COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

	In	the	Matter	of:
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THE APPLICATION OF ATMOS ENERGY)
CORPORATION, FOR AN ORDER)
AUTHORIZING THE IMPLEMENTATION OF A) CASE NO.
\$600 MILLION THREE-YEAR REVOLVING) 2005-00287
CREDIT FACILITY)

FIRST DATA REQUEST OF COMMISSION STAFF TO ATMOS ENERGY CORPORATION

Atmos Energy Corporation ("Atmos"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 6 copies of the following information, with a copy to all parties of record. The information requested herein is due not later than 10 days from the date of this request. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

- 1. Refer to page 1 of the application. Atmos states that the credit facility will serve primarily as a liquidity backstop for its \$600 million commercial paper program, although it will also be used for direct borrowings.
- a. Describe the commercial paper program and how this facility will function as a backstop.

- b. Provide the percentage of the credit facility that Atmos anticipates will be used for the commercial paper program.
- c. Atmos states that the interest rate on any direct borrowings will be a floating rate determined by a spread over either the London Interbank Offered Rate ("LIBOR") or an alternative rate such as the Prime Rate or the Federal Funds Rate. Explain who will decide whether to use LIBOR or another rate and how the decision will be made.
- d. What is typically the difference in rate between LIBOR and the Prime and Federal Funds rate?
- 2. Refer to page 2 of the application. Atmos states that it will use the net proceeds from the credit facility to repay all or a portion of its short-term debt, for the purchase, acquisition, construction or improvement of additional or existing properties, and for general corporate purposes.
- a. Provide a list of the short-term debt that Atmos anticipates it will repay from the proceeds of this credit facility.
- b. Provide a list of the properties that Atmos anticipates it will purchase, acquire, construct or improve from the proceeds of this credit facility.
- c. Provide a list of the general corporate purposes for which Atmos will use its credit facility.

Beth O'Donnell
Executive Director

Public Service Commission

P. O. Box 615

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DATED <u>August 1, 2005</u>

cc: All Parties