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January 17, 2008

VIA HAND DELIVERY

Director Ron Jones, Hearing Officer Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37219

filed electronically in docket office on 01/17/08

Re: Atmos Energy Corporation's Tariff Filing to Modify and Add

Language Regarding Transportation Service

Docket No. 07-00020

Error in Order on Motion to Join Atmos Energy Marketing, LLC

Dear Director Jones:

On page 3 of your Order on Motion to Join Atmos Energy Marketing, LLC and Procedural Schedule, dated January 16, 2008 the following statement is made:

On December 13, 2007, following the Status Conference, AEC filed a letter in which it stated AEM has "agreed voluntarily to provide responses to the two discovery requests that prompted Stand to file its Motion-Stand 1-21 and 1-23". On January 2, 2008, AEM filed responses to the two discovery requests. No other related filings have been made. (emphasis added)

8 Letter from Scott Ross, Counsel for AEC, to Director Ron Jones (Dec. 13, 2007).

The statement that "No other related filings have been made" is inaccurate. On December 14, 2007, Stand Energy Corporation timely filed a letter (file-stamped copy attached) in response to the December 13 letter of Scott Ross. Stand's letter stated that AEC's announcement that AEM had agreed to voluntarily provide responses to Stand's Discovery Request might solve the issue of production with respect to the interrogatories in question, but does not moot Stand's Motion to join

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January 17, 2008 Page 2

AEM as a party and stated additional arguments in support of its position. No mention of this filing was made in the Order, therefore we assume it was not considered. The filing was also made electronically and was posted on the TRA website as of December 14, 2007.

For the record, we call this omission to the attention of the Hearing Officer and it is our position that the filing should have been considered in the Hearing Officer's determination.

Respectfully Submitted,

D. Billye Sanders

Counsel for Stand Energy Corporation

D. Bellye Senders

cc: John M. Dosker Parties of Record

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December 14, 2007

VIA HAND DELIVERY

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

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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December 14, 2007 Page 2

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, D. Bellya Junders

D. Billye Sanders

Attorney for Stand Energy

Corporation

cc:

John M. Dosker Parties of Record