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February 19, 2008

## VIA HAND DELIVERY

Honorable Ron Jones, Hearing Officer c/o Sharla Dillon, Docket & Records Manager Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

RE: Docket to Evaluate Atmos Energy Corporation's Gas Purchases and Related Sharing Incentives, TRA Docket No. 07-00225

Dear Hearing Officer Jones:

Enclosed please find one (1) original and thirteen (13) copies of Atmos Energy Marketing, LLC's Responses to Stand Energy Corporation's First Set of Discovery for filing in the above-captioned docket. Also enclosed is a copy of this filing to be file-stamped for our records.

If you have any questions or require additional information, please let us know.

Respectfully submitted,

Melvin J. Malone

clw

c: Parties of Record

# BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE: DOCKET TO EVALUATE	)	
ATMOS ENERGY CORPORATION'S	)	
GAS PURCHASES AND RELATED	)	DOCKET NO. 07-00225
SHARING INCENTIVES	)	
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# ATMOS ENERGY MARKETING LLC'S RESPONSES TO STAND ENERGY CORPORATION'S FIRST SET OF DISCOVERY

Atmos Energy Marketing, LLC ("AEM"), by and through counsel, hereby responds to the First Set of Discovery Requests of Stand Energy Corporation ("Stand").

## **Confidential Information**

Where designated, certain written responses and documents responsive to Stand's First Set of Discovery contain information that constitutes confidential, proprietary information or trade secrets of AEM. This information is therefore subject to the terms of the Protective Order to be entered by the Hearing Officer in this case, consistent with the *Order on Protective Order Disputes*.<sup>1</sup>

#### **General Objections**

AEM objects to Stand's list of "Definitions" and "Instructions for Answering" that purport to govern AEM's responses to the discovery requests. AEM, rather, responds to the discovery requests in accordance with Rules 26, 33, and 34 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. Without waiving this general objection,

AEM Responses to Stand.DOC

<sup>&</sup>lt;sup>1</sup> See Order on Protective Order Disputes, TRA Docket No. 07-00225 (Feb. 14, 2008).

and subject to more specific objections set forth below, AEM responds to Stand's discovery requests as follows:

## **INTERROGATORIES**

1. In Case No. RM08-2-000, "FERC seeks public comment on a proposal to require both interstate and certain major non-interstate pipelines to post on a daily basis capacity, scheduled flow information and actual flow information. The proposal would facilitate transparency of price and availability of natural gas providing a complete picture of daily supply and demand information. .." December 20, 2007 FERC News Release.

What is AEM's position regarding FERC's proposed rule on pipeline posting requirements?

**RESPONSE:** AEM objects to this interrogatory on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, AEM's response is that it has not taken a position regarding FERC's proposed rule on pipeline posting requirements.

<u>Identify the Person(s) Responsible for providing the response</u>: AEM objects to this interrogatory on the grounds that it seeks information protected by the attorney-client privilege and the attorney work product doctrine. Without waiving this objection, AEM, by and through its attorneys, is responsible for providing this response.

# **VERIFICATION**

I, Mark H. Johnson, on behalf of Atmos Energy Marketing LLC, verify that the preceding answers and responses to the Discovery Requests submitted by the Stand Energy Corporation are true, accurate and correct to the best of my knowledge, information and belief.

On Behalf of Atmos Energy Marketing LLC

By:

Mark H. Johnson

Its:

**PRESIDENT** 

Melvin J. Malone E. Todd Presnell

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#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via first-class U.S. Mail, postage prepaid, or electronic mail upon:

Patricia Childers Vice President, Rates & Regulatory Affairs Mid-States Division **Atmos Energy Corporation** 810 Crescent Centre Drive, Suite 600 Franklin, Tennessee 37067-6226 pat.childers@atmosenergy.com

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Joe Shirley **Assistant Attorney General** Office of the Attorney General Consumer Advocate and Protection Division P.O. Box 20207 Nashville, Tennessee 37202

This the 19<sup>th</sup> day of February, 2008.

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