



September 29, 2014

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

Re: Case No. 2014-00000

Dear Mr. Derouen:

We are filing the enclosed original and ten (10) copies of a notice under the provisions of our Gas Cost Adjustment Clause, Case No. 2013-0148. **This filing contains a Petition of Confidentiality and confidential documents.**

Please indicate receipt of this filing by stamping and dating this letter and returning a scanned copy by E-mail to Stellie.Jackson@atmosenergy.com.

If you have any questions, feel free to call me at 972-855-3077.

Sincerely,

A handwritten signature in cursive script that reads "Stellie Jackson".

Stellie S. Jackson
Rate Administration Analyst

Enclosures

RECEIVED

SEP 30 2014

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

RECEIVED

SEP 30 2014

PUBLIC SERVICE
COMMISSION

In the Matter of:

GAS COST ADJUSTMENT)
FILING OF)
ATMOS ENERGY CORPORATION)

Case No. 2014-00000

NOTICE

QUARTERLY FILING

For The Period

November 1, 2014 – January 31, 2015

Attorney for Applicant

Mark R. Hutchinson
611 Frederica Street
Owensboro, Kentucky 42301

September 29, 2014

Atmos Energy Corporation, ("the Company"), is duly qualified under the laws of the Commonwealth of Kentucky to do its business. The Company is an operating public utility engaged in the business of purchasing, transporting and distributing natural gas to residential, commercial and industrial users in western and central Kentucky. The Company's principal operating office and place of business is 3275 Highland Pointe Drive, Owensboro, Kentucky 42303. Correspondence and communications with respect to this notice should be directed to:

Mark A. Martin
Vice President of Rates & Regulatory Affairs
Kentucky/Mid-States Division
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, Kentucky 42303

Mark R. Hutchinson
Attorney for Applicant
611 Frederica Street
Owensboro, Kentucky 42301

Laura Brevard
Manager, Rate Administration
Atmos Energy Corporation
5430 LBJ Freeway, Suite 700
Dallas, Texas 75240

Stellie S. Jackson
Rate Administration Analyst
Atmos Energy Corporation
5430 LBJ Freeway, Suite 700
Dallas, Texas 75240

The Company gives notice to the Kentucky Public Service Commission, hereinafter "the Commission", pursuant to the Gas Cost Adjustment Clause contained in the Company's settlement gas rate schedules in Case No. 2013-00148.

The Company hereby files Second Revised Sheet No. 4, Second Revised Sheet No. 5, and Second Revised Sheet No. 6 to its PSC No. 2, Rates, Rules and Regulations for Furnishing Natural Gas to become effective November 1, 2014.

The Gas Cost Adjustment (GCA) for firm sales service is \$5.7369 per Mcf and \$4.5295 per Mcf for interruptible sales service. The supporting calculations for the Second Revised Sheet No. 5 are provided in the following Exhibits:

- Exhibit A – Comparison of Current and Previous Gas Cost Adjustment (GCA) Cases
- Exhibit B – Expected Gas Cost (EGC) Calculation
- Exhibit C - Rates used in the Expected Gas Cost (EGC)
- Exhibit D – Correction Factor (CF) Calculation
- Exhibit E – Refund Factor (RF) Calculation

Since the Company's last GCA filing, Case No. 2014-00212, the following changes have occurred in its pipeline and gas supply commodity rates for the GCA period.

1. The commodity rates per Mcf used are based on historical estimates and/or current data for the quarter of November 1, 2014 through January 31, 2015, as shown in Exhibit C, page 1 of 2.
2. The G-1 Expected Gas Cost will be approximately \$5.6921 per Mcf for the quarter of November 1, 2014 through January 31, 2015, as compared to \$6.5745 per Mcf used for the period of August 1, 2014 through October 31, 2014. The G-2 Expected Commodity Gas Cost will be approximately \$4.4847 for the quarter of November 1,

2014 through January 31, 2015 as compared to \$5.2882 for the period of August 1, 2014 through October 31, 2014.

3. The Company's notice sets out a new Correction Factor of \$(0.1381) per Mcf which will remain in effect until at least January 31, 2015. The new Correction factor includes the balance from Pipeline Refunds of \$6.19. This balance is due to adjustments to customers billed prior to the pipeline refund cutoff date (November 1, 2013).

4. The Company's notice also sets out a new Refund Factor of (\$0.0000) per Mcf which will remain in effect until at least January 31, 2015. The Company has refunded the original obligation to our customers for all pipeline refunds and therefore requests that the Refund Factor be set to zero.

The GCA tariff as approved in Case No. 92-558 provides for a Correction Factor (CF) which compensates for the difference between the expected gas cost and the actual gas cost for prior periods. A revision to the GCA tariff effective December 1, 2001, Filing No. T62-1253, provides that the Correction Factor be filed on a quarterly basis. In Case No. 2013-00148, effective January 24, 2014, the Company's GCA tariff allows recovery of any gas cost which is uncollectible, to be included in each February GCA filing.

The Company is filing its updated Correction Factor that is based upon the balance in the Company's 1910 Account as of July 31, 2014 (August, 2014 general ledger). The calculation for the Correction Factor is shown on Exhibit D, Page 1 of 6. Also beginning with the February, 2011 GCA filing in compliance with tariff page 16 from the Rate Case

filing (Case No. 2013-00148) the Company is allowed to recover the net uncollectible gas cost (net uncollectible gas cost less subsequently collected gas cost).

WHEREFORE, Atmos Energy Corporation requests this Commission, pursuant to the Commission's order in Case No. 99-070, to approve the Gas Cost Adjustment (GCA) as filed in Second Revised Sheet No. 5; and Second Revised Sheet No. 6 setting out the General Transportation Tariff Rate T-3 and T-4 for each respective sales rate for meter readings made on and after November 1, 2014.

DATED at Dallas, Texas this 29th Day of September, 2014.

ATMOS ENERGY CORPORATION

By: Stellie S. Jackson

Stellie S. Jackson
Rate Administration Analyst
Atmos Energy Corporation

ATMOS ENERGY CORPORATION
NAME OF UTILITY

Current Rate Summary
Case No. 2014-00000

Firm Service

Base Charge:

Residential (G-1)	-	\$16.00	per meter per month
Non-Residential (G-1)	-	40.00	per meter per month
Transportation (T-4)	-	350.00	per delivery point per month
Transportation Administration Fee	-	50.00	per customer per meter

Rate per Mcf²

			<u>Sales (G-1)</u>		<u>Transportation (T-4)</u>	
First	300	¹ Mcf	@ 7.0549	per Mcf	@ 1.3180	per Mcf (R, -)
Next	14,700	¹ Mcf	@ 6.6169	per Mcf	@ 0.8800	per Mcf (R, -)
Over	15,000	Mcf	@ 6.3569	per Mcf	@ 0.6200	per Mcf (R, -)

Interruptible Service

Base Charge	-	\$350.00	per delivery point per month
Transportation Administration Fee	-	50.00	per customer per meter

Rate per Mcf²

			<u>Sales (G-2)</u>		<u>Transportation (T-3)</u>	
First	15,000	¹ Mcf	@ 5.3195	per Mcf	@ 0.7900	per Mcf (R, -)
Over	15,000	Mcf	@ 5.0595	per Mcf	@ 0.5300	per Mcf (R, -)

¹ All gas consumed by the customer (sales, transportation; firm and interruptible) will be considered for the purpose of determining whether the volume requirement of 15,000 Mcf has been achieved.

² DSM, PRP and R&D Riders may also apply, where applicable.

DATE OF ISSUE September 29, 2014
MONTH / DATE / YEAR

DATE EFFECTIVE November 1, 2014
MONTH / DATE / YEAR

ISSUED BY /s/ Mark A. Martin
SIGNATURE OF OFFICER

TITLE Vice President – Rates & Regulatory Affairs

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO 2014-00000 DATED N/A

FOR ENTIRE SERVICE AREA

P.S.C. KY NO. 2

SECOND REVISED SHEET NO. 5

CANCELLING

FIRST REVISED SHEET NO. 5

ATMOS ENERGY CORPORATION
NAME OF UTILITY

Current Gas Cost Adjustments

Case No. 2014-00000

Applicable

For all Mcf billed under General Sales Service (G-1) and Interruptible Sales Service (G-2).

Gas Charge = GCA

GCA = EGC + CF + RF + PBRRF

<u>Gas Cost Adjustment Components</u>	<u>G - 1</u>	<u>G-2</u>	
EGC (Expected Gas Cost Component)	5.6921	4.4847	(R, R)
CF (Correction Factor)	(0.1381)	(0.1381)	(R, R)
RF (Refund Adjustment)	0.0000	0.0000	(-, -)
PBRRF (Performance Based Rate Recovery Factor)	<u>0.1829</u>	<u>0.1829</u>	(R, R)
GCA (Gas Cost Adjustment)	<u><u>\$5.7369</u></u>	<u><u>\$4.5295</u></u>	(R, R)

DATE OF ISSUE September 29, 2014
MONTH / DATE / YEAR

DATE EFFECTIVE November 1, 2014
MONTH / DATE / YEAR

ISSUED BY /s/ Mark A. Martin
SIGNATURE OF OFFICER

TITLE Vice President – Rates & Regulatory Affairs

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO 2014-00000 DATED N/A

FOR ENTIRE SERVICE AREA

P.S.C. KY NO. 2

SECOND REVISED SHEET NO. 6

CANCELLING

FIRST REVISED SHEET NO. 6

ATMOS ENERGY CORPORATION
NAME OF UTILITY

Current Transportation

Case No. 2014-00000

The Transportation Rates (T-3 and T-4) for each respective service net monthly rate is as follows:

System Lost and Unaccounted gas percentage: 1.16%

				<u>Simple Margin</u>	<u>Non- Commodity</u>	<u>Gross Margin</u>	
Transportation Service ¹							
Firm Service (T-4)							
First	300	Mcf	@	\$1.3180 +	\$0.0000 =	\$1.3180 per Mcf	(-)
Next	14,700	Mcf	@	0.8800 +	0.0000 =	0.8800 per Mcf	(-)
All over	15,000	Mcf	@	0.6200 +	0.0000 =	0.6200 per Mcf	(-)
Interruptible Service (T-3)							
First	15,000	Mcf	@	\$0.7900 +	\$0.0000 =	\$0.7900 per Mcf	(-)
All over	15,000	Mcf	@	0.5300 +	0.0000 =	0.5300 per Mcf	(-)

¹ Excludes standby sales service.

DATE OF ISSUE September 29, 2014
MONTH / DATE / YEAR

DATE EFFECTIVE November 1, 2014
MONTH / DATE / YEAR

ISSUED BY /s/ Mark A. Martin
SIGNATURE OF OFFICER

TITLE Vice President – Rates & Regulatory Affairs

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO 2014-00000 DATED N/A

Line No.	Description	Case No.		Difference
		(a) 2014-00212	(b) 2014-00000	
		\$/Mcf	\$/Mcf	\$/Mcf
1	<u>G - 1</u>			
2				
3	<u>Distribution Charge (per Case No. 2013-00148)</u>			
4	First 300 Mcf	1.3180	1.3180	0.0000
5	Next 14,700 Mcf	0.8800	0.8800	0.0000
6	Over 15,000 Mcf	0.6200	0.6200	0.0000
7				
8	<u>Gas Cost Adjustment Components</u>			
9	EGC (Expected Gas Cost):			
10	Commodity	5.0663	4.2663	(0.8000)
11	Demand	1.5082	1.4258	(0.0824)
12	Total EGC	6.5745	5.6921	(0.8824)
13	CF (Correction Factor)	(0.0982)	(0.1381)	(0.0399)
14	RF (Refund Adjustment)	0.0000	0.0000	0.0000
15	PBRRF (Performance Based Rate Recovery Factor)	0.1936	0.1829	(0.0107)
16	GCA (Gas Cost Adjustment)	6.6699	5.7369	(0.9330)
17				
18	<u>Rate per Mcf (GCA included)</u>			
19	First 300 Mcf	7.9879	7.0549	(0.9330)
20	Next 14,700 Mcf	7.5499	6.6169	(0.9330)
21	Over 15,000 Mcf	7.2899	6.3569	(0.9330)
22				
23				
24	<u>G - 2</u>			
25				
26	<u>Distribution Charge (per Case No. 2013-00148)</u>			
27	First 15,000 Mcf	0.7900	0.7900	0.0000
28	Over 15,000 Mcf	0.5300	0.5300	0.0000
29				
30	<u>Gas Cost Adjustment Components</u>			
31	EGC (Expected Gas Cost):			
32	Commodity	5.0663	4.2663	(0.8000)
33	Demand	0.2219	0.2184	(0.0035)
34	Total EGC	5.2882	4.4847	(0.8035)
35	CF (Correction Factor)	(0.0982)	(0.1381)	(0.0399)
36	RF (Refund Adjustment)	0.0000	0.0000	0.0000
37	PBRRF (Performance Based Rate Recovery Factor)	0.1936	0.1829	(0.0107)
38	GCA (Gas Cost Adjustment)	5.3836	4.5295	(0.8541)
39				
40	<u>Rate per Mcf (GCA included)</u>			
41	First 300 Mcf	6.1736	5.3195	(0.8541)
42	Over 14,700 Mcf	5.9136	5.0595	(0.8541)
43				
44				
45	<u>Refund Factor (RF)</u>			
47		Effective		
48		Date	RF	
49				
50	1 - 2013-00484	2/1/2014	0.0000	
51	2 - 2014-00114	5/1/2014	0.0000	
52	3 - 2014-00212	8/1/2014	0.0000	
53	4 - 2014-00000	11/1/2014	0.0000	
54				
55	Total Refund Factor (RF)		\$0.0000	

Line No.	Description	(a)	(b)	(c)
		Case No.		Difference
		2014-00212	2014-00000	
		\$/Mcf	\$/Mcf	\$/Mcf
1	<u>T -4 Transportation Service / Firm Service (High Priority)</u>			
2				
3	<u>Simple Margin / Distribution Charge (per Case No. 2013-00148)</u>			
4	First 300 Mcf	1.3180	1.3180	0.0000
5	Next 14,700 Mcf	0.8800	0.8800	0.0000
6	Over 15,000 Mcf	0.6200	0.6200	0.0000
7				
8				
9	<u>T - 3 / Interruptible Service (Low Priority)</u>			
10				
11	<u>Simple Margin / Distribution Charge (per Case No. 2013-00148)</u>			
12	First 15,000 Mcf	0.7900	0.7900	0.0000
13	Over 15,000 Mcf	0.5300	0.5300	0.0000
14				

Line No.	Description	(a) Tariff Sheet No.	(b) Annual Units MMbtu	(c) Rate \$/MMbtu	(d) (e) Non-Commodity	
					Total \$	Demand \$
1	<u>SL to Zone 2</u>					
2	NNS Contract #	29760	12,340,360			
3	Base Rate	Section 4.4 - NNS		0.3088	3,810,703	3,810,703
4						
5	Total SL to Zone 2		<u>12,340,360</u>		<u>3,810,703</u>	<u>3,810,703</u>
6						
7	<u>SL to Zone 3</u>					
8	NNS Contract #	29762	27,776,588			
9	Base Rate	Section 4.4 - NNS		0.3543	9,841,245	9,841,245
10						
11	FT Contract #	29759	4,927,500			
12	Base Rate	Section 4.1 - FT		0.2939	1,448,192	1,448,192
13						
14	Total SL to Zone 3		<u>32,704,088</u>		<u>11,289,437</u>	<u>11,289,437</u>
15						
16	<u>Zone 1 to Zone 3</u>					
17	FT Contract #	29761	1,093,740			
18	Base Rate	Section 4.1 - FT		0.2616	286,122	286,122
19						
20	Total Zone 1 to Zone 3		<u>1,093,740</u>		<u>286,122</u>	<u>286,122</u>
21						
22	<u>SL to Zone 4</u>					
23	NNS Contract #	29763	3,320,769			
24	Base Rate	Section 4.4 - NNS		0.4190	1,391,402	1,391,402
25						
26	FT Contract #	29765	1,277,500			
27	Base Rate	Section 4.1 - FT		0.3670	468,843	468,843
28						
29	FT Contract #	31097	547,500			
30	Base Rate	Section 4.1 - FT		0.3670	200,933	200,933
31						
32	Total SL to Zone 4		<u>5,145,769</u>		<u>2,061,178</u>	<u>2,061,178</u>
33						
34	<u>Zone 2 to Zone 4</u>					
35	FT Contract #	32799	2,309,720			
36	Base Rate	Section 4.1 - FT		0.2780	642,102	642,102
37						
38	Total Zone 2 to Zone 4		<u>2,309,720</u>		<u>642,102</u>	<u>642,102</u>
39						
40	Total SL to Zone 2		12,340,360		3,810,703	3,810,703
41	Total SL to Zone 3		32,704,088		11,289,437	11,289,437
42	Total Zone 1 to Zone 3		1,093,740		286,122	286,122
43	Total SL to Zone 4		5,145,769		2,061,178	2,061,178
44	Total Zone 2 to Zone 4		2,309,720		642,102	642,102
45						
46	Total Texas Gas		<u>53,593,677</u>		<u>18,089,542</u>	<u>18,089,542</u>
47						
48						
49	Total Texas Gas Area Non-Commodity				<u>18,089,542</u>	<u>18,089,542</u>

Atmos Energy Corporation
 Expected Gas Cost (EGC) Calculation
 Tennessee Gas Pipeline - Non-Commodity

Line No. Description	(a)	(b)	(c)	(d) (e) Non-Commodity	
	Tariff Sheet No.	Annual Units MMbtu	Rate \$/MMbtu	Total \$	Demand \$
1 0 to Zone 2					
2 FT-G Contract # 2546		145,000			
3 Base Rate	23		16.0575	2,328,338	2,328,338
4					
5 FT-A Contract # 95033		144,000			
6 Base Rate	14		16.0575	2,312,280	2,312,280
7					
8 Total Zone 0 to 2		<u>289,000</u>		<u>4,640,618</u>	<u>4,640,618</u>
9					
10 Gas Storage					
11 Production Area:					
12 Demand	61	34,968	2.8100	98,260	98,260
13 Space Charge	61	4,916,148	0.0286	140,602	140,602
14 Market Area:					
15 Demand	61	237,408	1.5400	365,608	365,608
16 Space Charge	61	10,846,308	0.0211	228,857	228,857
17 Total Storage		<u>16,034,832</u>		<u>833,327</u>	<u>833,327</u>
18					
19 Total Tennessee Gas Area FT-G Non-Commodity				<u>5,473,945</u>	<u>5,473,945</u>

Atmos Energy Corporation
 Expected Gas Cost (EGC) Calculation
 Texas Gas Transmission - Commodity Purchases

Line No.	Description	(a)	(b)	(c)	(d)	(e)	(f)	
		Tariff Sheet No.			Purchases	Rate	Total	
					Mcf	MMbtu	\$/MMbtu	\$
1	<u>No Notice Service</u>					1,389,050		
2	Indexed Gas Cost						4.0650	5,646,488
3	Commodity (Zone 3)	Section 4.4 - NNS					0.0490	68,063
4	Fuel and Loss Retention @	Section 4.18.1	2.71%				0.1132	157,240
5							4.2272	5,871,791
6								
7	<u>Firm Transportation</u>					1,136,495		
8	Indexed Gas Cost						4.0650	4,619,852
9	Base (Weighted on MDQs)						0.0443	50,347
10	ACA	Section 4.1 - FT					0.0014	1,591
11	Fuel and Loss Retention @	Section 4.18.1	2.71%				0.1132	128,651
12							4.2239	4,800,441
13	<u>No Notice Storage</u>							
14	Net (Injections)/Withdrawals							
15	Withdrawals					1,828,677	3.9900	7,296,421
16	Injections					0	4.0650	0
17	Commodity (Zone 3)	Section 4.4 - NNS					0.0490	89,605
18	Fuel and Loss Retention @	Section 4.18.1	2.71%				0.1132	207,006
19						1,828,677	4.1522	7,593,032
20								
21								
22	Total Purchases in Texas Area					4,354,222	4.1948	18,265,264
23								
24								
25	<u>Used to allocate transportation non-commodity</u>							
26								
27					Annualized		Commodity	
28					MDQs in		Charge	Weighted
29	<u>Texas Gas</u>				MMbtu	Allocation	\$/MMbtu	Average
30	SL to Zone 2	Section 4.1 - FT			12,340,360	23.03%	\$0.0399	\$ 0.0092
31	SL to Zone 3	Section 4.1 - FT			32,704,088	61.02%	0.0445	\$ 0.0272
32	1 to Zone 3	Section 4.1 - FT			1,093,740	2.04%	0.0422	\$ 0.0009
33	SL to Zone 4	Section 4.1 - FT			5,145,769	9.60%	0.0528	\$ 0.0051
34	2 to Zone 4	Section 4.1 - FT			2,309,720	4.31%	0.0446	\$ 0.0019
35	Total				53,593,677	100.0%		\$ 0.0443
36								
37	<u>Tennessee Gas</u>							
38	0 to Zone 2	24			289,000	100.00%	\$0.0177	\$ 0.0177
39	1 to Zone 2	24			0	0.00%	0.0147	-
40	Total				289,000	100.00%		\$ 0.0177

Atmos Energy Corporation
 Expected Gas Cost (EGC) Calculation
 Tennessee Gas Pipeline - Commodity Purchases

Line No.	Description	(a) Tariff Sheet No.	(b)	(c) Purchases		(e) Rate	(f) Total
				Mcf	MMbtu	\$/MMbtu	\$
1	<u>FT-A and FT-G</u>				355,564		
2	Indexed Gas Cost					4.0650	1,445,368
3	Base Commodity (Weighted on MDQs)					0.0177	6,293
4	ACA	24				0.0014	498
5	Fuel and Loss Retention	32	2.08%			0.0863	30,685
6						4.1704	1,482,844
7							
8	<u>FT-GS</u>				0		
9	Indexed Gas Cost					4.0650	0
10	Base Rate	26				0.8976	0
11	ACA	24				0.0014	0
12	Fuel and Loss Retention	32	2.08%			0.0863	0
13						5.0503	0
14							
15	<u>Gas Storage</u>						
16	FT-A & FT-G Market Area Withdrawals				701,319	3.9900	2,798,263
17	FT-A & FT-G Market Area Injections				0	4.0650	0
18	Withdrawal Rate	61				0.0087	6,101
19	Injection Rate	61				0.0087	0
20	Fuel and Loss Retention	61	1.07%			0.0001	70
21	Total				701,319	3.9988	2,804,434
22							
23							
24							
25	Total Tennessee Gas Zones				1,056,883	4.0565	4,287,278

Commodity	(a)	(b)	(c)	(d)	(e)	(f)
Line No.	Description	Tariff Sheet No.		Purchases Mcf	Rate MMbtu \$/MMbtu	Total \$
1	<u>Firm Transportation</u>					
2	Expected Volumes			338,000		
3	Indexed Gas Cost				4.0650	1,373,970
4	Base Commodity	10			0.0051	1,724
5	ACA	10			0.0014	473
6	Fuel and Loss Retention	10	0.88%		0.0320	10,816
7					<u>4.1035</u>	<u>1,386,983</u>
8						
9						

Non-Commodity

Line No.	Description	Tariff Sheet No.	Annual Units MMbtu	Non-Commodity		
				Rate \$/MMbtu	Total \$	Demand \$
	Injections					
10	FT-G Contract # 014573		33,750			
11	Discount Rate on MDQs			5.3776	181,494	181,494
12						
13	Total Trunkline Area Non-Commodity				<u>181,494</u>	<u>181,494</u>

Atmos Energy Corporation
 Expected Gas Cost (EGC) Calculation
 Demand Charge Calculation

Line No.	(a)	(b)	(c)	(d)	(e)
1	<u>Total Demand Cost:</u>				
2	Texas Gas Transmission	\$18,089,542			
3	Midwestern	0			
4	Tennessee Gas Pipeline	5,473,945			
5	Trunkline Gas Company	181,494			
6	Total	<u>\$23,744,981</u>			
7					
8					
9	<u>Demand Cost Allocation:</u>	Factors	Allocated Demand	Related Volumes	<u>Monthly Demand Charge</u> Firm Interruptible
10	All	0.1550	\$3,680,472	16,849,112	0.2184 0.2184
11	Firm	0.8450	20,064,509	16,617,444	1.2074
12	Total	1.0000	<u>\$23,744,981</u>		<u>1.4258 0.2184</u>
13					
14					
15		Annualized	Volumetric Basis for		
16		Mcf @14.65	Monthly	Demand Charge	
17	<u>Firm Service</u>		All	Firm	
18	Sales:				
19	G-1	16,617,444	16,617,444	16,617,444	1.4258
20					
21	<u>Interruptible Service</u>				
22	Sales:				
23	G-2	231,668	231,668		1.4258 0.2184
24					
25	<u>Transportation Service</u>				
26	T-3 & T-4	28,656,251			
27					
28		<u>45,505,363</u>	<u>16,849,112</u>	<u>16,617,444</u>	

	(a)	(b)	(c)	(d)
Line				
No. Description	Purchases		Rate	Total
	Mcf	MMbtu	\$/Mcf	\$
1 <u>Texas Gas Area</u>				
2 No Notice Service	1,378,436	1,389,050	4.2597	5,871,791
3 Firm Transportation	1,127,811	1,136,495	4.2564	4,800,441
4 No Notice Storage	1,814,704	1,828,677	4.1842	7,593,032
5 Total Texas Gas Area	4,320,951	4,354,222	4.2271	18,265,264
6				
7 <u>Tennessee Gas Area</u>				
8 FT-A and FT-G	335,438	355,564	4.4206	1,482,844
9 FT-GS	0	0	0.0000	0
10 Gas Storage				
11 Injections	0	0	0.0000	0
12 Withdrawals	661,622	701,319	4.2387	2,804,434
13	997,060	1,056,883	4.2999	4,287,278
14 <u>Trunkline Gas Area</u>				
15 Firm Transportation	313,835	338,000	4.4195	1,386,983
16				
17 <u>Company Owned Storage</u>				
18 Injections	2,795,432	2,815,000	4.0650	11,607,192
19 Withdrawals	0	0		0
20 Net WKG Storage	2,795,432	2,815,000	4.1522	11,607,192
21				
22				
23 Local Production	68,872	72,729	4.0650	279,965
24				
25				
26				
27 Total Commodity Purchases	8,496,150	8,636,834	4.2168	35,826,682
28				
29 Lost & Unaccounted for @	1.16%	98,555	100,187	
30				
31 Total Deliveries	8,397,595	8,536,647	4.2663	35,826,682
32				
33				
34				
35 Total Expected Commodity Cost	8,397,595	8,536,647	4.2663	35,826,682
36				
37				
38 Note: Column (c) is calculated by dividing column (d) by column (a)				
39				

Line No.	Description	MCF
	<u>Annualized Volumes Subject to Demand Charges</u>	
1	Sales Volume	16,849,112
2	Transportation	<u>0</u>
3	Total Mcf Billed Demand Charges	16,849,112
4	Divided by: Days/Year	<u>365</u>
5	Average Daily Sales and Transport Volumes	<u><u>46,162</u></u>
6		
7	<u>Peak Day Sales and Transportation Volume</u>	
8	Estimated total company firm requirements for 5 degree average	
9	temperature days from Peak Day Book - with adjustments per rate filing	<u><u>297,787</u></u> Mcf/Peak Day
10		
11		
12	New Load Factor (line 5 / line 9)	0.1550

Atmos Energy Corporation
Basis for Indexed Gas Cost
For the Quarter ending January 31, 2015

The projected commodity price was provided by the Gas Supply Department and was based upon the following:

- A. The Gas Supply Department reviewed the NYMEX futures close prices for the quarter of November 2014 through January 2015 during the period September 09 through September 22, 2014.

		Nov-14 (\$/MMBTU)	Dec-14 (\$/MMBTU)	Jan-15 (\$/MMBTU)
Tuesday	09/09/14	4.035	4.110	4.173
Wednesday	09/10/14	4.005	4.086	4.149
Thursday	09/11/14	3.873	3.959	4.027
Friday	09/12/14	3.910	3.991	4.059
Monday	09/15/14	3.997	4.085	4.149
Tuesday	09/16/14	4.063	4.157	4.222
Wednesday	09/17/14	4.077	4.163	4.229
Thursday	09/18/14	3.975	4.057	4.126
Friday	09/19/14	3.903	3.992	4.063
Monday	09/22/14	3.908	3.994	4.068
Average		<u>\$3.975</u>	<u>\$4.059</u>	<u>\$4.127</u>

- B. The Company believes prices are decreasing and prices for the quarter ending January 31, 2015 will settle at \$4.065 per MMBTU (based on the average of the past ten days) for the period that the GCA is to become effective.

In support of Item B, a worksheet entitled "Estimated Weighted Average Cost of Gas" has been filed under a Petition for Confidentiality in this Case.

Atmos Energy Corporation
Estimated Weighted Average Cost of Gas
For the Quarter ending January 31, 2015

	<u>November-14</u>			<u>December-14</u>			<u>January-15</u>			<u>Total</u>		
	<u>Volumes</u>	<u>Rate</u>	<u>Value</u>	<u>Volumes</u>	<u>Rate</u>	<u>Value</u>	<u>Volumes</u>	<u>Rate</u>	<u>Value</u>	<u>Volumes</u>	<u>Rate</u>	<u>Value</u>
Texas Gas												
Trunkline												
Tennessee Gas												
TX Gas Storage												
TN Gas Storage												
WKG Storage												
Midwestern												

(This information has been filed under a Petition for Confidentiality)

WACOGs

Line No.	(a) Month	(b) Actual Purchased Volume (Mcf)	(c) Recoverable Gas Cost	(d) Actual GCA Recovered Gas Cost	(e) Under (Over) Recovery Amount	(f) Adjustments	(g) Total
1	May-14	540,882	\$3,211,407.75	\$4,470,088.47	(\$1,258,680.72)	\$0.00	(\$1,258,680.72)
2							
3	June-14	442,352	\$2,414,566.55	\$2,271,588.01	\$142,978.54	\$0.00	\$142,978.54
4							
5	July-14	414,716	\$4,040,869.77	\$2,818,048.16	\$1,222,821.61	\$0.00	\$1,222,821.61
6							
7	Total Gas Cost						
8	Under/(Over) Recovery		<u>\$9,666,844.07</u>	<u>\$9,559,724.64</u>	<u>\$107,119.43</u>	<u>\$0.00</u>	<u>\$107,119.43</u>
9							
10	PBR Savings reflected in Gas Costs		<u>\$942,148.10</u>				
11							
12	<u>Correction Factor - Part 1</u>						
13	(Over)/Under Recovered Gas Cost through April 2014 (May 2014 GL)					(1,954,737.49)	
14	Total Gas Cost Under/(Over) Recovery for the three months ended July 2014					107,119.43	
15	Recovery from outstanding Correction Factor (CF)					(870,074.98)	
16	Over-Refunded Amount of Pipeline Refunds					6.19	
17	(Over)/Under Recovered Gas Cost through July 2014 (August 2014 GL) (a)					<u>(\$2,717,686.85)</u>	
18	Divided By: Total Expected Customer Sales (b)					16,849,112	Mcf
19							
20	Correction Factor - Part 1					(\$0.1613)	/ Mcf
21							
22	<u>Correction Factor - Part 2</u>						
23	Net Uncollectible Gas Cost through February 2014 (c)					390,400.78	
24	Divided By: Total Expected Customer Sales (b)					16,849,112	
25							
26	Correction Factor - Part 2					<u>\$0.0232</u>	/ Mcf
27							
28	<u>Correction Factor - Total (CF)</u>						
29	Total Deferred Balance through July 2014 (August 2014 GL) including Net Uncol Gas Cost					<u>(\$2,327,286.07)</u>	
30	Divided By: Total Expected Customer Sales (b)					16,849,112	
31							
32	Correction Factor - Total (CF)					<u>(\$0.1381)</u>	/ Mcf
33							

Atmos Energy Corporation
Recoverable Gas Cost Calculation
For the Three Months Ended July 2014
2014-00000

Line No.	Description	GL Unit	June-14	July-14	August-14
			(a)	(b)	(c)
			May-14	Month June-14	July-14
1	Supply Volume				
2	Pipelines:				
3	Texas Gas Transmission ¹	Mcf	0	0	0
4	Tennessee Gas Pipeline ¹	Mcf	0	0	0
5	Trunkline Gas Company ¹	Mcf	0	0	0
6	Midwestern Pipeline ¹	Mcf	0	0	0
7	Total Pipeline Supply	Mcf	0	0	0
8	Total Other Suppliers	Mcf	1,844,716	1,879,894	1,811,337
9	Off System Storage				
10	Texas Gas Transmission	Mcf	0	0	0
11	Tennessee Gas Pipeline	Mcf	0	0	0
12	System Storage				
13	Withdrawals	Mcf	8,766	0	0
14	Injections	Mcf	(827,104)	(893,489)	(870,011)
15	Producers	Mcf	3,617	3,010	2,921
16	Third Party Reimbursements	Mcf	(14)	(101)	(180)
17	Pipeline Imbalances cashed out	Mcf			
18	System Imbalances ²	Mcf	(489,099)	(546,963)	(529,351)
19	Total Supply	Mcf	540,882	442,352	414,716
20					
21	Change in Unbilled	Mcf			
22	Company Use	Mcf	0	0	0
23	Unaccounted For	Mcf	0	0	0
24	Total Purchases	Mcf	540,882	442,352	414,716

¹ Includes settlement of historical imbalances and prepaid items.

² Includes Texas Gas No-Notice Service volumes and monthly imbalances related to transportation customer activities.

Atmos Energy Corporation
Recoverable Gas Cost Calculation
For the Three Months Ended July 2014
2014-00000

Line No.	Description	GL Unit	June-14	July-14	August-14
			(a)	(b)	(c)
			Month		
			May-14	June-14	July-14
1	Supply Cost				
2	Pipelines:				
3	Texas Gas Transmission ¹	\$	1,241,243	1,213,005	1,241,661
4	Tennessee Gas Pipeline ¹	\$	251,196	242,145	241,500
5	Trunkline Gas Company ¹	\$	6,875	6,653	6,876
6	Twin Eagle Resource Management	\$			
7	Midwestern Pipeline ¹	\$			
8	Total Pipeline Supply	\$	<u>1,499,315</u>	<u>1,461,803</u>	<u>1,490,037.73</u>
9	Total Other Suppliers	\$	8,749,912	8,571,575	7,872,259
10	Hedging Settlements	\$	0		0
11	Off System Storage				
12	Texas Gas Transmission	\$			
13	Tennessee Gas Pipeline	\$			
14	WKG Storage	\$	122,500	122,500	122,500
15	System Storage				
16	Withdrawals	\$	41,807	0	0
17	Injections	\$	(3,953,951)	(4,116,713)	(3,719,274)
18	Producers	\$	16,523	13,886	16,022
19	Third Party Reimbursements	\$	(128)	(691)	(1,417)
20	Pipeline Imbalances cashed out	\$			
21	System Imbalances ²	\$	<u>(3,264,570)</u>	<u>(3,637,794)</u>	<u>(1,739,258)</u>
22	Sub-Total	\$	<u>3,211,408</u>	<u>2,414,567</u>	<u>4,040,870</u>
23	Pipeline Refund + Interest				
24	Change in Unbilled	\$			
25	Company Use	\$	0	0	0
26	Recovered thru Transportation	\$	0	0	0
27	Total Recoverable Gas Cost	\$	<u><u>3,211,407.75</u></u>	<u><u>2,414,566.55</u></u>	<u><u>4,040,869.77</u></u>

¹ Includes demand charges, cost of settlement of historical imbalances and prepaid items.

² Includes Texas Gas No-Notice Service volumes and monthly imbalances related to transportation customer activities.

Line No.	Month	Type of Sales	(a) Mcf Sold	(b) CF Rate	(c) CF Amounts	(d) RF Rate	(e) RF Amounts	(f) PBR Rate	(g) PBRRF Amounts	(h) GCA Rate	(i) GCA Recovery Amounts	(j) Total Recoveries	
1	May-14	G-1 Sales	687,817.220	\$0.5893	\$405,330.69	\$0.0000	\$0.00	\$0.1936	\$133,161.41	\$6.2694	\$4,312,201.28	\$4,850,693.38	
2		G-2 Sales	9,133.893	\$0.5893	5,382.60	\$0.0000	0.00	\$0.1936	1,768.32	\$4.9842	45,525.15	\$52,676.07	
3		Sub Total	696,951.113		\$410,713.29		\$0.00		\$134,929.73		\$4,357,726.43	\$4,903,369.45	
7		Timing: Cycle Billing and PPA's	0.000		(1,619.81)		(0.92)		4,823.80		112,362.04	\$115,565.11	
8		Total	696,951.113		\$409,093.48		(\$0.92)		\$139,753.53		\$4,470,088.47	\$5,018,934.56	\$4,879,181.95
1	June-14	G-1 Sales	347,532.551	\$0.5893	\$204,800.93	\$0.0000	\$0.00	\$0.1936	\$67,282.30	\$6.2694	\$2,178,820.58	\$2,450,903.81	
2		G-2 Sales	9,293.224	\$0.5893	5,476.50	\$0.0000	0.00	\$0.1936	1,799.17	\$4.9842	46,319.29	\$53,594.96	
6		Sub Total	356,825.775		\$210,277.43		\$0.00		\$69,081.47		\$2,225,139.87	\$2,504,498.77	
7		Timing: Cycle Billing and PPA's	0.000		1,766.98		0.39		1,610.42		46,448.14	\$49,825.93	
8		Total	356,825.775		\$212,044.41		\$0.39		\$70,691.89		\$2,271,588.01	\$2,554,324.70	\$2,483,632.42
21	July-14	G-1 Sales	418,627.390	\$0.5893	\$246,697.12	\$0.0000	\$0.00	\$0.1936	\$81,046.26	\$6.2694	\$2,624,542.56	\$2,952,285.94	
22		G-2 Sales	4,622.880	\$0.5893	2,724.26	\$0.0000	0.00	\$0.1936	894.99	\$4.9842	23,041.36	\$26,660.61	
26		Sub Total	423,250.270		\$249,421.38		\$0.00		\$81,941.25		\$2,647,583.92	\$2,978,946.55	
27		Timing: Cycle Billing and PPA's	0.000		(484.29)		(4.03)		5,925.31		170,464.24	\$175,901.23	
28		Total	423,250.270		\$248,937.09		(\$4.03)		\$87,866.56		\$2,818,048.16	\$3,154,847.78	\$3,066,985.25
31	Total Recovery from Correction Factor (CF)				<u>\$870,074.98</u>								
32	Total Amount Refunded through the Refund Factor (RF)						<u>(\$4.56)</u>						
33	Total Recovery from Performance Based Rate Recovery Factor (PBRRF)								<u>\$298,311.98</u>				
34	Total Recoveries from Expected Gas Cost (EGC) Factor										<u>\$9,559,724.64</u>		
35	Total Recoveries from Gas Cost Adjustment Factor (GCA)											<u>\$10,728,107.04</u>	

NOTE: The cycle billing is a result of customers being billed by the meter read date.
 The prior period adjustments (PPA's) consist of billing revisions/adjustments.

Description	May, 2014		June, 2014		July, 2014	
	MCF	Cost	MCF	Cost	MCF	Cost
1 Texas Gas Pipeline Area						
2 LG&E Natural						
3 Texaco Gas Marketing						
4 CMS						
5 WESCO						
6 Southern Energy Company						
7 Union Pacific Fuels						
8 Atmos Energy Marketing, LLC						
9 Engage						
10 ERI						
11 Prepaid						
12 Reservation						
13 Hedging Costs - All Zones						
14						
15 Total	1,673,847	\$7,878,847.26	1,647,953	\$7,435,953.66	1,601,310	\$6,885,952.05
16						
17						
18 Tennessee Gas Pipeline Area						
19 Chevron Natural Gas, Inc.						
20 Twin Eagle Resource Management						
21 WESCO						
22 Prepaid						
23 Reservation						
24 Fuel Adjustment						
25						
26 Total	0	\$0.00	0	\$0.00	0	\$0.00
27						
28						
29 Trunkline Gas Company						
30 Atmos Energy Marketing, LLC						
31 Engage						
32 Prepaid						
33 Reservation						
34 Fuel Adjustment						
35						
36 Total	170,716	\$870,335.34	229,943	\$1,126,326.56	208,618	\$980,570.85
37						
38						
39 Midwestern Pipeline						
40 Atmos Energy Marketing, LLC						
41 Midwestern Gas Transmission						
42 Anadarko						
43 Prepaid						
44 Reservation						
45 Fuel Adjustment						
46						
47 Total	153	\$729.66	1,998	\$9,580.98	1,409	\$6,038.85
48						
49						
50 ANR Pipeline						
51 Atmos Energy Marketing, LLC						
52 LG&E Natural						
53 Anadarko						
54 Prepaid						
55 Reservation						
56 Fuel Adjustment						
57						
58 Total	0	\$0.00	0	(\$285.80)	0	(\$302.41)
59						
60						
61 All Zones						
62 Total	1,844,716	\$8,749,912.26	1,879,894	\$8,571,575.40	1,811,337	\$7,872,259.34
63						
64						
65						

**** Detail of Volumes and Prices Has Been Filed Under Petition for Confidentiality ****

Atmos Energy Corporation

Net Uncollectible Gas Cost

Twelve Months Ended November, 2013

Exhibit D

Page 6 of 6

Line No.	Month (a)	Gas Cost Written Off (b)	Margin Written Off (c)	Taxes & Other Written Off (d)	Total Written Off (e)	Gas Cost Collected (f)	Margin Collected (g)	Net Uncollectible Gas Cost (h)	Cumulative Net Uncollectible Gas Cost (i)
1	Dec-12	(\$8,388.74)	(\$22,887.13)	(\$1,357.22)	(\$32,633.09)	\$14,116.34	\$14,989.80	(\$5,727.60)	(\$5,727.60)
2	Jan-13	(\$5,330.64)	(\$17,980.76)	(\$978.98)	(\$24,290.38)	\$11,135.83	\$10,855.59	(\$5,805.19)	(\$11,532.79)
3	Feb-13	(\$5,093.90)	(\$18,257.24)	(\$1,233.07)	(\$24,584.21)	\$11,336.14	\$11,478.03	(\$6,242.24)	(\$17,775.03)
4	Mar-13	(\$10,562.46)	(\$19,040.50)	(\$1,410.35)	(\$31,013.31)	\$4,076.96	\$4,879.28	\$6,485.50	(\$11,289.53)
5	Apr-13	(\$13,756.00)	(\$17,115.34)	(\$1,422.78)	(\$32,294.12)	\$4,206.45	\$5,026.09	\$9,549.55	(\$1,739.98)
6	May-13	(\$551.15)	(\$1,561.71)	(\$76.90)	(\$2,189.76)	\$7,606.84	\$25,908.27	(\$7,055.69)	(\$8,795.67)
7	Jun-13	(\$1,852.39)	(\$3,925.81)	(\$22.64)	(\$5,859.41)	\$4,818.81	\$2,325.85	(\$2,966.42)	(\$11,762.09)
8	Jul-13	(\$1,035.11)	(\$1,368.55)	\$53.83	(\$2,375.27)	\$6,751.68	\$1,835.15	(\$5,716.57)	(\$17,478.66)
9	Aug-13	(\$87.28)	(\$4,329.62)	\$88.44	(\$4,303.02)	\$4,913.31	\$4,350.04	(\$4,826.03)	(\$22,304.69)
10	Sep-13	(\$253,074.66)	(\$167,058.03)	(\$20,647.94)	(\$440,782.77)	\$5,048.13	\$4,415.35	\$248,026.53	\$225,721.84
11	Oct-13	\$2,157.89	(\$340.78)	\$115.17	\$1,932.28	\$25,260.20	\$18,365.20	(\$27,418.09)	\$198,303.75
12	Nov-13	(\$211,270.38)	(\$193,976.84)	(\$18,262.70)	(\$423,509.92)	\$19,173.35	\$17,326.33	\$192,097.03	\$390,400.78

Line No.	Amounts Reported:				AMOUNT
1	Tennessee Gas Pipeline PCB/HSL Refund, Docket Nos. RP91-203 & RP92-132				
2	Tennessee Gas Pipeline Rate Case Refund, Docket No. RP11-1566				
3	Carryover from Case No. 2013-00000				0.00
4	Less: amount related to specific end users				0.00
5	Amount to flow-through				\$ -
6					
7	Average of the 3-Month Commercial Paper Rates for the immediately				0.00%
8	preceding 12-month period less 1/2 of 1% to cover the costs of refunding.				
9					
10					
11	Allocation	(1)	(2)	(3)	
12		Demand	Commodity	Total	
13	Balance to be Refunded	\$0	\$ -	\$0	
14		0	0	0	
15					
16	Total (w/o interest)	0	0	0	
17	Interest (Line 14 x Line 5)	0	0	0	
18	Total	\$0	\$0	\$0	
19					
20	Refund Calculation				
21					
22	Demand Allocator - All				
23	(See Exh. B, p. 8, line 12)	0.1488			
24	Demand Allocator - Firm				
25	(1 - Demand Allocator - All)	0.8512			
26	Firm Volumes (normalized)				
27	(See Exh. B, p. 6, col. 3, line 28)	15,713,255			
28	All Volumes (excluding Transportation)				
29	(See Exh. B, p. 6, col. 2, line 28)	15,925,100			
30					
31	Demand Factor - All	\$0	\$0.0000 / MCF		
32	Demand Factor - Firm	\$0	\$0.0000 / MCF		
33	Commodity Factor	\$0	\$ - / MCF		
34	Total Demand Firm Factor				
35	(Col. 2, lines 29 - 30)				\$0.0000 / MCF
36	Total Demand Interruptible Factor				
37	(Col. 2, line 29)				\$0.0000 / MCF
38	Total Firm Sales Factor				
39	(Col. 2, line 31 + col. 1, line 33)				\$ - / MCF

COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

RECEIVED

SEP 30 2014

PUBLIC SERVICE
COMMISSION

In the Matter of:

GAS COST ADJUSTMENT)	CASE NO.
FILING OF)	2014-00000
ATMOS ENERGY CORPORATION)	

PETITION FOR CONFIDENTIALITY OF INFORMATION
BEING FILED WITH THE KENTUCKY PUBLIC SERVICE COMMISSION

Atmos Energy Corporation ("Atmos") 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 information which is described below and which is attached hereto. In support of this Petition, Atmos states as follows:

1. Atmos is filing its Gas Cost Adjustment ("GCA") for the quarterly period commencing on November 1, 2014 through January 31, 2015. This GCA filing contains a change to Atmos' Correction Factor (CF) as well as information pertaining to Atmos' projected gas prices. The following two attachments contain information which requires confidential treatment.

- a. The attached Exhibit D, Page 5 of 6 contains confidential information from which the actual price being paid by Atmos for natural gas to its supplier can be determined.
- b. The attached Weighted Average Cost of Gas ("WACOG") schedule in support of Exhibit C, Page 2 of 2 contains confidential information pertaining to prices projected to be paid by Atmos for purchase contracts.

2. Information of the type described above has previously been filed by Atmos with the Commission under petitions for confidentiality. The Commission has consistently granted confidential protection to that type of information in each of the prior GCA filings in KPSC Case No. 1999-070. The information contained in the attached WACOG schedule has also been filed with the Commission under a Petition for Confidentiality in Case No. 97-513.

3. All of the information sought to be protected herein as confidential, if publicly disclosed, would have serious adverse consequences to Atmos and its customers. Public disclosure of this information would impose an unfair commercial disadvantage on Atmos. Atmos has successfully negotiated an extremely advantageous gas supply contract that is very beneficial to Atmos and its ratepayers. Detailed information concerning that contract, including commodity costs, demand and transportation charges, reservations fees, etc. on specifically identified pipelines, if made available to Atmos' competitors, (including specifically non-regulated gas marketers), would clearly put Atmos to an unfair commercial disadvantage. Those competitors for gas supply would be able to gain information that is otherwise confidential about Atmos' gas purchases and transportation costs and strategies. The Commission has accordingly granted confidential protection to such information.

4. Likewise, the information contained in the WACOG schedule in support of Exhibit C, Page 2 of 2, also constitutes sensitive, proprietary information which if publicly disclosed would put Atmos to an unfair commercial disadvantage in future negotiations.

5. Atmos would not, as a matter of company policy, disclose any of the information for which confidential protection is sought herein to any person or entity, except as required by law or pursuant to a court order or subpoena. Atmos' internal practices and policies are directed

towards non-disclosure of the attached information. In fact, the information contained in the attached report is not disclosed to any personnel of Atmos except those who need to know in order to discharge their responsibility. Atmos 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.

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

7. The attached information 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 as 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 the information is derived by Atmos maintaining the confidentiality of the information since competitors and entities with whom Atmos transacts business could obtain economic value by its disclosure.

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

WHEREFORE, Atmos petitions the Commission to treat as confidential all of the material and information which is included in the attached one volume marked "Confidential".

Respectfully submitted this 15th day of September, 2014.



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