

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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OCT 13 2016

In the Matter of:

APPLICATION OF WKG STORAGE, INC.)
FOR RATE ADJUSTMENT FOR SMALL) Case No. 2016-00053
UTILITIES PURSUANT TO 807 KAR 5:076)

PUBLIC SERVICE
COMMISSION

**JOINT MOTION OF ATMOS ENERGY CORPORATION
AND WKG STORAGE, INC FOR REHEARING**

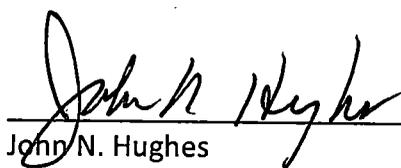
Atmos Energy Corporation ("Atmos") and WKG Storage, Inc. (WKG) (jointly referred to as Movants), by counsel, pursuant to KRS 278.400 move for a rehearing to correct the rates granted WKG.

In support of this motion, Movants state that that the Order dated September 30, 2016 does not apply AEC's discount prior to developing the rates listed in Exhibit A. Therefore, the charges listed in the Commission's order result in WKG over-collecting its cost of service by approximately \$105,193. The correct rates should be:

Storage Transportation (TS-1) Injection	\$0.1498
Storage Transportation (TS-1) Withdrawal	\$0.1498
Storage Service (s-1) Reservation	\$0.0749

The attached exhibit provides the calculations and the verification of the corrected rates.

For these reasons, Movants request that the Order of September 30, 2016 be modified to reflect the correct rates to generate the revenue requirement allowed of \$522,707.00.



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And



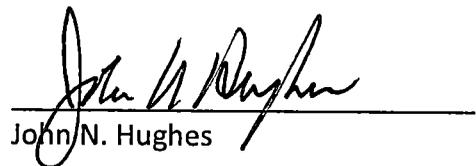
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CERTIFICATE OF SERVICE AND FILING

Counsel certifies that an original and ten copies of the foregoing were served and filed by hand delivery to the Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage prepaid to:

Kent Chandler
Attorney General
2015 Capital Center Dr.
Frankfort, KY 40601

This 13th day of October, 2016.



John N. Hughes

WKG STORAGE, INC.
RATE COMPARISON / PROOF OF REVENUES
TEST YEAR ENDING DECEMBER 31, 2015

Line No.	Description	Current Rate	Approved Rate			
	(a)	(b)	(c)			
1	Firm Transportation Rates (\$/1000 cubic feet)					
2	Storage Transportation (TS-1) Injection	\$0.1500	\$0.1498			
3	Storage Transportation (TS-1) - Withdrawal	\$0.1500	\$0.1498			
4	Storage Service (S-1) - Reservation	\$0.0500	\$0.0749			
		Capacity	Proposed Rate		Months	Revenue
		(b)	(c)	(d)	(e)	(f)
5	Proof of Revenue - Approved Rates:					
6	TS-1 Rate - Injection	1,750,000	\$0.1498			\$262,150
7	TS-1 Rate - Withdrawal	1,750,000	\$0.1498			262,150
8	Total TS-1					<u>\$524,300</u>
9	S-1 Storage Reservation	1,750,000	\$0.0749		12	1,572,900
10	Annual Demand Charge					<u>\$2,097,200</u>
11	Monthly Demand Charge					174,767
12	Proof of Revenue - Existing Rates:					
13	TS-1 Rate - Injection	1,750,000	\$0.1500			262,500
14	TS-1 Rate - Withdrawal	1,750,000	\$0.1500			262,500
15	Total TS-1					<u>\$525,000</u>
16	S-1 Storage Reservation	1,750,000	\$0.0500		12	1,050,000
17	Annual Demand Charge					<u>\$1,575,000</u>
18	Monthly Demand Charge					131,250
19	Annual Increase (Line 10 less Line 17)					<u>\$522,200</u>
20	Rounding					507
21	Per Ordering Paragraph #4 (Line 19 plus line 20)					<u>\$522,707</u>