer B	Constellation New Energy
Customer C	Hess
Customer D	Delta Energy
Customer F	Constellation New Energy
Customer G	Hess
Customer H	Constellation New Energy
Customer I	Constellation New Energy

Customer J	Southstar Energy
Customer K	Southstar Energy
Customer M	Southstar Energy
Customer N	Southstar Energy

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?

SUPPLEMENTAL RESPONSE:

In light of the clarification of this interrogatory contained in Stand's Motion to Compel, in which Stand indicated that "Stand Energy is requesting the days during the past 12 months that [transportation] customers either over-delivered when the system was short on gas or under-delivered when the system was long on gas," and subject to its General Objections, AEC submits the following supplemental response to this interrogatory:

In the short time available since Stand submitted its motion to compel revising this request, AEC has not yet been able to complete a review of the data needed to provide a definitive answer to this question. However, AEC believes it is probable that on each day of the past 12 months at least one of Atmos' nearly 100 transportation customers had over delivered when the system was short or at least one customer had under delivered when the system was long.

AIG – 3:

3. [a] Provide by month, from January 1, 2006 through August 31, 2007, the daily nominations for each day to each interstate pipeline in the Company's Tennessee service

territory. [b] Also provide the aggregate metered volume of each interstate pipeline for this same period. [c] In addition, identify the daily imbalance of each interstate pipeline and any associated daily balancing fees allocated to the Company by interstate pipelines attributable to these daily imbalances for this same time period.

SUPPLEMENTAL RESPONSE:

Subject to and without waiving its General Objections to this interrogatory, AEC provides a revised response to AIG Request 1-3(b), which can be found in the Confidential spreadsheet labeled AIG REVISED 1-3b vols CONF.xls

AIG – 12:

12. 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.

SUPPLEMENTAL RESPONSE:

Subject to and without waiving its General Objections, AEC provides the following supplemental response to this interrogatory:

AIG - 12

Month	Affiliate Mcf	Non-Affiliate Mcf	Total Mcf
Jan-06	202,321	73,904	276,225
Feb-06	195,318	65,291	260,609
Mar-06	164,155	70,563	234,718
Apr-06	114,751	58,687	173,438
May-06	106,798	61,562	168,360
Jun-06	99,127	60,676	159,803
Jul-06	94,673	59,021	153,694
Aug-06	96,936	68,391	165,327
Sep-06	97,456	63,271	160,727
Oct-06	130,408	55,925	186,333

Nov-06	171,455	49,131	220,586
Dec-06	179,285	47,812	227,097
Jan-07	221,072	57,806	278,878
Feb-07	198,675	55,821	254,496
Mar-07	152,301	59,581	211,882
Apr-07	127,753	58,928	186,681
May-07	111,704	60,730	172,434
Jun-07	102,218	62,492	164,710
Jul-07	106,760	58,167	164,927
Aug-07	298,478	61,484	359,962

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served, via the method(s) indicated below, on the following counsel of record, this the 6 day of December 2007.

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