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December 14, 2007

VIA HAND DELIVERY

Director Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

filed electronically in docket office on 12/14/07

Re: Atmos Energy Corporation Tariff Filing to Modify and Add Language
Regarding Transportation Service
Docket No. 07-00020

Dear Director Jones:

This letter comes in response to the letter of A. Scott Ross, Attorney for Atmos Energy Corporation ("AEC"), which was filed yesterday after the status conference and oral argument regarding Stand Energy Corporation's Motion to Join Atmos Energy Marketing ("AEM") as a party. While AEC's announcement that AEM has agreed to voluntarily provide responses to Stand's Discovery Requests 1-21 and 1-23 might resolve the issue of production with respect to the interrogatories in question, it does not moot Stand's Motion to Join AEM as a party.

As stated in our oral argument yesterday, Rule 19.01 requires joinder of a person who "...claims an interest relating to the subject of the action and **is so situated that the disposition of the action in the person's absence** may (i) as a **practical matter impair or impede the person's ability to protect that interest**, or (ii) leave any of the persons **already parties** subject to a substantial risk of incurring double, multiple, or otherwise inconsistent obligations by reasons of the claimed interest. If the person has not been so joined, the court shall order that the person be made a party. (emphasis added)

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AEM is Atmos Energy Corporation for the purpose of management of AEC's transportation and storage assets. Use of and fees charged for use of those assets are issues in this docket. Based upon its responses to interrogatories 1-21 and 1-23, AEC does not have the requisite knowledge or information regarding its assets to testify regarding them. Furthermore, as asset manager for AEC, AEM has an interest in the assets that it cannot protect without being a party to the proceeding. In addition, AEM's failure to be a party leaves the existing parties subject to the risk of being involved in subsequent litigation regarding the same. For these and the other reasons set forth in Stand's pleadings and oral argument, Stand's Motion to Join AEM is not moot.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Billye Sanders", written in a cursive style.

D. Billye Sanders
Attorney for Stand Energy
Corporation

cc: John M. Dosker
Parties of Record