

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF ATMOS ENERGY	)	
CORPORATION FOR AN ORDER AUTHORIZING	)	CASE NO. 2006-00387
THE IMPLEMENTATION OF A \$900,000,000	)	
UNIVERSAL SHELF REGISTRATION	)	

FIRST DATA REQUEST OF COMMISSION STAFF  
TO ATMOS ENERGY CORPORATION

Atmos Energy Corporation ("Atmos") is requested, pursuant to 807 KAR 5:001, to file with the Commission the original and 5 copies of the following information, with a copy to all parties of record. The information requested herein is due by October 2, 2006. Each copy of the data requested should be placed in a bound volume with each item tabbed. 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 requested has been provided previously in the format requested, reference may be made to the specific location of that information in responding to this information request.

1. Refer to the Application, page 2. Concerning the hybrid securities:
  - a. Provide a detailed description of the nature and characteristics of the hybrid securities.
  - b. Is Atmos aware of any other regulated gas utilities that have issued hybrid securities? If yes, provide a list of those regulated gas utilities.

c. Provide a copy of the prospectus for a proposed issuance of hybrid securities.

2. Compare and contrast hybrid securities with other forms of debt financing. This comparison should include, but not be limited to, the interest rate options available, the actual interest rates carried for the instruments, and the tax deductibility of the interest expense. In addition, rank from least costly to most costly other forms of debt financing and hybrid securities.

3. Compare and contrast hybrid securities with other forms of equity financing. This comparison should include, but not be limited to, time to maturity, deferred interest payments, subordination status, and the existence of discounts and premiums on the issuance. In addition, rank from least costly to most costly other forms of equity financing and hybrid securities.

4. Does Atmos anticipate that any of the hybrid securities would be issued to any financing affiliates, financing subsidiaries, or financing operating companies of Atmos? If yes, provide a detailed explanation of how the transaction would be accomplished, including a discussion of how the funds would be provided by the affiliate, subsidiary, or operating company.

5. Refer to Application, page 2, paragraph 4, which mentions a debt to capitalization ratio target range of 50-55 percent. Explain how hybrid securities would be categorized in relation to that target range.



Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED: September 18, 2006  
cc: All Parties