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D. Billye Sanders
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February 14, 2008

VIA HAND DELIVERY

Eddie Roberson, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37219

filed electronically in docket office on 02/15/08

Re: Request of Atmos Energy Corporation for Approval of Contract(s)
Regarding Gas Commodity Requirements and Management of
Transportation Storage Contracts
TRA Docket No. 08-00024
Stand Energy Corporation's Petition to Intervene and Motion to
Stay

Dear Chairman Roberson:

Enclosed you will find the original and four copies of Stand Energy Corporation's Petition to Intervene and Motion to Stay the above referenced docket. A check for \$25.00 for the filing fee is enclosed. This filing has also been made electronically.


Stand Energy Corporation respectfully requests expedited treatment of its Petition to Intervene in and Motion to Stay the proceeding inasmuch as Atmos Energy Corporation has already issued the RFP that is the subject of this docket and has requested responses to the RFP by February 29, 2008.

Please contact me if you need additional information.

February 15, 2008

Page 2

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Billye Sanders".

D. Billye Sanders

Attorney for Stand Energy Corporation

cc: John M. Dosker
Atmos Energy Corporation
Parties of Record in TRA Docket No. 07-00225

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

IN RE: REQUEST OF ATMOS)	
ENERGY CORPORATION FOR)	
APPROVAL OF CONTRACT)	DOCKET NO. 08-00024
REGARDING GAS COMMODITY)	
REQUIREMENTS AND)	
MANAGEMENT OF)	
TRANSPORTATION STORAGE)	
CONTRACTS)	

PETITION TO INTERVENE

Stand Energy ("Petitioner") by and through its undersigned counsel, hereby seeks leave to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310 and Tennessee Regulatory Authority ("TRA") Rule 1220-1-2-.08. In support of this Petition, Petitioner states as follows:

Stand Energy is an independent marketer of retail energy, including natural gas. Stand Energy competes with Atmos Energy Corporation (Atmos) and/or its affiliate, Atmos Energy Marketing, LLC in Ohio, Virginia, Kentucky and Tennessee. The management and use of Atmos' assets and its gas purchasing practices affect the competitive environment for an independent marketer such as Stand Energy. Stand Energy is a potential respondent to the RFP that will result in the award of the contract to be approved in this docket. Even if Stand does not respond to the RFP, the contract that will be awarded will provide for the management of Atmos' assets and the terms of such management affect the gas

market in Tennessee. Consequently, the determinations in this proceeding may affect Petitioner's legal rights, duties, privileges, immunities, or other legal interests.

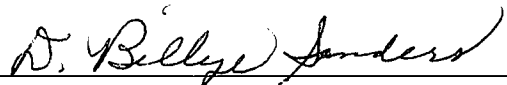
The granting of this Petition will not impair the interest of justice or the orderly and prompt conduct of these proceedings.

Wherefore, the Petitioner respectfully prays that the Authority grant its Petition to Intervene and grant such other relief as may be appropriate.

Notices and other communications regarding this Petition to Intervene should be sent to:

D. Billye Sanders
Waller Lansden Dortch & Davis, LLP
511 Union Street, Suite 2700
Nashville, Tennessee 37219
Phone: (615) 850-8951
Email: bsanders@wallerlaw.com
and
John M. Dosker, General Counsel
Stand Energy Corporation
1077 Celestial Street
Rookwood Building
Suite 110
Cincinnati, OH 45202-1629
Phone: (513) 621-1113
Email: JDosker@stand-energy.com

Respectfully Submitted,
Stand Energy Corporation

By: 
D. Billye Sanders
Attorney for Stand Energy Corporation

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motions were served upon the following parties of record or as a courtesy, via U.S. Mail postage prepaid, express mail, hand delivery, or electronic transmission, on February 15, 2008.

William T. Ramsey, Esq.
A. Scott Ross, Esq.
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2000 One Nashville Place
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Vance L. Broemel
Joe Shirley
Stephen Butler
Robert E. Cooper, Jr.
Office of the Attorney General
Consumer Advocate and Protection Division
PO Box 20207
Nashville, TN 37202

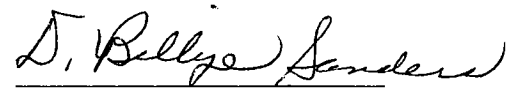
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Nashville, TN 37219


D. Billye Sanders

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

IN RE: REQUEST OF ATMOS ENERGY)	
CORPORATION FOR APPROVAL OF)	
CONTRACT(S) REGARDING GAS)	
COMMODITY REQUIREMENTS AND)	TRA Docket No. 08-00024
MANAGEMENT OF TRANSPORTATION)	
STORAGE CONTRACTS)	

STAND ENERGY CORPORATION'S MOTION TO STAY

Comes now Stand Energy Corporation ("Stand Energy") and files this Motion to Stay the Atmos Asset Management RFP and TRA Docket No. 08-00024 pending further order of the Tennessee Regulatory Authority. In support of Stand Energy's motion, Stand Energy respectfully states as follows:

1. The Federal Energy Regulatory Commission ("FERC") has issued a Notice of Proposed Rulemaking indicating that the FERC is currently reviewing changes to rules relative to asset managers.¹ See Notice of Proposed Rulemaking ("NOPR") attached hereto as Exhibit 1. Atmos Energy Corporation ("AEC") filed Comments in that proceeding wherein AEC acknowledged the Commission's jurisdiction over AEC (See attached Exhibit 2, p. 2).

2. AEC and AEM are currently being investigated by the Division of Investigations of the Office of Enforcement of the Federal Energy Regulatory Commission into "possible violations of the FERC's posting and competitive bidding regulations for pre-arranged released firm capacity on natural gas pipelines." See AEC's Securities and Exchange Commission filing

¹ The FERC Docket No. is RM08-1-000. The legal citation to the NOPR is 72 Fed. Reg. 65,916 (November 26, 2007), 121 FERC ¶ 61,179.

dated December 13, 2007 attached hereto as Exhibit 3. On information and belief, AEM has a "self-implementing" FERC Certificate to engage in capacity release and other transactions on interstate pipelines. AEM's FERC Certificate can be revoked for a wide variety of reasons. Certainly, a matter serious enough to involve FERC enforcement may be serious enough to potentially revoke AEM's Certificate and thereby prevent AEM from performing its legal duties as asset manager. The outcome of this Federal investigation could impact the remedy available to the TRA or the Tennessee ratepayers that may have been harmed by improper practices that underutilized ratepayer assets for the sole benefit of AEM.

3. AEC recognizes regulatory contingencies in Exhibit B at page 12 of its most recent TRA filing relating to the Asset Management RFP in TRA Docket No. 08-00024:

"Regulatory Out" language must be included in the agreement addressing the potential for regulations which may render the agreement illegal or unenforceable or materially adversely affecting the ability of Atmos or the Asset Manager to perform this agreement. For either party;

1. a court or governmental agency with jurisdiction (including without limitation a Tennessee Regulatory Authority, the Virginia State Corporation Commission or the Federal Energy Regulatory Commission) reverses, withdraws or otherwise modifies, **with a result unacceptable to such party in its sole discretion**, any applicable law, regulation, order, ruling, opinion or other determination believed to be necessary to proceeding with the transactions contemplated under the Agreement. (emphasis added).

2. such change causes the impacted Party to incur any material capital or operating cost, or loss of opportunity, related to the provision or receipt of services contemplated herein, or performance according [sic] the terms of the agreement would be in violation of any applicable law, regulation, order, ruling or opinion.

3. the Parties are unable, after good faith negotiations, to renegotiate the Agreement to comply with such reversal, withdrawal or modification and maintain the same level of service or benefit.

For Asset Manager if a court or government agency with jurisdiction determines that Asset Manager is subject to jurisdiction of the Tennessee Regulatory Authority or the Virginia State Corporation Commission as a result of the execution, delivery or performance of any Agreement.

AEC's proposed language is not in the best interests of the asset manager that may be awarded the contract, the TRA, or AEC's ratepayers who continue to be subject to regulatory uncertainty pending the outcome of the FERC investigation, the FERC asset management rule making proceeding (FERC Docket No. RM08-1-000) and the TRA's asset management investigation (TRA Docket –7-000225).

4. AEC's RFP was issued the first week of February by a letter dated January 29 with a deadline of February 29, 2008 at 12:00 p.m. CST. Stand Energy received a copy of the RFP on January 30, 2008. On February 6 and February 11 Atmos posted the announcement for the RFP in *Gas Daily*. Service under the Agreement is proposed to commence on April 1, 2008 and continue for a term of three (3) years. Given the timing and related nature of the FERC rulemaking proceeding and the significance of entry into a three-year contract for an Asset Management Agreement, the TRA should refrain from making such an important decision within the time requested by AEC. Moreover, the TRA should not approve the RFP and the award of a three-year asset management contract during the pendency of the FERC rulemaking proceeding, especially in light of the "regulatory out" language. In order to maintain the status quo, pending the outcome of the FERC rulemaking proceeding, AEM should be allowed to continue managing the assets on a month-to-month basis until the FERC rulemaking proceeding is concluded and a new asset manager contract is awarded.

5. The Atmos Asset Management RFP contains requirements that favor the incumbent affiliate (AEM) and AEM may be the only marketer that can fulfill them. For

example, the RFP requires the asset manager to displace gas from Texas Gas Pipeline to Columbia Gulf Transmission Pipeline and provide its own capacity delivery up to 50,000 dts/day. Normally, the local distribution company (LDC) contracts for the capacity on the pipeline and that capacity can be used by any asset manager with which the LDC contracts. Columbia Gulf Transmission is fully subscribed and AEM presumably already has an existing arrangement in place that may not be able to be duplicated by other asset managers.²

6. It would benefit the ratepayers, the TRA and the intervenors in TRA Docket No. 07-000225³ to hold this new docket (TRA Docket No. 08-00024) in abeyance pending completion of the asset management docket (TRA Docket No. 07-00225) and the FERC rulemaking proceeding.⁴ Until the TRA and parties in the asset management docket get their collective arms around AEC's activities, continuing with the RFP process prior to conclusion of the FERC rulemaking proceeding and TRA's investigation into AEC's asset management arrangement (TRA Docket No. 07-00225) might perpetuate and/or increase any inequity or harm currently being suffered by ratepayers, market participants and potential market participants. A stay would also allow the parties in the asset management docket an opportunity to provide their recommendations to the TRA and the TRA to make its ruling regarding the relationship between AEC and its asset manager before AEC enters into a three-year contract. Although the asset management docket is directed at the relationship between AEC and its affiliate, AEM, the outcome could affect the framework of the arrangement between a third-party asset manager as well. Based on these reasons, Stand Energy respectfully requests that the TRA stay the Atmos

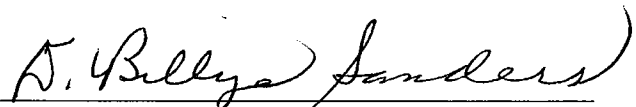
² Stand Energy does not know AEM's arrangement for pipeline capacity that serves AEC or why AEC does not contract for the capacity. Perhaps, AEM has contracted with a third party holder of pipeline capacity. Hopefully, this is something that can be clarified in the asset management docket (TRA Docket No. 07-000225).

³ Docket to Evaluate Atmos Energy Corporation's Gas Purchases and Sharing Incentives

⁴ Stand Energy anticipates that the FERC proceeding will conclude in April 2008.

Asset Management RFP and TRA Docket No. 08-00024 pending the outcomes of FERC Docket No. RM08-1-000 and TRA Docket No. 07-00225.

Respectfully Submitted,
Stand Energy Corporation

By: 
D. Billye Sanders
Attorney for Stand Energy Corporation

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motions were served upon the following parties of record or as a courtesy, via U.S. Mail postage prepaid, express mail, hand delivery, or electronic transmission, on February ____, 2008.

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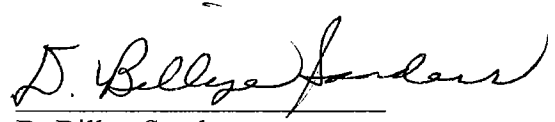

D. Billye Sanders

EXHIBIT 1



FEDERAL ENERGY REGULATORY COMMISSION

NEWS

November 15, 2007
Docket No. RM08-1-000

NEWS MEDIA CONTACT
Tamara Young-Allen - 202.502.8680

Proposed Rules Seek to Improve Efficiency of Pipeline Capacity Release Markets

The Federal Energy Regulatory Commission today proposed new rules designed to promote more efficient natural gas pipeline capacity release markets by easing certain restrictions on short-term capacity release transactions.

FERC proposes to revise its regulations governing the release of firm capacity on interstate natural gas pipelines by permanently removing the rate cap on capacity release transactions of one year or less.

"Today, FERC proposes a fundamental reform in our capacity release rules designed to improve the efficient use of our interstate natural gas pipeline network. Specifically, the proposed rule would permit market-based pricing for short-term capacity releases and facilitate asset management arrangements important to many gas utilities," FERC Chairman Joseph T. Kelliher said. "The proposed rule should strengthen competition in the secondary capacity release market and improve access to the interstate natural gas pipeline system. As a result, shippers will have more options for how they obtain natural gas supplies, which should benefit gas consumers."

By removing the rate cap for short-term capacity release transactions, FERC proposes to permit market-based pricing for short-term capacity releases. The Commission is not proposing to remove price caps for primary pipeline capacity because pipelines already have ample opportunities to enter into negotiated rate transactions above the maximum rate.

FERC also proposes to modify its regulations to facilitate the use of asset management arrangements, under which a capacity holder releases a portion or all of its pipeline capacity to an asset manager who agrees to supply the gas needs of the capacity holder.

Asset management arrangements are contractual relationships where a party agrees to manage gas supply and delivery arrangements, including transportation and storage capacity, for another party. Commenters said FERC's current capacity release regulations hinder asset management arrangements by making it more difficult for capacity holders to release their capacity to an asset manager of their choice.

The proposed rule recognizes the increased use of asset management arrangements in the natural gas industry and offers additional options to shippers needing gas service. The rule proposes to exempt capacity releases made as part of asset management arrangements from the prohibition on tying the release of capacity with release of capacity on other pipelines, taking assignment of gas purchase obligations or paying other compensation to the releasing shipper.

The proposed rule also would exempt asset management arrangements from the bidding requirements in section 284.8 of FERC's regulations.





The proposed rule would continue to require asset managers to remain subject to all posting and reporting requirements to ensure full disclosure and transparency for capacity release transactions. The proposed rule would also require pipelines to continue to provide notice of the released capacity.

Comments on the proposed rule must be submitted to FERC within 45 days after publication in the *Federal Register*. Comments must cite the docket number, RM08-1-000, and may be submitted electronically using the 'eFiling' link on FERC's webpage, www.ferc.gov or by postal mail to FERC, Office of the Secretary; Washington, DC 20426.

-30-

R-07-69

EXHIBIT 2

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C.

In the Matter of:

Promotion of a More Efficient
Capacity Release Market

)
)
)
)

Docket No. RM08-1-000

COMMENTS OF ATMOS ENERGY CORPORATION

Pursuant to the November 15, 2007 Notice of Proposed Rulemaking ("NOPR") issued by the Federal Energy Regulatory Commission ("FERC" or "Commission") in this proceeding, Atmos Energy Corporation ("Atmos"), hereby submits its initial comments in support of the Commission's proposed secondary market rule revisions designed to promote the use of Asset Management Arrangements ("AMAs"). As is explained in greater detail below, Atmos strongly supports the proposed modifications to the Commission's rules designed to facilitate the entry into AMAs by primary firm capacity holders in order to maximize the value of that firm capacity and to increase the throughput associated with the underlying firm interstate pipeline capacity rights. In its comments, Atmos also seeks clarification of one aspect of the Commission's proposed rule revisions related to the "tying" of storage capacity and associated storage inventory outside the context of AMAs.

I. CORRESPONDENCE AND COMMUNICATIONS

The names, titles, and addresses of the persons to whom correspondence in regard to this matter should be directed are:

Douglas C. Walther
Legal Department
Atmos Energy Corporation
Post Office Box 650205
Dallas, Texas 75265-0205

Brian S. Heslin, Esquire
Moore & Van Allen PLLC
100 North Tryon Street, Suite 4700
Charlotte, North Carolina 28202-4003

II. IDENTITY AND INTERESTS

Atmos Energy Corporation (Atmos) is a corporation organized under the laws of the state of Texas, is engaged in the natural gas distribution business in the states of Colorado, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Missouri, South Carolina, Tennessee, Texas and Virginia, and has its principal place of business in Dallas, Texas. Atmos is one of the largest all gas natural gas local distribution companies in the United States. It provides natural gas sales and transportation service to more than 3 million end-use customers in 12 states and is a customer of 26 interstate natural gas pipelines subject to the jurisdiction of the Commission. Atmos and its customers will be directly impacted by the proposed rule revisions set forth in the NOPR, including proposals to permit market based pricing for short-term capacity releases and proposals to facilitate asset management arrangements by relaxing the Commission's prohibition on tying and on bidding requirements for certain capacity releases made in the context of AMAs.

III. COMMENTS

Atmos' comments in this proceeding consist of general comments in support of the Commission's proposed rule revisions, and additional comments in support of the ability to "tie" the release of storage capacity to the assignment of storage inventory outside the context of AMAs.

A. Atmos Supports the Commission's Proposed Revisions of its Rules to Promote Asset Management Arrangements.

The Commission's secondary market rules were developed to permit firm capacity holders, who pay straight-fixed variable rates to interstate pipelines for the right to move gas on a primary firm basis, a means to recoup some of the investment in upstream capacity when that

capacity is not needed by the primary firm capacity holder. These rules permit primary firm capacity holders to segment and release capacity to third-parties at prices up to the maximum tariff rates thereby facilitating the creation of a secondary firm capacity market. This market has proven to be very advantageous to the industry as it has allowed market participants to access unused capacity when not needed by the primary capacity holder through individual release transactions. The integrity of this market has been maintained through FERC's prearranged maximum rate release cap and "post and bid" requirements.

One common attribute of these secondary market transactions, at least when engaged in by natural gas local distribution companies ("LDCs"), is that sales in the secondary market – either in the form of short-term capacity releases or off-system sales – serve to reduce the costs to LDC customers who pay for upstream gas costs.

The secondary market initially consisted of individual release transactions and/or individually negotiated off-system sales, where an LDC would locate a potential buyer in need of either interstate capacity or a delivered supply at a time when the LDC did not need all of its capacity (or supply) to serve its customers. This approach to secondary market transactions was beneficial but somewhat inefficient as LDCs typically did not have large marketing departments or substantial expertise in locating potential customers.

As the secondary market matured, natural gas marketers perceived value in being able to manage the aggregate capacity and supply rights of multiple LDCs in order to effectuate larger and more sophisticated secondary market and spot market sales while also serving the delivered gas needs of LDCs. These transactions typically involved the release of capacity and the related assignment of supply to marketers by LDCs subject to a requirement that the marketer provide a delivered service to the LDC sufficient to meet its needs to its customers. In return, the marketer was able to utilize the supply assets and capacity to serve third-parties when those assets were not needed to serve the LDC. This incremental advance in secondary market activity dramatically increased both the value of capacity in the secondary market – and

the amount of gas costs being returned to end-use customers through State mandated recovery mechanisms. Further, the load factor efficiency of individual natural gas pipelines through which larger volumes of gas were being delivered also increased.

The only impediment to this evolving secondary market was some latent ambiguity about the Commission's rules and regulations and what was technically permitted in this context, particularly with respect to the Commission's policy on "tying" and its prohibition on releases of capacity at above the maximum tariff rate. These ambiguities lead to substantial confusion in the market over what form or forms of asset management arrangements were permissible and ultimately lead to the requests for clarification that indirectly prompted this Rulemaking.

Atmos strongly supports the Commission's proposed rule revisions designed to clarify the rules applicable to asset management arrangements and also supports the Commission's conclusion that asset management deals are in the public interest. The proposed rule changes in this proceeding are a logical step in the development of a vibrant and efficient secondary natural gas market and provide benefits to all participants in that market without any serious risk of harm to any party. In particular, FERC's proposed rules will benefit end-users of natural gas by ensuring the most efficient expenditure of dollars for upstream capacity and supply needed to serve those customers with the maximum recoupment of costs when those assets can be efficiently used by other parties.

Lifting the maximum rate cap on releases of one year or less, as well as exempting asset management arrangements from the prohibition on tying and on the need to post and bid capacity releases used for asset management will substantially ease the current impediments to engaging in these beneficial transactions and should be adopted by the Commission. These rule and policy changes will facilitate highly beneficial transactions in the secondary market which are currently in a state of disarray and disruption as the industry struggles with uncertainty about the scope of the Commission's existing rules. Atmos urges the Commission to adopt its proposed new rules expeditiously.

B. Primary Storage Capacity Holders Should Be Permitted to “Tie” the Assignment of Storage Inventory to the Release of Storage Capacity.

Atmos supports the Commission’s proposed exemption of AMAs from the prohibition against tying and supports the conclusion that such arrangements will allow firm shippers to pre-arrange releases of capacity in a bundled transaction and will “ensure that the released capacity will continue to be used to support the releasing shipper’s acquisition of needed gas supply.” *Id.* at p. 53. As the Commission has stated: “The very purpose of the transaction is frustrated if the releasing shipper cannot combine the supply and capacity components of the deal.” *Id.* Atmos agrees that these proposed changes will foster maximization of the interstate pipeline grid and will enhance competition.

In response to the Commission’s request for comments on whether it should clarify its prohibition on tying to allow a releasing shipper to include conditions in a storage release concerning the sale and/or purchase of gas in storage inventory outside the AMA context, Atmos supports such a clarification. Atmos supports the ability of releasing shippers to “tie” storage capacity with storage inventory such that releasing shippers would be permitted to require that replacement shippers take inventory as a condition of release, even in circumstances outside the AMA context. Tying storage capacity with storage inventory will allow the releasing shipper greater ease in releasing capacity and will enable transactions to be consummated more readily. Seeking separate purchasers for inventory and capacity does not guarantee that the capacity will go to the person who values it the most, but rather, places an undue burden on the releasing shipper.

Moreover, the nature of the relationship between storage capacity and storage inventory calls out for a waiver of the tying rule when releasing storage capacity. In effect, storage capacity is unusable without associated storage inventory and storage inventory is unusable

without associated storage capacity¹. Maintaining the tying prohibition with respect to releases of storage capacity simply causes shippers who wish to release and acquire storage capacity to engage in artificial (and potentially economically harmful) transactions simply to comply with the prohibition on tying. No business purpose is served by engaging in these transactions and parties wishing to engage in these transactions should be able to negotiate the simultaneous release of storage capacity and assignment of inventory.

WHEREFORE, Atmos hereby respectfully requests that the Commission accept Atmos' comments on the Commission's NOPR for the promotion of a more efficient capacity release market as set forth herein.

This the 25th day of January, 2008.

Atmos Energy Corporation

/s/ Brian S. Heslin
Brian S. Heslin
Moore & Van Allen PLLC
100 North Tryon Street, Suite 4700
Charlotte, North Carolina 28202-4003
Telephone: 704-331-1090

¹ Releasing storage shippers should not be forced to sell their inventory below its average cost or to be forced to replace storage gas at premium market prices at the termination of a released transaction.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document is being served upon each person designated on the official service list compiled by the Secretary in this proceeding electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, to their last known address.

This the 25th day of January, 2008.

/s/ Becky A. Olsen
Becky A. Olsen

EXHIBIT 3

8-K 1 d8k.htm FORM 8-K

SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

Form 8-K

**Current Report Pursuant to Section 13 or
15(d) of the Securities Exchange Act of 1934**

December 13, 2007
Date of Report (Date of earliest event reported)

ATMOS ENERGY CORPORATION

(Exact Name of Registrant as Specified in its Charter)

TEXAS AND VIRGINIA
(State or Other Jurisdiction
of Incorporation)

1-10042
(Commission File Number)

75-1743247
(I.R.S. Employer
Identification No.)

**1800 THREE LINCOLN CENTRE,
5430 LBJ FREEWAY, DALLAS, TEXAS**
(Address of Principal Executive Offices)

75240
(Zip Code)

(972) 934-9227
(Registrant's Telephone Number, Including Area Code)

Not Applicable
(Former Name or Former Address, if Changed Since Last Report)

Check the appropriate box below if the Form 8-K filing is intended to simultaneously satisfy the filing obligation of the registrant under any of the following provisions:

- ☐ Written communications pursuant to Rule 425 under the Securities Act (17 CFR 230.425)
 - ☐ Soliciting material pursuant to Rule 14a-12 under the Exchange Act (17 CFR 240.14a-12)
 - ☐ Pre-commencement communications pursuant to Rule 14d-2(b) under the Exchange Act (17 CFR 240.14d-2(b))
 - ☐ Pre-commencement communications pursuant to Rule 13e-4(c) under the Exchange Act (17 CFR 240.13e-4(c))
-

Item 8.01. Other Events.

On December 13, 2007, Atmos Energy Corporation, our Mid-Tex Division, and our affiliate, Atmos Energy Marketing, LLC (together with its predecessor, Woodward Marketing, L.L.C.), received data requests from the Division of Investigations of the Office of Enforcement of the Federal Energy Regulatory Commission (the "Commission") in connection with its investigation into possible violations of the Commission's posting and competitive bidding regulations for pre-arranged released firm capacity on natural gas pipelines. The data requests include requests for information and documents concerning specified short-term capacity release transportation transactions involving these companies. We intend to respond to the data requests and fully cooperate with the Commission in its investigation.

SIGNATURE

Pursuant to the requirements of the Securities Exchange Act of 1934, the Registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

ATMOS ENERGY CORPORATION
(Registrant)

DATE: December 19, 2007

By: /s/ LOUIS P. GREGORY
Louis P. Gregory
Senior Vice President and General Counsel

3