



ATTORNEYS AT LAW

1200 ONE NASHVILLE PLACE
150 FOURTH AVENUE, NORTH
NASHVILLE, TENNESSEE 37219-2433
(615) 244-9270
FAX (615) 256-8197 OR (615) 744-8466

Melvin J. Malone
Direct Dial (615) 744-8572
mmalone@millermartin.com

February 26, 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

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**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 Second Motion for an Extension of Time to Respond to First Found Discovery Requests from the CAD and AIG and Memorandum in Support* for filing in the above-captioned docket. We have attached 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 SECOND MOTION FOR AN EXTENSION OF
TIME TO RESPOND TO FIRST ROUND OF DISCOVERY REQUESTS FROM THE
CONSUMER ADVOCATE AND PROTECTION DIVISION AND AIG AND
MEMORANDUM IN SUPPORT**

Atmos Energy Marketing, LLC ("AEM"), by and through its undersigned counsel, hereby respectfully moves the Tennessee Regulatory Authority ("Authority" or "TRA") to grant it a second extension of time within which to respond to the First Round of Discovery Requests from the Office of the Tennessee Attorney General and Reporter, Consumer Advocate and Protection Division (the "CAD") and the Atmos Intervention Group (the "AIG").¹ More specifically, AEM requests a further extension until on or before 2:00 p.m. Tuesday, March 4, 2008. For the reasons set forth herein, AEM respectfully requests the Authority to grant this Motion.

I.

BACKGROUND

In large measure, the relevant procedural background underlying the basis for this Motion is set forth in the Authority's February 14, 2008, *Order on Protective Order Disputes* (the

¹ AEM responded to the First Round Discovery Requests of Stand Energy Corporation and to the Factual Issues Lists set forth in the *Order on December 13, 2007, Status Conference* on February 19, 2008.

“Order”)² and in the Authority’s *Order on December 13, 2007 Status Conference*,³ and thus will not be repeated here. On or about December 28, 2007, AEM was served with Discovery Requests by Stand Energy Corporation, CAD and Atmos Intervention Group (“AIG”). Notwithstanding the then outstanding disputes related to the Protective Order, these Discovery Requests, and particularly those submitted by the CAD, require the gathering, reviewing, organizing and production of a substantial amount information. Further, AEM was not able to access the *Order* from the Authority’s web site until the morning of February 15, 2008.

For the foregoing reasons, AEM sought and was granted a seven (7) day extension to respond to the First Round of Discovery Requests from both the CAD and AIG.⁴

II.

DISCUSSION AND ARGUMENT

AEM has worked diligently to comply with the First Round Discovery Requests since on or about December 28, 2007. Still, given the volume of the information requested, responding to the same has resulted in a substantial undertaking. Even if no documents produced by AEM were confidential, and thus required no such designation, AEM would have had to submit its initial request for additional time to adequately respond to the Discovery Requests due to the large volume of information requested. Given the substantial volume of information requested, the fact that some of the information requested is not kept by AEM in the normal course of business and was produced by AEM in good faith for the sole purpose of responding to the Discovery Requests, and the confidential designations that are required, responding to the discovery requests of the CAD and AIG has resulted in an exhaustive process.

² *Order on Protective Order Disputes*, TRA Docket No. 07-00225 (Feb. 14, 2008) (“Order”).

³ *Order on December 13, 2007 Status Conference*, TRA Docket No. 07-00225 (Dec. 21, 2007).

⁴ AEM was granted an extension from February 19 to February 26th. See *Order Granting Request for Extension*, TRA Docket No. 07-00225 (Feb. 15, 2008).

In good faith, and respecting the procedural Orders of the Authority, AEM and its counsel have retained the services of a professional, third party documents specialist firm to aid AEM and its counsel in responding to the Discovery Requests. Still, the production of approximately 29,000 documents, requiring various designations, is a time-consuming task.

For the foregoing reasons, AEM needs more time to respond to the Discovery Requests of the CAD and AIG. Though AEM is of the opinion that a substantial amount of work remains to be done to respond to said Discovery Requests, it will make every reasonable attempt to comply, if the extension is granted, before 2:00 p.m., Tuesday, March 4, 2008.

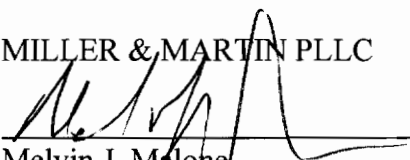
III.

CONCLUSION

For the foregoing reasons, AEM requests the Authority to grant it an extension to respond to the First Round of Discovery Requests from the CAD until on or before 2:00 p.m., Tuesday, March 4, 2008. Should an extension be granted, if AEM can submit the responses before Tuesday, March 4, 2008, it will do so.

Respectfully Submitted,

MILLER & MARTIN PLLC



Melvin J. Malone
E. Todd Presnell
Miller & Martin PLLC
1200 One Nashville Place
150 Fourth Avenue, North
Nashville, Tennessee 37219-2433
(615) 744-8572 Telephone
(615) 256-8197 Facsimile
mmalone@millermartin.com
tpresnell@millermartin.com

Attorneys for Atmos Energy Marketing, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been sent electronically to the following parties of record this 26th day of February, 2008.

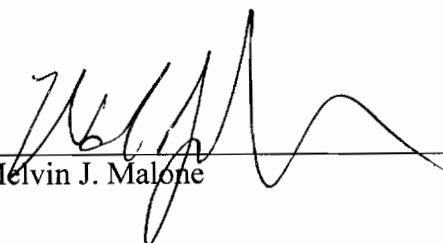
Timothy Phillips
Vance L. Broemel
Joe Shirley
Cynthia Kinser
Office of Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202

Henry Walker
Boult, Cummings, Conners & Berry
1600 Division Street, Suite 700
P.O. Box 340025
Nashville, TN 37203

D. Billye Sanders
Waller, Lansden, Dortch & Davis, LLP
511 Union Street, Suite 2700
Nashville, TN 37219

John M. Dosker
General Counsel
Stand Energy Corporation
1077 Celestial Street
Rockwood Building, Suite 110
Cincinnati, OH 45202-1629

William T. Ramsey
A. Scott Ross
Neal & Harwell
150 4th Avenue North, Ste. 2000
Nashville, TN 37219


Melvin J. Malone