

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)
ATMOS ENERGY CORPORATION) CASE NO.
FOR PRP RIDER RATES) 2017-00308

ATTORNEY GENERAL’S DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Data Requests to Atmos Energy Corporation [hereinafter “Atmos” or “Company”] to be answered by Atmos upon its ability to do so, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person’s knowledge, information, and belief formed after a reasonable inquiry.
- (6) If you believe any request appears confusing, request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words “document” or “documents” are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or

compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

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ATTORNEY GENERAL



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1. To answer the following requests, refer to Case No. 2009-00354, In the Matter of: Rate Application of Atmos Energy Corporation.
 - a. Refer to the Application, Volume 1 of 6, Direct Testimony of Earnest B. Napier, P.E., page 12-13.
 - i. Of the approximately 250 miles of bare steel mains Atmos proposed to replace, how much has Atmos replaced to date? In response to this request, please provide the month and year in which the most recent figure is available.
 - ii. Does Atmos still intend to replace all of the approximately 250 miles of bare steel mains on its system? If not, why not?
 - iii. By what date does Atmos intend to replace all of the bare steel mains and appurtenances?
 - iv. How does the date provided in response to request iii, above, compare to the planned 15-year period provided for on page 13 of Mr. Napier's testimony?
 - b. Refer to the Application, Volume 1 of 6, Direct Testimony of Earnest B. Napier, P.E., page 13.
 - i. To date, what is the total cost of the Pipeline Replacement Program?
 - ii. What is the estimated total cost of the program from now until expected completion?
 - iii. How does the total cost to date, and the expected cost from now until expected completion compare with the estimate of \$124 million provided for on page 13 of Mr. Napier's testimony?
 - iv. Provide the annual capital investment amounts for each year to date for the PRP and the estimated capital investment amounts for each year from now until expected completion.
 - c. Have additional types or families of pipe, or segments thereof, been added to the Pipeline Replacement program?
 - i. If so, provide the types of pipe, how many miles of each additional type were added, and at what cost, both to date and the estimated amount going forward.
 - ii. If additional types or families of pipe have been added to the PRP, did the Commission explicitly approve such additions?
 - iii. If additional types or families of pipe have been added to the PRP, on what basis were they added? (i.e. risk, leakage).
 - iv. Provide all criteria relied upon in determining whether to add additional types or families of pipe.
 - v. If Atmos has added only certain segments of additional types or families of pipe to be replaced, identify all criteria relied upon in

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determining whether to replace those segments (i.e., replacing them in the ordinary course of business, or replacing only those segments known to have leaks or suspected of leaking).

- d. Does Atmos still expect to complete replacement of the facilities within the original fifteen (15) year estimate?
 - i. If not, why not?