

**IN THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

In re: Petition of Atmos Energy Corporation                     )  
for Approval of a General Rate Increase                     )         Docket No. 07-00105  
   )         filed electronically 6/22/07 @ 11:10am

**CONSUMER ADVOCATE AND PROTECTION DIVISION'S OBJECTIONS TO FIRST  
DISCOVERY REQUESTS OF ATMOS ENERGY CORPORATION**

Robert E. Cooper, Jr., Attorney General and Reporter, through the Consumer Advocate and Protection Division of the Office of the Attorney General {"Consumer Advocate"}, pursuant to the Hearing Officer's directive, respectfully submits its objections to the first discovery requests of Atmos Energy Corporation ("Atmos").

**OBJECTIONS TO INDIVIDUAL SPECIFIC REQUESTS**

1. Please identify each person whom you expect to call as an expert witness at the hearing on the merits in this docket, and for each such expert witness:
  - (a) Identify the field in which the witness is to be offered as an expert;
  - (b) Provide complete background information, including the witness's current employer, as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify;
  - (c) Identify all publications written or presentations presented in whole or in part by the witness, including either a copy of all such publications and presentations or a reference to where such publications and presentations may be publicly obtained;
  - (d) Provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
  - (e) Identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and

forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;

- (f) Identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;
- (g) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert; and
- (h) Please produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, file notes, chart notes, tests, test results, interview notes, and consultation notes provided to, reviewed by, utilized by, relied upon, created by, or produced by any proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter.

RESPONSE:

**OBJECTION:** The Consumer Advocate adopts the objection of Atmos to the Consumer Advocate's discovery request no. 127, which is substantially the same as Atmos's discovery request no. 1.

- 2. Please identify the name and location of all persons having knowledge of discoverable matters in this case.

RESPONSE:

**OBJECTION:** The Consumer Advocate adopts the objection of Atmos to the Consumer Advocate's discovery request no. 128, which is substantially the same as Atmos's discovery request no. 2.

- 3. Please produce copies of all hearing exhibits that you plan to introduce, use, or reference at the hearing on the merits in this docket..

RESPONSE:

**OBJECTION:** The Consumer Advocate adopts the objection of Atmos to the Consumer Advocate's discovery request no. 130, which is substantially the same as Atmos's discovery request no. 3.


4. Please provide all Excel (or other data files) containing the information provided in response to these request items.

RESPONSE:

**OBJECTION:** The Consumer Advocate adopts the objection of Atmos to the Consumer Advocate's discovery request no. 135, which is substantially the same as Atmos's discovery request no. 4.

Respectfully submitted,

Robert E. Cooper, Jr.  
Attorney General and Reporter  
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## CERTIFICATE OF SERVICE

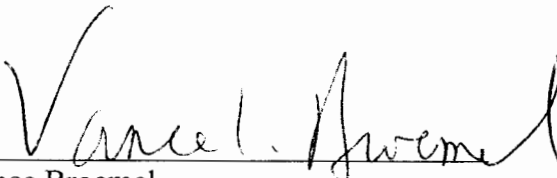
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or facsimile on June 22<sup>nd</sup> 2007 to:

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