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OVERNIGHT DELIVERY

April 19, 2012

Jeff R. Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
PO Box 615
Frankfort, Kentucky 40602

RECEIVED

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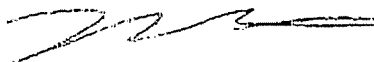
PUBLIC SERVICE
COMMISSION

**RE: Atmos Energy Corporation - Petition for Confidentiality and Motion
to Supplement Record - Case No. 2012-00110**

Dear Mr. Derouen:

I am enclosing herewith, an original, plus eleven (11) copies, of a Petition for Confidentiality. The original of the Petition contains **Confidential** information and is so marked. The eleven copies of the Petition have redacted copies attached. I am also enclosing, an original, plus eleven (11) copies of a Motion to Supplement Record. Please return one file stamped copy of the documents to me. Thanks.

Very truly yours,



Mark R. Hutchinson

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF ATMOS ENERGY CORPORATION
FOR CLARIFICATION OR ALTERNATIVELY
FOR MODIFICATION OF ITS APPROVED HEDGING PROGRAM

Case No. 2012-00110

PETITION FOR CONFIDENTIALITY

Atmos Energy Corporation ("Atmos Energy") respectfully petitions the Kentucky Public Service Commission ("Commission"), pursuant to 807 KAR 5:001 Section 7, and all other applicable law, for confidential treatment of the attached materials regarding its hedging program.

1. On March 8, 2012, Atmos Energy made a power point presentation to the Commission Staff concerning its hedging program which contained sensitive and confidential information about pricing and strategies. Atmos Energy has this day filed a Motion to Supplement the record with hard copies of the information contained in the power point presentation.

2. The attached seventeen (17) pages contain sensitive pricing information and confidential information about Atmos Energy's hedging strategies. Atmos Energy's hedging strategies (including the prices Atmos Energy would likely pay for hedging contracts under various market conditions) constitutes sensitive, proprietary information which if publicly disclosed could put Atmos Energy at a commercial disadvantage in future hedging negotiations. Prospective brokers of hedging devices would gain insight into how Atmos Energy is likely to react to changing market conditions in terms of what Atmos Energy might be willing to pay for hedging contracts. This information would not otherwise be available. Although the full extent to which Atmos Energy would be disadvantaged in future negotiations is difficult to predict, it is clear that Atmos Energy would likely be disadvantaged in future negotiations if the information contained in the attachments to this Petition is made public.

3. Atmos Energy would not, as a matter of company policy, disclose information like that

contained in the attachments to any person or entity, except as required by law or pursuant to a court order or subpoena. Atmos Energy's internal practices and policies are directed towards non-disclosure of the attached information. In fact, the information contained in the attached schedules is not disclosed to any personnel of Atmos Energy except those who need to know in order to discharge their responsibility. Atmos Energy has never disclosed such information publicly. This information is not customarily disclosed to the public and is generally recognized as confidential and proprietary in the industry. The Commission has historically granted Atmos Energy confidential protection to information concerning the actual price being paid by Atmos Energy to individual marketing companies and other suppliers of natural gas.

4. There is no significant interest in public disclosure of the information contained in the attached schedules. Any public interest in favor of disclosure of the information is out weighed by the competitive interest in keeping the information confidential.

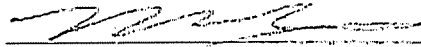
5. The information contained in the attached schedules is also entitled to confidential treatment because it constitutes a trade secret under the two prong test of KRS 265.880: (a) the economic value of the information is derived by not being readily ascertainable by other persons who might obtain economic value by its disclosure and (b) the information is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. The economic value of this information is derived by Atmos Energy maintaining the confidentiality of the information since prospective brokers could obtain economic value by its disclosure.

6. Pursuant to 807 KAR 5:001, Section 7 (3), temporary confidentiality of the attached schedules should be maintained until the Commission enters an order as to this Petition. Once the order regarding confidentiality has been issued, Atmos Energy would have twenty (20) days to seek alternative remedies pursuant to 807 KAR 5:0001, Section 7 (4).

7. In Atmos Energy's previous hedging cases, the Commission has granted confidential protection to the same type of information for which confidential protection is now requested.

WHEREFORE, Atmos Energy petitions the Commission to treat as confidential the attached schedules marked as "CONFIDENTIAL".

Respectfully submitted this 19 day of April, 2012.

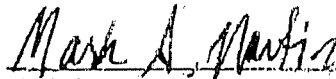


Mark R. Hutchinson
611 Frederica Street
Owensboro, Kentucky 42301

Douglas Walther
ATMOS ENERGY CORPORATION
PO Box 650250
Dallas, Texas 75265

VERIFICATION

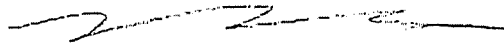
I, Mark A. Martin, being duly sworn under oath state that I am Vice President of Rates and Regulatory Affairs for Atmos Energy Corporation, Kentucky/Midstates Division, and that the statements contained in the foregoing Petition are true as I verily believe.



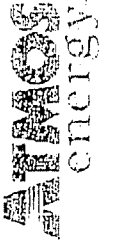
Mark A. Martin

CERTIFICATE OF SERVICE

I hereby certify that on the 19 day of April, 2012, the original of this Petition, with the Confidential Information for which confidential treatment is sought, together with ten (10) copies of the Petition without the confidential information, was faxed, and also overnighted, to the Kentucky Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40206, and to Larry Cook and Dennis Howard, Attorney General's Office, 1024 Capital Center Drive, Frankfort, Kentucky 40206.



Mark R. Hutchinson



**Atmos Kentucky
Gas Supply and Hedging
Update
March 8, 2012**

All information contained in this presentation is considered highly confidential

Atmos Kentucky Hedging Program



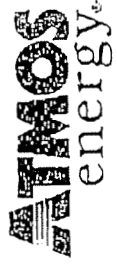
CONFIDENTIAL

U.S. Natural Gas Market Fundamentals

CONFIDENTIAL

U.S. Natural Gas Market Fundamentals

CONFIDENTIAL



NYMEX Winter Comparison

\$6.50

CONFIDENTIAL

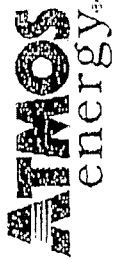
Atmos Kentucky Storage



CONFIDENTIAL

Atmos Kentucky Mark to Market

Cost of Historic Swap Program vs. Current Call Option Pricing



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Liberty Consulting Group



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Hedging Plan Results

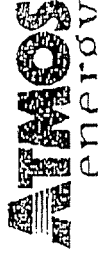
Nov 2011 – Mar 2012



CONFIDENTIAL

Hedging Plan Benchmark Results

Nov 2011 – Mar 2012



CONFIDENTIAL

Winter 2011-12 Volume by Counterparty



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Hedging Plan Results Nov 2012 – Mar 2013



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Hedging Plan Benchmark Results

Nov 2012 – Mar 2013



CONFIDENTIAL

**Hedging Plan Volume
Nov 2013 – Mar 2014**



CONFIDENTIAL

2012 Atmos Kentucky Forward Price Stabilization Program



CONFIDENTIAL

Next Steps



CONFIDENTIAL

PBR Benchmark
Atmos KY Tariff Page 34



CONFIDENTIAL

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF

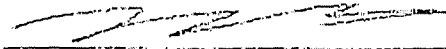
APPLICATION OF ATMOS ENERGY CORPORATION
FOR CLARIFICATION OR ALTERNATIVELY
FOR MODIFICATION OF ITS APPROVED HEDGING PROGRAM

Case No. 2012-00110

MOTION TO SUPPLEMENT RECORD

On March 8, 2012, Atmos Energy Corporation ("Atmos") made a power point presentation concerning its hedging program to the Commission Staff. The material contained in that presentation should be included as part of the record in this proceeding, albeit in confidential format. Atmos is accordingly filing with the Commission the material presented in the power point presentation in hard copy format and under a Petition for Confidentiality. Atmos requests the material be made part of the record.


Respectfully submitted this 19 day of April, 2012


Mark R. Hutchinson
611 Frederica Street
Owensboro, Kentucky 42301

Douglas Walther
ATMOS ENERGY CORPORATION
PO Box 650250
Dallas, Texas 75265

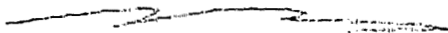
VERIFICATION

I, Mark A. Martin, being duly sworn under oath state that I am Vice President of Rates and Regulatory Affairs for Atmos Energy Corporation, Kentucky/Midstates Division, and that the statements contained in the foregoing Petition are true as I verily believe.


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Mark R. Hutchinson