STATE OF TENNESSEE

Office of the Attorney General



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April 9, 2014

Hon. James M. Allison, Chairman Tennessee Regulatory Authority 502 Deadrick Street, 4th Floor Nashville, TN 37243

> In Re: Petition of Atmos Energy Corporation for Approval of Contract Meter Reading Heightened Procedures within the State of Tennessee, TRA Docket No. 14-00022

Dear Chairman Allison:

The Consumer Advocate and Protection Division ("Consumer Advocate") has reviewed the Petition of Atmos Energy Corporation for Approval of Contract Meter Reading Heightened Procedures within the State of Tennessee ("Petition") and Direct Testimony of Wayne Turner on Behalf of Atmos Energy ("Direct Testimony"), both filed on March 7, 2014, by Atmos Energy Corporation ("Atmos"). In the Petition, Atmos seeks the approval of heightened procedures for the renewed use of contract meter reading by Atmos in Tennessee, as required by the Order Approving Settlement Agreement ("Order") filed July 15, 2005 in TRA Docket No. 05-00150, and the Settlement Agreement ("Settlement Agreement") attached thereto. The Consumer Advocate also has reviewed the TRA Staff's First Data Request filed on March 19, 2014 and the Response of Atmos Energy Corporation to TRA Staff's First Data Request ("Atmos Response") filed on March 24, 2014.

In its review, the Consumer Advocate has compared the heightened meter reading procedures set out in the Order with the heightened procedures proposed by Atmos in the Petition and the Direct Testimony, as well as those specifically set out in the last paragraph of Atmos Response. Based on that comparison, the Consumer Chairman James M. Allison April 9, 2014 Page 2

Advocate is of the opinion that heightened procedures set out in the Petition, Direct Testimony, and Atmos Response, if complied with, would reflect the heightened procedures set out in and required by the Order.

The Consumer Advocate, therefore, respectfully expresses its intent not to intervene into this proceeding involving the approval of the contract meter reading heightened procedures within the State of Tennessee requested by Atmos in the Petition. The Consumer Advocate reserves its right to petition to intervene with respect to any proposed amendments or other relief that may be requested subsequent to the filing of this letter. The Consumer Advocate's opinion or expression of intent may not be used for any purpose other than the expression of intent not to intervene as stated herein.

The Consumer Advocate requests that this letter be filed in this docket.

Sincerely

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