BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of Atmos Energy |) |) | |
|--|---|---|-----------------------|
| Corporation's filing for Purchased Gas |) |) | Case No. GR-2006-0300 |
| Adjustment in the 2005-2006 period. | |) | |

STAFF'S RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its Recommendation in this Purchased Gas Adjustment case states:

- 1. The Procurement Analysis Department (Staff) has reviewed Atmos Energy Corporation's (Atmos or Company) 2005-2006 Actual Cost Adjustment (ACA) filings for the Company's three territories.
- 2. Staff' reviewed and evaluated the Company's billed revenues and its natural-gas costs for the period of September 1, 2005, to August 31, 2006, for Areas B, K and S, and June 1, 2005, to May 31, 2006, for Areas G, P and U. Staff also performed an examination of Atmos' gas purchasing practices to determine the prudence of the Company's purchasing decisions. Staff also conducted a hedging review to determine the reasonableness of the Company's hedging plans for this ACA period.
- 3. In addition to reviewing the Company's gas purchasing practices, Staff conducted a reliability analysis of the Company's estimated peak-day requirements and its pipeline capacity levels to meet customers' needs.
- 4. Staff's memorandum is organized into four sections. Each section begins with detailed explanations of Staff's concerns and recommendations. Each continues with a summary and concludes with a recommendation section.
 - 5. The Recommendation is being filed as Highly Confidential in its entirety until the

Company has had the opportunity to review the Memorandum and indicate what information it considers to be public and which is highly confidential. Staff expects to file a public version within seven days.

WHEREFORE Staff recommends the Commission issue its order directing the Company to respond to Staff's recommendations within 30 days.

Respectfully submitted,

/s/ Lera L. Shemwell

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 31st day of December, 2007.

/s/ Lera L. Shemwell