

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

<b>IN RE:</b>	)	
	)	
<b>PETITION OF ATMOS ENERGY</b>	)	
<b>CORPORATION FOR APPROVAL OF</b>	)	
<b>TARIFF ESTABLISHING</b>	)	<b>DOCKET NO. 10-00199</b>
<b>ENVIRONMENTAL COST RECOVERY</b>	)	
<b>RIDER</b>	)	

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**PETITION TO INTERVENE**

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Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Regulatory Authority ("TRA" or "Authority") to grant the Consumer Advocate's intervention into this proceeding on behalf of the public interest, because consumers are being asked to pay approximately \$327,000 in additional environmental cleanup costs over the estimated amount of \$350,000 as set forth in Atmos Energy Corporation's ("Atmos") *Motion to Approve Revised Environmental Cost Recovery Tariff* in its *Petition for Approval of Tariff Establishing Environmental Cost Recovery Rider*, TRA Docket 10-00199. For cause, Petitioner would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utilities services by initiating and intervening as a party in proceedings before the Authority in accordance with the Uniform Administrative Procedures Act and Authority rules.

2. Atmos is a public utility regulated by the Authority and provides natural gas services to consumers located in the State of Tennessee.

3. On October 19, 2010, Atmos filed in the Authority a *Motion to Approve Revised Environmental Cost Recovery Tariff* in its *Petition for Approval of Tariff Establishing Environmental Cost Recovery Rider*, requesting approximately \$327,000 in additional environmental cleanup costs over the estimated \$350,000 amount, for a total cost of approximately \$677,000. Prior to filing this Motion, Atmos discussed this matter with the Consumer Advocate in order to expedite the process of reviewing the request by Atmos and determining what, if any action, will be taken by the Consumer Advocate. The Consumer Advocate appreciates this effort by Atmos and will evaluate the Motion as quickly as practicable.

4. Additional investigation and discovery may be needed to determine whether the proposed rate increase and charges sought by Atmos are appropriate and effective.


5. Only by participating in this proceeding can the Consumer Advocate work adequately to protect the interests of consumers.

WHEREFORE, Petitioner respectfully asks the Authority to grant the Petition to Intervene.

RESPECTFULLY SUBMITTED,



ROBERT E. COOPER, JR. (BPR #010934)  
Attorney General and Reporter  
State of Tennessee

  
VANCE L. BROEMEL (BPR #11421)  
Senior Counsel  
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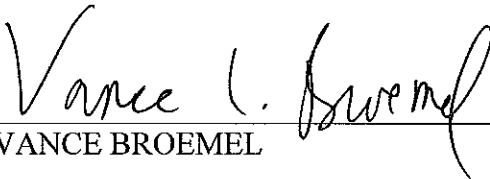
Dated: October 28, 2010.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail or electronic mail upon:

Scott Ross  
Neal & Harwell  
150 Fourth Avenue North,  
Suite 2000  
Nashville, TN 37219

This the 28<sup>th</sup> day of October, 2010.

  
VANCE BROEMEL