

FILED
2015 JUL 14 3 57 PM
TENN. SEC. OF REVENUE

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF ATMOS ENERGY
CORPORATION FOR APPROVAL
OF TARIFF ESTABLISHING
ENVIRONMENTAL COST RECOVERY
RIDER**

)
)
)
)
)
)

DOCKET NO. 07-00081

**RESPONSE TO PETITION TO INTERVENE OF
ATMOS INTERVENTION GROUP**

Atmos Energy Corporation respectfully submits this response to the Petition to Intervene by Atmos Intervention Group (“AIG”). Authority Rule 1220-1-1-.01 defines a “Petitioner” as a “*person* filing or joining with others in filing an initial petition.” The Authority Rule governing intervention, Rule 1220-1-2-.08, requires a petition for intervention to state with particularity the facts demonstrating that the “petitioner’s” rights will be determined in the proceeding. Thus, to intervene in a matter, one must be a legal “person.”

Atmos Intervention Group does not claim to be a legal person or other legal entity, but rather describes itself as “an informal group of customers who purchase natural gas and/or gas transportation services from Atmos Energy Corporation.” Because it is not a legal entity, AIG would not have the right to intervene or otherwise participate in these proceedings in its own right.

AIG’s members may well include legal entities whose interests may be determined in this proceeding and who may have a valid right to intervene in these proceedings. However, these entities should be required to file a petition to intervene in which they are identified by name, on

the record in this case, and states facts that demonstrate their right to intervene, as required by Authority Rule 1220-1-2-.08(2).

The record in this case should reflect who the parties actually are, without reference to names or list names that may or may not have been filed in other pending cases.

Respectfully submitted,

NEAL & HARWELL, PLC

By: 

A. Scott Ross, #15634
2000 One Nashville Place
150 Fourth Avenue, North
Nashville, TN 37219-2498
(615) 244-1713 – Telephone
(615) 726-0573 – Facsimile

Counsel for Atmos Energy Corporation

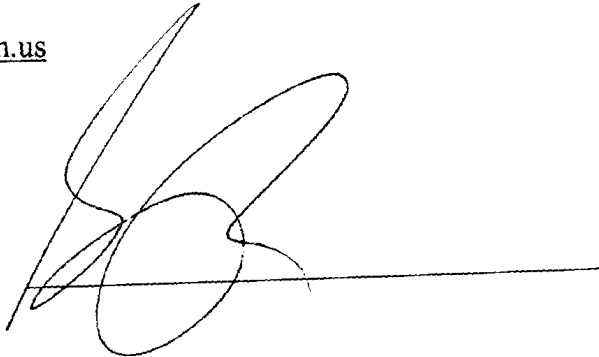
CERTIFICATE OF SERVICE

I certify that I have placed a true and exact copy of the foregoing in the United States
mail, postage prepaid, addressed to:

Henry M. Walker
Boult, Cummings, Conners & Berry
1600 Division Street, Suite 700
P. O. Box 340025
Nashville, TN 37203
and Via E-mail: hwalker@boultcummings.com

Joe Shirley
Office of Attorney General
Consumer Advocate and Protection Division
425 Fifth Avenue, North
P. O. Box 20207
Nashville, TN 37202-4015
and Via E-mail: joe.shirley@state.tn.us

This 11th day of June 2007.

A handwritten signature in black ink, appearing to be "Joe Shirley", is written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke extending to the right.