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
	,	Docket No. 07-00105
)	

CONSUMER ADVOCATE'S MOTION FOR ADDITIONAL DISCOVERY REQUESTS

Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division ("Consumer Advocate"), pursuant to the amended procedural schedule entered by the Hearing Officer on July 2, 2007, hereby requests the Authority to allow the Consumer Advocate to submit a second set of discovery requests. For good cause, the Consumer Advocate notes the following:

- 1. The procedural schedule specifically permits additional discovery for good cause.
- 2. The second set of discovery requests submitted by the Consumer Advocate deals with depreciation, which is an issue raised by Atmos in this case. The information sought is discoverable, relevant and important.
- 3. The Consumer Advocate has retained an outside expert to assist with the depreciation issue. Due to an inadvertent miscommunication, the majority of discovery requests that the depreciation expert wanted to submit were omitted from the Consumer Advocate's first set of discovery requests.
- 4. The Consumer Advocate submits the second set of discovery requests relatively early in the litigation. Significant time remains before the Consumer Advocate's testimony is due to be filed. There is no real prejudice to Atmos involved in this request, and the denial of this request would result in prejudice to the Consumer Advocate on an issue raised by Atmos in this case.

- 5. The Consumer Advocate does not plan to submit any additional discovery requests, if this motion is granted and the Company responds adequately to the discovery requests. Approval of this request would expedite the completion of discovery.
- 6. The Consumer Advocate plans to raise the issue of second round discovery requests at the Status Conference scheduled for July 12, 2007.

Wherefore, the Consumer Advocate respectfully asks for permission to submit the proposed second set of discovery requests to be answered by Atmos on or before August 2, 2007.

Respectfully submitted,

Robert E. Cooper, Jr.
Attorney General and Reporter
State of Tennessee

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Dated: July _____, 2007

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail to:

Patricia Childers
Vice President, Rates & Regulatory Affairs
Mid-States Division
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this the _____ day of July, 2007.

Vance L. Broemel Senior Counsel

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