

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

IN RE:)
)
PETITION OF ATMOS ENERGY)
CORPORATION TO REVISE) **Docket No. 16-00028**
PERFORMANCE BASED)
RATEMAKING MECHANISM TARIFF)
)

**FIRST DISCOVERY REQUESTS OF ATMOS ENERGY CORPORATION TO
TENNESSEE REGULATORY AUTHORITY STAFF**

TO: Tennessee Regulatory Authority Staff

1. Produce all documents generated by each of your witnesses in this matter, including without limitation all notes, reports, correspondence, work-papers, spreadsheets, calculations and the like. The work-papers and calculations should be produced in Excel working format with numbers, formulas and linked files provided.

RESPONSE:

2. Produce all documents that have been referenced or relied upon by each of your witnesses in this matter.

RESPONSE:

3. Produce all hearing exhibits and other documents that you plan to introduce, use, or reference at the hearing on the merits in this matter.

RESPONSE:

4. For the purpose of stating its contentions in this proceeding, provide the specific language of all of TRA Staff's recommended amendments and revisions to the Company's proposed tariff in this matter. Produce a redlined copy of the Company's proposed tariff indicating all of Staff's proposed amendments and revisions.

RESPONSE:

5. Admit that, since at least September 2015, Atmos Energy, TRA Staff, and the CPAD have exchanged email correspondence including draft proposed tariffs and have had multiple in-person discussions concerning Atmos Energy's proposed Performance Based Ratemaking Tariff amendments.

RESPONSE:

6. Admit that TRA Staff had the opportunity to ask questions of the consultant (Exeter) and to provide feedback.

RESPONSE:

7. Admit that TRA Staff and the Company participated in multiple meetings and exchanged multiple drafts of proposed tariff language following Exeter's report.

RESPONSE:

Respectfully submitted,

NEAL & HARWELL, PLC



By:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served, via the method(s) indicated below, on the following counsel of record, this the 14th day of November, 2016.

<input type="checkbox"/> Hand	Wayne Irvin, Esq.
<input type="checkbox"/> Mail	Office of the Attorney General
<input type="checkbox"/> Fax	Consumer Protection and Advocate Division
<input type="checkbox"/> Fed. Ex.	P. O. Box 20207
<input checked="" type="checkbox"/> E-Mail	315 Deaderick Street, 20 th Floor Nashville, TN 37202
<input type="checkbox"/> Hand	Joe Shirley, Esq.
<input type="checkbox"/> Mail	Jim Layman, Esq.
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<input type="checkbox"/> Fed. Ex.	500 Deaderick Street, 4 th Floor
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