

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)	
)	
ATMOS ENERGY CORPORATION)	DOCKET NO. 18-00067
FOR APPROVAL OF ITS 2018 ANNUAL RATE)	
REVIEW FILING PURSUANT TO TENN.)	
CODE ANN. § 65-5-103(d)(6))	

PETITION TO INTERVENE

Herbert H. Slatery III, Attorney General and Reporter for the State of Tennessee, by and through the Consumer Protection and Advocate Division of the Office of the Attorney General (Consumer Advocate), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Public Utility Commission (TPUC or Commission) to grant the Consumer Advocate's intervention into this proceeding because consumers' interests, rights, duties or privileges may be determined or affected by the Petition of Atmos Energy Corporation for Approval of Its 2018 Annual Rate Review Filing Pursuant to Tenn. Code Ann. § 65-5-103(d)(6) (Petition) filed in TPUC Docket 18-00067. 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 utility services by initiating and intervening as a party in any matter or proceeding before the Commission in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. § 4-5-101 *et seq.*, and Commission rules.

2. Atmos Energy is a public utility regulated by the Commission and provides natural gas service to approximately 132,000 residential, commercial, and industrial customers in Tennessee.

3. The Utility's principal place of business is located at Atmos Energy Corporation, 5430 LBJ Freeway, Suite 1800, Dallas, Texas 75240.¹

4. Atmos Energy's Petition requests a decrease in rates to be paid by Atmos' customers in Tennessee in the amount of \$5,031,996.²

5. The interests of consumers, including without limitation the proposed adjustment in rates to be paid by consumers under the Petition, may be affected by determinations and orders made by the Commission with respect to (i) the interpretation, application, and/or implementation of Tenn. Code Ann. § 65-5-103(a), Tenn. Code Ann. § 65-5-103(d), and other relevant statutory and regulatory provisions, (ii) the review and analysis of the documentation, financial spreadsheets, and materials provided by Atmos Energy, and (iii) the interpretation, application, and/or implementation of the terms and conditions of the Commission's Orders in TPUC Docket Nos. 14-00146, 15-00089, 16-00013, 16-00105, 17-00012, and 17-00091 as well as the related settlement agreements as applicable in those Dockets.

6. Only by participating as a party to this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

Wherefore, the Consumer Advocate requests the Commission to grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,



HERBERT H. SLATTERY III (BPR No. 09077)
Attorney General and Reporter
State of Tennessee

¹ Petition of Atmos Energy Corporation for a General Rate Case and Petition to Adopt Annual Review Mechanism and ARM Tariff filed on November 25, 2014, in TPUC Docket No. 14-00146, page 2, paragraph 4.

² Pre-Filed Testimony of Gregory K. Waller on Behalf of Atmos Energy Corporation, filed in TPUC Docket No. 18-00067 on June 15, 2018, page 4.



WAYNE M. IRVIN (BPR No. 030946)
Assistant Attorney General
Office of the Tennessee Attorney General
Public Protection Section
Consumer Protection and Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Phone: (615) 532-5512
Facsimile: (615) 741-1076
wayne.irvin@ag.tn.gov

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:

A. Scott Ross, Esq.
Blind Akrawi, Esq.
Neal & Harwell, PLC
1201 Demonbreun Street, Suite 1000
Nashville, TN 37203
sross@nealharwell.com
bakrawi@nealharwell.com

Mr. Mark Martin
VP, Regulatory Affairs
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, KY 42303
(270) 685-8024
mark.martin@atmosenergy.com

Douglas C. Walther, Esq.
Associate General Counsel
Atmos Energy Corporation
P.O. Box 650205
Dallas, TX 75265-0205
doug.walther@atmosenergy.com

This the 8th day of August, 2018.



WAYNE M. IRVIN