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March 11, 2008

filed electronically in docket office 3/11/2008

Sharla Dillon, Docket Manager  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

**VIA HAND DELIVERY**

RE: Request of Atmos Energy Corporation for Approval of Contract(s) Regarding Gas  
Commodity Requirements, etc., TRA Docket No. 08-00024

Dear Ms. Dillon:

Enclosed please find Response of Atmos Energy Corporation to TRA Staff's March 6, 2008 Data Request. An electronic copy of the response is included in this e-mail. The original and four hard copies are being hand delivered to the Authority. Also by hand delivery we are providing the original and four copies of the referenced attachments, which are being filed **UNDER SEAL**, along with a CD containing the under seal documents in .pdf format.

If you have any questions regarding this matter, please do not hesitate to contact me.

Best regards.

Sincerely,

  
A. Scott Ross

ASR:prd

Enclosure

xc: Via E-Mail w/o Attachments:  
Timothy C. Phillips  
Henry M. Walker  
D. Billye Sanders  
John M. Dosker  
Patricia D. Childers  
Jeffrey Perryman

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

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

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**RESPONSE OF ATMOS ENERGY CORPORATION TO  
TRA STAFF'S MARCH 6, 2008 DATA REQUEST**

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Atmos Energy Corporation ("AEC") respectfully submits this response to the data requests submitted by TRA Staff, which were filed with the Authority on March 6, 2008. AEC respectfully responds as follows:

1. A list of the 21 companies that requested a copy of the RFP.

**RESPONSE:** AEC ultimately received a total of 25 requests for copies of the RFP in addition to the copies that were originally sent out. The additional companies that requested a copy of the RFP are listed below.

Vega Energy Partners, Ltd.  
PPL EnergyPlus, LLC  
Marathon Oil Company  
UBS Energy, LLC  
Baltimore Gas & Electric Company  
National Energy & Trade, LP  
Virginia Power Energy Marketing  
ConocoPhillips  
Enspire Energy, LLC  
UGI Energy Services  
SouthStar Energy  
SparkEnergy Gas

Chesapeake Energy Marketing, Inc.  
ArcLight Energy marketing  
DB Energy  
CIMA Energy  
Louis Dreyfus Energy Services  
Merrill Lynch Commodities  
BEAR Energy LP  
Hess Corporation  
Petrocom Ventures, Ltd.  
DTE Energy Trading  
Seminole  
ConAgra Trade Group, Inc.  
eServices, LLC

2. A copy of each bid received.

**RESPONSE:** Bids were received from NJR Energy, Sequent Energy, PPL EnergyPlus, and Atmos Energy Marketing. Copies of the bids are submitted herewith. These bid documents were submitted to AEC under a promise of confidentiality to the bidders, and must be filed under seal. A proposed Protective Order was submitted with the Petition in this matter, filed on February 7, 2008.

The following documents are responsive to this request. These documents are being filed under seal.

NJR Energy Area I Bid.pdf;  
NJR Energy Area II Bid.pdf;  
NJR Energy Combined Area Bid.pdf  
Sequent Energy Combined Area Bid.pdf  
AEM Area I Bid.pdf;  
AEM Area II Bid.pdf;  
AEM Combined Area Bid.pdf; and  
AEM Bid Intent 3-10-08.pdf.  
PPL EnergyPlus Area II Bid.pdf

3. A copy of AEC's current Gas Purchasing Agreement.

**RESPONSE:** The files listed below are produced in response to the request. These files are Confidential. They are being filed under seal.

AEM-ETN Nora Trans Confirmation.pdf ;  
Anadarko Trans Confirmations.pdf;  
Chevron Trans Confirm.pdf; and  
Oxy Trans Confirm.pdf.

4. In its RFP, AEC lists areas where the asset manager is required to supply transportation capacity for gas supply, exchange services, and storage injections and withdrawals. In the absence of an asset manager, does AEC have the capacity to transport gas to its customers and its storage facilities?

**RESPONSE:** In areas where AEC requests the asset manager to supply exchange services or a delivered service to its city gate, AEC does not hold capacity upstream of Atmos' citygates. In the absence of an asset manager supplying these services, AEC could either solicit a firm delivered service for necessary supply or pursue obtaining the capacity upstream. As evidenced by multiple responses from our most recent RFP, there are counterparties that are able to provide the necessary services. Also evidenced by the RFP responses, significant additional costs would be incurred by ratepayers by obtaining upstream capacity since the upstream transportation providers would require paying demand charges for upstream service all year round and respondents to the RFP were able to provide capacity seasonally.

Respectfully submitted,

**NEAL & HARWELL, PLC**

By: 

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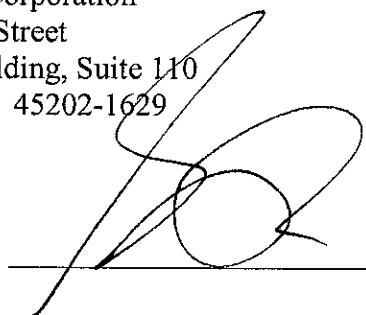
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*Counsel for Atmos Energy Corporation*

### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response only (not the attachments, which were filed under seal) has been served, via the method(s) indicated below, on the following counsel, this the 11<sup>th</sup> day of March, 2008.

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