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February 21, 2008

### VIA HAND DELIVERY

Eddie Roberson, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37219 filed electronically in docket office on 02/20/08

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 Response to Motion for Extension of

Time

Dear Chairman Roberson:

Enclosed you will find the original and four copies of Stand Energy Corporation's Response to the Motion of Atmos Energy Corporation for an Extension of Time to Respond to Stand Energy's Motion for a Stay. This filing has also been made electronically.

Please contact me if you need additional information.

Sincerely, D. Breeze Sandar

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(S) REGARDING GAS	)	
COMMODITY REQUIREMENTS AND	)	TRA Docket No. 08-00024
MANAGEMENT OF TRANSPORTATION	)	
STORAGE CONTRACTS	)	

## STAND ENERGY CORPORATION'S RESPONSE TO MOTION FOR EXTENSION OF TIME TO RESPOND

Comes now Stand Energy Corporation ("Stand Energy") and files this Response to Atmos Energy Corporation's ("AEC") Motion for Extension of Time to Respond to Stand Energy's Motion to Stay the Atmos Asset Management RFP and TRA Docket No. 08-00024. In support of Stand Energy's motion, Stand Energy respectfully states as follows:

AEC requests an extension until February 29 to respond to Stand Energy's motion to stay and further proposes that Stand Energy's motion be resolved during the March 10 or 24 TRA conference. February 29 is the date that proposals are due in response to AEC's RFP that is at issue. Although Stand Energy believes that it is appropriate to extend professional courtesy when appropriate, Stand Energy did not agree to AEC's motion because AEC failed to offer an alternative that would ameliorate the potential harm to Stand Energy. In light of the timing in the RFP and the nature and purpose of Stand Energy's motion, AEC's request will in certain respects result in a denial of Stand Energy's motion and negate its request for expedited treatment.

Based on these reasons, Stand Energy respectfully requests that the TRA either deny AEC's Motion for Extension of Time to Respond or grant an interim stay of the Atmos Asset

Management RFP and TRA Docket No. 08-00024 until such time that AEC has had an opportunity to respond and the TRA has made a ruling on Stand Energy's Motion to Stay.

Respectfully Submitted, Stand Energy Corporation

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 <u>20</u>, 2008.

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