

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

<b>IN RE:</b>	)	
	)	
<b>ATMOS ENERGY CORPORATION</b>	)	
<b>GENERAL RATE CASE AND</b>	)	<b>DOCKET NO. 14-00146</b>
<b>PETITION TO ADOPT ANNUAL</b>	)	
<b>REVIEW MECHANISM AND ARM</b>	)	
<b>TARIFF</b>	)	

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**MOTION FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY**

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The Consumer Advocate and Protection Division of the Office of the Attorney General (“Consumer Advocate”) respectfully petitions the Tennessee Regulatory Authority (“TRA” or “Authority”) for an order granting the Consumer Advocate leave to file the supplemental testimony of William H. Novak, attached hereto as Attachment A. This supplemental testimony would explain the prior Stipulation and Settlement Agreement (“Agreement”) between the Consumer Advocate and Atmos Energy Corporation (“Atmos”) in TRA Docket 12-00064 and support the Consumer Advocate’s position regarding accumulated deferred income taxes (“ADIT”) and net operating loss carryforwards (“NOLCs”) in this Docket 14-00146. For cause, Petitioner would show as follows:

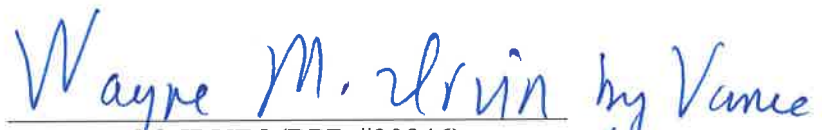
1. On June 22, 2012, Atmos filed a petition for a general rate case requesting a rate increase of \$10.8 million, which became TRA Docket 12-00064.
2. On July 11, 2012, the Consumer Advocate filed a Petition to Intervene in Docket 12-00064. Intervention was granted by Authority Order dated August 27, 2012, without objection. No other parties sought or were granted intervention.

3. Following multiple rounds of discovery, expert testimony, and extensive negotiations and discussions, Atmos and the Consumer Advocate entered into the Agreement, thereby resolving the issues in Docket 12-00064. The TRA approved the Agreement on December 4, 2012.

4. The Consumer Advocate now seeks leave to file the supplemental testimony of its expert witness William H. Novak attached to this Motion. Mr. Novak was the Consumer Advocate's expert witness in Docket 12-00064, and he has prefiled direct testimony on behalf of the Consumer Advocate in this Docket 14-00146. His supplemental testimony would explain the terms of the Agreement between the parties regarding ADIT and NOLCs and support the Consumer Advocate's position on ADIT and NOLCs in this Docket. This supplemental testimony is further necessitated by the inadequacy of certain responses by Atmos to discovery requests made by the Consumer Advocate.

WHEREFORE, Petitioner respectfully asks the Authority to grant this Motion for Leave to File Supplemental Testimony.

RESPECTFULLY SUBMITTED,

  
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Dated: April \_\_\_\_\_, 2015

CERTIFICATE OF SERVICE

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

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This the 21 day of April, 2015.

Wayne M. Irvin  
Wayne M. Irvin  
by Vance  
Hewitt