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PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF ATMOS ENERGY CORPORATION FOR AN ADJUSTMENT OF GAS RATES	) CASE NO. 2006-00464

ATTORNEY GENERAL'S SUPPLEMENTAL REQUEST FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Supplemental Request for Information to Atmos Energy Corporation, to be answered by the date specified in the Commission's Order of Procedure, 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) Please identify the witness who will be prepared to answer questions concerning each request.

(3) 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.

(4) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(5) 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.

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

(7) If Atmos objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) 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.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please 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.

(10) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.

Respectfully submitted,
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ATTORNEY GENERAL

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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the Attorney General's Supplemental Requests For Information were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served by mailing a true and correct copy of the same, first class postage prepaid, to:

Hon. John N. Hughes
124 West Todd Street
Frankfort, KY 40601

Hon. Mark R. Hutchinson
Wilson, Hutchinson & Poteat
611 Frederica Street
Owensboro, KY 42301

William J. Senter
V.P. Rates & Regulatory Affairs
Atmos Energy Corporation
2401 New Hartford Road
Owensboro, KY 42303-1312

Douglas Walther
Senior Analyst - Rate Administration
Atmos Energy Corporation
P. O. Box 650205
Dallas, TX 75235-0205

all on this 30th day of March, 2007.

Assistant Attorney General

Attorney General's Supplemental Requests to Atmos Energy Corporation
Case No. 2006-00464

I. ACCOUNTING AND REVENUE REQUIREMENTS

1. The 13-month average Forecasted Test Period short-term debt balance of $123,886,293 shown on the AG-1-1 corrected schedule J-1, sheet 1 and supported by FR10(9)(h)11 – Revised actually is a 12-month average balance. As derived from information on FR10(9)(h)11 – Revised, the 13-month average short-term debt balance amounts to $129,979,302. Please confirm this. If you do not agree, explain your disagreement.

2. Re. response to AG-1-1: The proposed increase-related state and federal income tax number of $4,123,958 on revised Schedule C-1 is still based on a Kentucky income tax rate of 8.25% rather than 6%. Please explain this.

3. Please reconcile the operating income deficiency number of $6,093,343 and required rate of return number of 8.73% on revised Schedule C-1 to the corresponding operating income deficiency number of $6,242,775 and required rate of return number of 8.82% on revised Schedule A.

4. The total operating revenues for the Forecasted Test Period amount to $226,698,846. Please reconcile this to the total Forecasted Test Period Gross Intrastate Receipts of $244,452,110 referenced in the response to AG-1-2c. In addition, explain why the ratepayers should be paying PSC assessments of $29,169 associated with the $17,753,264 difference between the Forecasted Test Period operating revenues and Gross Intrastate Receipts.

5. With regard to the Forecasted Test Period average prepayment of $183,270 for NationsBank of Texas, shown in the response to AG-1-20, please provide the following information:

    a. Does this represent prepayment for costs associated with a credit facility fee paid to NationsBank? If not, explain what this prepayment represents.
    b. Are these costs associated with the Company's short term debt? If so, why are these prepayments included for ratemaking purposes considering that the Company has taken the position that its short term debt and all costs associated with its short term debt should not be recognized for ratemaking purposes in this case?

6. With regard to the response to AG-1-8, please indicate what portion of the referenced actual average CWIP balance of $4,798,771 is CWIP that does not accrue AFUDC.

7. Please update the response to AG-1-9b by providing actual plant balances for the months of February and March 2007.

8. With regard to the Company's depreciation reserve balances, please provide the following information:

   a. The 13 monthly accumulated depreciation and amortization balances making up the 13-month average Base Period balance of $136,809,191.
   b. Update of the AG DR 1-14 A,E response (page 1 of 6) by providing actual reserve balances for the months of February and March 2007.
   c. Explanation for the variance between the 13-month average actual Base Period reserve balance and the average projected Base Period reserve balance of $136,809,191.

9. With regard to the response to AG-1-23, please provide the following information:

   a. Update the response by providing actual gas storage volumes, dollar balances and price per Mcf numbers for the months of January, February and March 2007, as well as the resulting updated 13-month average numbers for the Base Period.
   b. Reconcile the currently reflected corrected 13-month average Base Period gas stored underground balance of $11,675,842 to the corrected 13-month average Base Period gas stored underground balance of $10,190,958 shown on Schedule B-4.1, sheet 1 contained in the response to AG-1-1.
   c. Explain why the projected 13-month average Forecasted Test Period gas stored underground volume of 2,501,840 Mcf is so much higher than the 13-month average gas stored underground volume for the Base Period.
   d. Explain why the projected average cost per Mcf of $8.71 for the Forecasted Test Period gas stored underground is so much higher than the average cost per Mcf for the Base Period gas stored underground.

10. Does the response to AG-1-24b mean that the Customer Advances for Division 91 of $35,541, once the correct coding has been applied, should be a rate base deduction balance as opposed to a rate base increase balance? If not, explain what exactly the response means and what impact it has on the requested rate base in this case.

11. Regarding the response to AG-1-25d, please provide the following information:

a. As shown on Schedule B-5, Sheet 2 of 4, on both an original filing as well as corrected filing (response to AG-1-1) basis, the Company has allocated to Kentucky 36.78% of the Division's 91 Account 255 ADITC balance in the Base Period. Explain why this Division 91 Account 255 ADITC is allocable to Kentucky in the Base Period but not in the Forecasted Test Period.
b. Explain in more detail why the Division 91 ADITC is not allocable to Kentucky for the reason that it "relates specifically to states within the old United Cities Gas Company." In addition, explain which states these are and provide proof that Atmos actually allocates 100% of the Division 91 ADITC to these states for ratemaking purposes.

12. The Company has responded that the actual ADIT balance information requested in AG-1-26 f is provided in "the response to item c and attached spreadsheet labeled AG AD1-26 ATT." However, this does not contain the requested actual monthly ADIT balances from March 2006 through January 2007, broken out by Account 190, 255, 282 and 283 deferred taxes. Please provide this information and, in addition, provide similar actual ADIT balances for February and March 2007.

13. Please reconcile the $1,500,007 difference between the Kentucky Division Deferred Tax Assets (for example for 6/30/08) of $26,488,926 and the "Total Tax Affected" balance of $24,988,919 shown on page 10 of 12 of the response to KPSC-1-27.

14. The response to KPSC-1-27 shows, among other things, detailed quarterly ADIT projections for all plant related and non plant related ADIT for Division 091 (pages 7 and 8 of 12) and for Kentucky Division 09 (pages 9 and 10 of 12). Please provide the same type of quarterly plant related and non plant related ADIT for Division 02 and Division 12.

15. As shown on Schedule B-5, Sheet 3 of 4, the Company is requesting a 13-month average Forecasted Test Period ADIT balance of $(25,090,756) for the Kentucky Division 09. Please provide a breakout of this ADIT balance by non-plant-related and plant-related ADIT components in the same detail and format as shown on page 10 of 12 of the response to KPSC-1-27.

16. As shown on Schedule B-5, Sheet 4 of 4, the Company is requesting a 13-month average Forecasted Test Period ADIT balance of $726,486 for Division 91. Please provide a breakout of this ADIT balance by non-plant-related and plant-related

ADIT components in the same detail and format as shown on page 8 of 12 of the response to KPSC-1-27.

17. As shown on Schedule B-5, Sheet 4 of 4, the Company is requesting an average Forecasted Test Period ADIT balance of $(1,903,292) for Division 12. Please provide a breakout of this ADIT balance by non-plant-related and plant-related ADIT components in the same detail and format as shown for Divisions 09 and 91 on pages 8 and 10 of 12 of the response to KPSC-1-27.

18. As shown on Schedule B-5, Sheet 3 of 4, the Company is requesting a 13-month average Forecasted Test Period ADIT balance of $665,976 for Division 02. Please provide a breakout of this ADIT balance by non-plant-related and plant-related ADIT components in the same detail and format as shown on page 8 of 12 of the response to KPSC-1-27.

19. Referring to page 10 of 12 of the response to KPSC-1-27, please indicate which of the plant-related ADIT components that are listed there represent ADIT associated with accelerated depreciation.

20. Why has the Company removed the ADIT related to Deferred Gas Costs for purposes of determining the Forecasted Test Period rate base ADIT balance?

21. The response to AG-1-27 cannot be understood without additional explanations. Please provide the following supplemental information to clarify the information contained in the response:

    a. Brief description of the titles of Other Deferred Credit items represented by the Sub Account numbers listed on pages 1 and 2 of the response.
    b. Detailed narrative explaining, in a step-by-step fashion, the information shown on pages 1 and 2 of the response, including the meaning of the ADIT column. Also, provide monthly totals for each of the monthly columns and provide the allocation percentages for the Division 2 and 91 Other Deferred Credits.
    c. Detailed narrative explaining, in a step-by-step fashion, the information shown on the next 6 pages of the response.

22. As described on pages 16 and 17 of the testimony of Mr. Smith, in determining the Forecasted Test Period late payment fees, the Company has assumed that these fees are proportionate to the residential, commercial and public authority revenues at a ratio of 0.87%. The proposed Forecasted Test Period late payment fees of $1,750,462 were calculated by the Company by applying the ratio of 0.87%

to the Forecasted Test Period residential, commercial and public authority revenues at current rates. However, the Company has not reflected the incremental late payment fees that would be generated by the requested (revised) rate increase of $10,285,628. In this regard, please provide the following information:

a. Confirm the above facts. If you do not agree, explain your disagreement in detail.
b. How much of the proposed (revised) rate increase of $10,285,628 represents the proposed rate increase amount for the residential, commercial and public authority customer classes and what would be the incremental late payment fee by applying the ratio of 0.87% to this rate increase portion?
c. The Company's uncollectible expenses and PSC fees are also a function of the Company's operating revenues and appropriate ratios for these expenses are therefore built into the Gross Revenue Conversion Factor (GRCF) in order to reflect the incremental uncollectible expenses and PSC fees associated with the proposed rate increase. Schedule H-1, Sheet 1 (corrected) shows that this results in a GRCF of 1.647605. If the late payment fee ratio of 0.87% were to be built into the GRCF as well, please provide a schedule, similar to Schedule H-1, showing to what extent this would lower the GRCF of 1.647605.

23. Attachment AG DR 1-37 line 21 shows that the Company has assumed an annual average volume per industrial customer of 5,416 for the Forecasted Test Period. In this regard, please provide the following information:

a. The annual level of 5,416 is substantially lower than the actual FY 2006, 2005 and 2004 levels of about 7,500 on average. Provide a detailed explanation for the reasons why the Company has assumed that the Forecasted Test Period average industrial customer volume is only about 72% of the actual industrial volume per customer in the last three fiscal years that averaged around 7,500.
b. Please provide the impact on the Forecasted Test Period margins (revenues net of associated gas costs), as well as on the (corrected) Forecasted Test Period rate increase request of $10,285,628 based on the assumption that the Forecasted Test Period average volume per industrial customer would be 7,500 rather than 5,416.

24. Please re-submit the side-by-side O&M expense comparisons shown in the response to AG-1-42 by (a) changing the Base Year dollar amounts in column (1)

to the corrected Base Year dollar amounts included as part of the response to AG-1-1; and (b) adding a column [between column (1) and column (2)] showing the Base Year O&M expenses based on 12 months of actual results (if available) or 11 months actual and 1 month budgeted results.

25. Re. the response to AG-1-43b: Please provide the capitalized credits included in the Forecasted Test Period account 9220 expenses that are directly associated with the vehicles and heavy equipment costs included in the Forecasted Test Period account 8740 expenses and net them against the Forecasted Test Period account 8740 expenses. In addition, explain any variance between these net Forecasted Test Period account 8740 expenses and the actual account 8740 expenses for the fiscal years ended 9/31/06 and 9/31/05.

26. Re. the response to AG-1-43c: Please provide the credits included in the Forecasted Test Period account 9220 expenses that are directly associated with the rent costs included in the Forecasted Test Period account 8740 expenses and net them against the Forecasted Test Period account 8810 expenses. In addition, explain any variance between these net Forecasted Test Period account 8810 expenses and the actual account 8810 expenses for the fiscal years ended 9/31/06 and 9/31/05.

27. The Company's PSC fees are a function (ratio of .1643%) of the Company's gross operating revenues, including the gas cost revenues. Are the PSC fees associated with the Company's gas cost revenues collected through the GCA?

28. The Company's late payment fees are a function (ratio of .87% - see Smith testimony, pages 16-17) of the Company's gross operating revenues for the residential, commercial and public authority customers, including the gas cost portion of these operating revenues. Are the late payment fees associated with the gas cost revenues for the residential, commercial and public authority customers credited to the customers in the GCA?

29. With regard to the Company's deferred gas costs, please provide the following information:

    a. Are the carrying costs (or credits) associated with positive or negative deferred gas costs charged or credited through the GCA mechanism? If not, explain how and where these deferred gas cost balances and the associated carrying costs are treated for accounting and ratemaking purposes.

b. Are the carrying costs (or credits) on positive or negative accumulated deferred income tax balances associated with positive or negative deferred gas costs charged or credited through the GCA mechanism? If not, explain how and where these accumulated deferred income taxes and the associated carrying costs are treated for accounting and ratemaking purposes.

30. Re. response to AG-1-48: Please clarify whether or not the projected cost amount of $64,769 for Gas Supplies Services is double-counted in the Forecasted Test Period O&M expenses. If not double-counted, explain why not.

31. The response to AG-1-50 provides a detailed listing of $16,659 of the total proposed expense disallowance of $59,930. Please provide a similar detailed listing (acct. no, description, dollar amount) of the remaining $43,271 portion of the total disallowed expense amount of $59,930.

32. With regard to the response to AG-1-51, please provide the following information:

a. The total expenses listed in the response amount to $178,970. What portion of this amount represents "public relations" type expenses? In addition, provide a description of the general nature and purpose of these expenses.
b. What portion of the total expense amount of $178,970 represents "community relations" type expenses? In addition, provide a description of the general nature and purpose of these expenses, including representative examples.
c. What portion of the total expense amount of $178,970 represents anything other than public relations and community relations type expenses? In addition, provide a description of the general nature and purpose of these expenses, including representative examples.
d. The proposed $100,000 expense disallowance detailed in the response to AG-1-59 includes proposed disallowances for "community relations/trade shows" and "customer relations and assistance" expenses. What is the general nature of these disallowed expenses? In addition, explain whether any of the $178,970 expenses listed in the response to AG-1-51 are included in the proposed $100,000 disallowed expenses.

33. With regard to the response to AG-1-49, please provide the following information:

a. Is the response saying that the donations amount of $5,344 was inadvertently included in the above-the-line expenses for the Forecasted Test Period? If not, explain why not.
b. Is the promotional expense of $51.20 excluded for ratemaking purposes in this case?
c. Provide a detailed breakout and description of all of the items making up the membership fees of $287.70, association dues of $43,720 and miscellaneous expense of $6,645.51. In addition, indicate if any of these expenses were proposed to be disallowed for ratemaking purposes.

34. The response to AG-1-58 indicates that the Forecasted Test Period includes a total allocated expense amount of $112,975 for governmental affairs and lobbying functions. In this regard, please provide the following information:

    a. Confirm the above fact. If you do not agree, explain your disagreement.
    b. Have any of these expenses been removed for ratemaking purposes as part of the Company's proposed $100,000 expense disallowance or any other proposed expense disallowance?
    c. Why has the Company not removed these expenses for ratemaking purposes in this case?

35. The response to AG-1-57 identifies $15,808 worth of employee welfare expenses. Are any of these expenses excluded from the Forecasted Test Period through the Company's proposed $100,000 expense disallowance? If so, please identify these disallowed expenses.

36. The response to AG-1-56 identifies $123,358 worth of employee service award expenses. Are any of these expenses excluded from the Forecasted Test Period through the Company's proposed $100,000 expense disallowance? If so, please identify these disallowed expenses.

37. The response to AG-1-85, part e indicates that the Company's Forecasted Test Period above-the-line expenses include $176,427 for the type of employee welfare expenses listed in the footnote and that none of these expenses were removed as part of the Company's proposed $100,000 expense disallowance. In this regard, please provide the following information:

    a. Confirm the above facts. If you do not agree, please explain your disagreement.

b. Are any of these expenses of $176,427 included in the employee welfare expenses identified in the responses to AG-1-56 and AG-1-57? If so, identify and quantify these expense items.

38. With regard to the response to AG-1-85, please provide the following information:

a. Why has the Company only removed $29,341 of the total Meals & Entertainment expense amount of $116,554? In addition, provide a detailed listing of all of the expense items making up the remaining expense amount of $87,213.
b. Why has the Company only removed $23,362 of the total Travel expense amount of $91,580? In addition, provide a detailed listing of all of the expense items making up the remaining expense amount of $68,218.
c. Why has the Company only removed $13,302 of the total Lodging expense amount of $75,704? In addition, provide a detailed listing of all of the expense items making up the remaining expense amount of $62,402.

39. With regard to the incentive compensation information contained in the response to AG-1-62, please provide the following information:

a. Confirm that the response to AG-1-62 C indicates that a total incentive compensation amount of $656,397 is included in the Company's Forecasted Test Period above-the-line O&M expenses. If you do not agree, explain your disagreement.
b. What type of employees (e.g., directors, top officers and executives, etc.) and how many employees are currently participating for Kentucky Direct and (separately stated) for SSU and the General Office in the Restricted Stock Long Term Incentive Plan for which $174,921 is included in the Forecasted Test Period expenses?

   In addition, provide the current total number of Kentucky Direct and (separately stated) SSU and the General Office employees.

c. What type of employees (e.g., directors, top officers, executives, senior managers, etc.) and how many employees are currently participating for Kentucky Direct and (separately stated) for SSU and the General Office in the MIP Only incentive plan for which $145,995 is included in the Forecasted Test Period expenses?
d. What type of employees and how many employees are currently participating for Kentucky Direct and (separately stated) for SSU and the

General Office in the VPP Only incentive plan for which $94,743 is included in the Forecasted Test Period expenses?

e. What type of employees and how many employees are currently participating for Kentucky Direct and (separately stated) for SSU and the General Office in the MIP & VPP incentive plan for which $240,738 is included in the Forecasted Test Period expenses?

40. As stated in AG-1-69, the actual average ratio of overtime hours to straight-time hours for the most recent 5 fiscal year period 2002-2006 as shown on Schedule G-2 is 2.055%. In this regard, please provide the following information:

a. In its response to AG-1-69d, the Company states that it budgets its overtime expenses based on historical averages. Given that the 5-year historical average indicates an overtime ratio of 2.055%, explain why the Company believes it is appropriate to use an overtime ratio of 3.286% for the Forecasted Test Period.
b. What would be the Forecasted Period overtime dollars on Schedule G-2, line 12 under the assumption that an overtime-to-straight time ratio of 2.10% had been used? In addition, provide a workpaper showing the calculations in support of this re-calculated overtime dollar amount.

41. As stated in AG-1-70, the actual average labor O&M expense ratio for the most recent 5 fiscal year period 2002-2006 as shown on Schedule G-2 is 42.013%. In this regard, please provide the following information:

a. The actual O&M expense ratio for the 4 fiscal years through 2005 averaged around 40.5%. Explain the reasons that caused this ratio to go up to 48.182% in FY 2006 and 47.22% in C2006.
b. Explain why it would be appropriate to assume that this ratio will further go up to 50% in the future (as the Company has done) rather than assuming that this ratio may settle back at the lower level it has been for the last 5 fiscal years.

42. In its response to AG-1-71, the Company states that "There are 6 vacant positions implicit in the proposed payroll numbers for the base and forecasted test periods." Does this mean that the assumed employee level of 230 for the Forecasted Test Period includes 6 vacancy positions and 224 actual employee positions, or does this mean that the Forecasted Test Period includes 236 authorized positions of which 6 are vacancy positions which the Company has not reflected for ratemaking purposes? If the former, reconcile this with Mr. Waller's testimony, page 14, lines 10-12.

43. The Company has misunderstood the AG-1-79 request. This request meant to ask for the dates of the most recent 5 general base rate proceedings of Atmos-*Kentucky* (or, formerly, *Western Kentucky Gas Company*[1]), as well as the actual rate case expenses associated with each of these prior 5 rate cases. Please provide this information.

II. DEPRECIATION

44. Please refer to the response to AG DR 1-9. Provide the attachment to the response in Excel format with all formulae intact. If any formula references a linked file, please provide that file. Also, provide the source of any hardcoded numbers.

45. Please refer to the response to AG DR 1-10. Provide the attachments to the response in Excel format with all formulae intact. If any formula references a linked file, please provide that file. Also, provide the source of any hardcoded numbers.

46. Please refer to the response to AG DR 1-15. Provide the attachments to the response in Excel format with all formulae intact. If any formula references a linked file, please provide that file. Also, provide the source of any hardcoded numbers.

47. Please refer to the response to AG DR 1-16. Provide the B-3.2F workpapers in Excel format with all formulae intact. If any formula references a linked file, please provide that file. Also, provide the source of any hardcoded numbers.

48. Please refer to the response to AG DR 1-102. Provide Schedules 1 and 2 from both of Mr. Roff's depreciation studies in electronic format (Excel) with all formulae intact. They were not included in the response to AG DR 1-87.

49. Refer to the attachment to the response to AG DR 1-109. The attachment does not address the request. It appears to be the same material provided in response to AG DR1-106. Please provide the correct attachment.

50. Please refer to the attachment to the response to AG DR 1-119.

    a. Is Task 98000 the retirement and Task 01202 the replacement?

[1] Such as, for example, the prior Case No. 99-070.

b. Are the labor hours shown in the attachments estimated hours, or actual hours? If estimated, please explain in detail how they are estimated.

51. Refer to the response to part (a) of AG DR 1-135.
    a. Please elaborate on this response, describing the circumstances and details of the acquisition.
    b. When was the plant acquired?
    c. When the plant was acquired, did Atmos book the plant at original cost, or net book value?
    d. Did the previous owner depreciate the plant? If so, what parameters were used?

52. Please refer to the response to AG DR 1-136.
    a. Part (d) to the response states that Atmos has no cushion gas in 352.3 except in Kentucky. Is the gas physically located in Kentucky? If not, where is it stored?
    b. Why is cushion gas not a factor in Atmos's other jurisdictions?
    c. If the company has cushion gas that is not subject to Kentucky jurisdiction, is that gas depreciated? If yes, provide the parameters underlying the depreciation rate. If not, explain why not.
    d. Provide all available support for the level of cushion gas included in Mr. Roff's study, including any studies or workpapers by engineering and operations personnel (see footnote 10 to Mr. Roff's testimony).

53. Refer to the response to AG DR 1-145. The Order provided with the response does not include Appendix A; the Settlement Agreement and the Order itself do not address depreciation. Please provide Appendix A and any other part of the Order that addresses depreciation.

54. Refer to the response to AG DR 1-145. Please provide the Order adopting the existing shared services rates for Kentucky.

55. Refer to the response to AG DR 1-149. Please provide the attachment referred to in the response.

56. Refer to the response to AG DR 1-147. Please provide the attachment in Excel with all formulae intact. If any formula references a linked file, please provide that file. Also, provide the source of any hardcoded numbers.

57. Refer to the response to AG DR 1-168. Please provide the attachment in Excel with all formulae intact. If any formula references a linked file, please provide that file. Also, provide the source of any hardcoded numbers.

58. Refer to the response to AG DR 1-173. Please provide the attachment to this response in Excel format with all formulae intact. If any formula references a linked file, please provide that file. Also, provide the source of any hardcoded numbers.

59. Please refer to the responses to AG DR 1-32 and AG DR 1-150. AG DR 1-32 requested KY-only FERC Form 2 reports and AG DR 1-150 requested the entire FERC Form 2 reports.
    a. The 2004 and 2005 FERC Form 2 reports provided in response to AG DR 1-150 appear to be the Kentucky-only reports. Please provide the complete reports for these years.
    b. The files provided for the 2005 KY-only report in response to AG DR 1-32 are the same parts (both the second half of the report). However, the entire file appears to have been provided in response to AG DR 1-150. Please verify that the files provided in response to 1-150 comprise the entire KY-only FERC Form 2 report for 2005.
    c. The KY-only reports provided skip from page 116 (last page of the first file) to page 204 (first page of the second file). Please confirm that this is correct. If pages are missing, please provide new files.

III. RATE DESIGN

60. If the CRS is adopted and if Atmos continues to operate as it does now, are there any circumstances in which the Company would fail to earn its authorized rate of return? If so, please describe them fully.

61. Please identify any other profit-making company, industry, enterprise or business activity that has the degree profit assurance that Atmos will enjoy if the CRS is adopted.

62. Please identify any and all instances in the history of the Company, its affiliates and predecessors where regulators have disallowed costs on the grounds that they were imprudently incurred.

63. Please provide a breakdown of the Company's residential customers according to their appliance makeup. At a minimum, identify the number of heating and non-heating customers. For each appliance group, please identify the average

annual consumption of gas and the average gas and non-gas revenue under present and proposed rates.

64. Please provide any studies in the Company's possession on the price elasticity of customer demand for gas.

65. Please provide any studies in the Company's possession on the cost of fuels that compete for the Company's gas.

66. Please provide a record of the all-in (gas and non-gas, volumetric and customer) cost of gas per mcf to heating and non-heating residential customers each month since the beginning of the heating season in 2005.

67. Please provide any studies or relevant data in the Company's possession that explore the reasons for the decline in gas customers or the decline in gas usage per customer.

68. Please provide a breakdown of residential and, separately, commercial customers according to their use of gas. Separate each of these customer groups into deciles, showing the average consumption of gas in each decile.