

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

**IN RE: PETITION OF ATMOS ENERGY)
CORPORATION FOR APPROVAL OF) DOCKET NO. 08-00024
THE CONTRACT(S) REGARDING GAS)
COMMODITY REQUIREMENTS AND)
AND MANAGEMENT OR)
TRANSPORTATION STORAGE)
CONTRACTS)**

**FIRST DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE AND
PROTECTION DIVISION TO ATMOS ENERGY CORPORATION**

To: Atmos Energy Corporation
c/o William T. Ramsey
A. Scott Ross
Neal & Harwell PLC
One Nashville Place, Suite 2000
150 Fourth Avenue North
Nashville, Tennessee 37219

This Discovery Request is hereby served upon Atmos Energy Corporation ("AEC"), pursuant to Rules 26, 33 and 34 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg 1220-1-2-.11. We request that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate and Protection Division, 425 Fifth Avenue North, Nashville, Tennessee 37243, c/o Vance Broemel, on or before February 19, 2008.

PRELIMINARY MATTERS AND DEFINITIONS

Each discovery request calls for all knowledge, information and material available to AEC as a party, in particular, or knowledge, information or material possessed or available to AEC's attorney or other representative.

These discovery requests are to be considered continuing in nature, and are to be supplemented from time to time as information is received by AEC which would make a prior response inaccurate, incomplete, or incorrect. In addition, the Attorney General requests that AEC supplement responses hereto with respect to any question directly addressed to the identity and location of persons having knowledge of discoverable matters, and the identity of each person expected to be called as an expert at hearing, the subject matter on which the expert is expected to testify, and the substance of the expert's testimony.

These discovery requests are to be interpreted broadly to fulfill the benefit of full discovery. The singular of any discovery request includes the plural and the plural includes the singular. To assist you in providing full and complete discovery, the Attorney General provides the following definitional guidelines.

The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to include any information that might otherwise be construed outside the scope of these requests.

The term "communication" means any transmission of information by oral, graphic, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, or otherwise.

The term "person" or "persons" as used herein refers to any natural person, corporation, firm, company, sole proprietorship, partnership, business, unincorporated association, or other entity of any sort whatsoever. Where a company or organization is the party being served, all responses must include the company's response. Moreover, the company's designated person for responding must

assure that the company provides complete answers. *A complete answer must provide a response which includes all matters known or reasonably available to the company.*

The term “identity” and “identify” as used herein, with respect to any person, means to provide their name, date of birth, current residence address, current residence telephone number, current business address, current business telephone number, and the occupation or job title of that person; with respect to an entity, those terms mean to provide the name by which said entity is commonly known, the current address of its principal place of business, and the nature of business currently conducted by that entity; with respect to any document, those terms mean to provide the date of the document, the nature of the document, the title of the document, the reference number (if any) of the document, and the current location of the document, including the identity of the person or entity in possession of the document.

The term “document” as used herein, means any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, workpaper, spreadsheet, note, photograph, tape recording, computer disk or record, or other data compilation in any form without limitation. Produce the original and each copy, regardless of origin or location, of any book, pamphlet, periodical, letter, note, report, memorandum (including memoranda, note or report of a meeting or conversation), spreadsheet, photograph, videotape, audio tape, computer disk, e-mail, or any other written, typed, reported, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, which is in your possession, custody or control or which was, but is no longer, in your possession, custody, or control. If any such document was, but no longer is, in your possession or control, state

what disposition was made of it and when. If a document exists in different versions, including any dissimilar copies (such as a duplicate with handwritten notes on one copy), each version shall be treated as a different document and each must be identified and produced.

If you produce documents in response to these discovery requests, produce the original of each document or, in the alternative, produce a copy of each document and identify the location of the original document. If the “original” document is itself a copy, that copy should be produced as the original.

If any objections are raised on the basis of privilege or immunity, include in your response a complete explanation concerning the privilege asserted.

If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

If any of the interrogatories are not answered on the basis of privilege or immunity, include in your response to each such interrogatory a written statement evidencing:

- (a) the nature of the communication;
- (b) the date of the communication;
- (c) the identity of the persons present at such communication; and
- (d) a brief description of the communication sufficient to allow the Authority to rule on a motion to compel.

If, for any reason, you are unable to answer a discovery request fully, submit as much information as is available and explain why your answer is incomplete. If precise information cannot be supplied, submit; 1) your best estimate, so identified, and your basis for the estimate, and 2) such information available to you as comes closest to providing the information requested. If you have

reason to believe that other sources of more complete and accurate information exist, identify those sources.

If any information requested is not furnished as requested, state where and how the information may be obtained or extracted, the person or persons having knowledge of the procedure and the person instructing that the information be excluded.

I. FIRST DISCOVERY REQUESTS TO ATMOS ENERGY CORPORATION (“AEC”)

AEC1. Please provide all information and/or documents that Atmos has filed with the Tennessee Regulatory Authority (“TRA”) in support of its Motion for Approval of Contract Regarding Gas Commodity Requirements and Management of Transportation/Storage Contracts.

RESPONSE:

AEC2. Please provide all information and/or documents provided to the TRA staff or directors related to the Contract Regarding Gas Commodity Requirements and Management of Transportation/Storage Contracts, either formally or informally.

RESPONSE:

AEC3. Please provide any information and/or documents that Atmos provided to bidders in this case both before and after bids were submitted.

RESPONSE:

AEC4. Please provide a record and description of all communications that Atmos had with bidders in this case both before and after bids were submitted.

RESPONSE:

AEC5. Please state whether Atmos believes that any documents and/or information provided in responses to Requests 1-4 above, are confidential. If so, state which information is confidential and the reasons for that contention.

RESPONSE:

AEC6. Did Atmos ask Atmos Energy Marketing to submit its March 13, 2008, letter that is part of the record filed with the TRA in this Docket ? If so, please describe the communications between Atmos and Atmos Energy Marketing.

RESPONSE:

AEC7. 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:

AEC8. Please identify the name and location of all persons having knowledge of discoverable matters in this case.

RESPONSE:

AEC9. Please produce copies of all documents referred to or relied upon in responding to these discovery requests.

RESPONSE:

AEC10. 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:

AEC11. Please produce copies of all documents -- including, without limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information -- that you contend support the factual assertions, conclusions, or opinions of any of your witnesses in this matter and also all documents that contradict the factual assertions, conclusions, or opinions of any of your witnesses in this matter.

RESPONSE:

AEC12. Please produce copies of all documents -- including, without limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information -- relied upon by any of your witnesses in evaluating, reaching conclusions, or formulating an opinion in this matter.

RESPONSE:

AEC13. Please produce copies of all documents -- including, without limitation, workpapers, spreadsheets, summaries, charts, notes, and exhibits -- created by or for or prepared by or for any of your witnesses in evaluating, reaching conclusions, or formulating an opinion in this matter.

RESPONSE:

AEC14. Identify all information, documents and things filed in the present docket record, including all responses to discovery of the parties and data request from the TRA Staff, which CGC produced in this docket and does not agree to stipulate to the authenticity of such information, documents and things in this proceeding. For each separate piece of information, documents and things which CGC produced in this docket and CGC contends is not admissible as evidence describe in specific detail any objection(s) CGC claims as to admissibility into the evidentiary record in this docket.

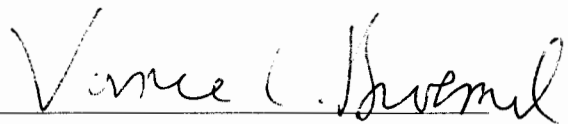
RESPONSE:

AEC15. Please provide all Excel files (or other data files) containing the information provided in response to these request items.

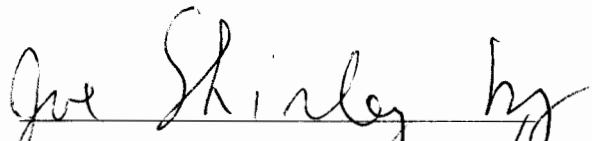
RESPONSE:

RESPECTFULLY SUBMITTED,

ROBERT E. COOPER, JR., B.P.R. #10934
Attorney General and Reporter
State of Tennessee



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Assistant Attorney General


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Office of the Attorney General
Consumer Advocate and Protection Division

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Dated: April 2nd, 2008

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:

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This the 2nd day of April, 2008.

Vance L. Broemel
Vance L. Broemel

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