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March 20, 2007

Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

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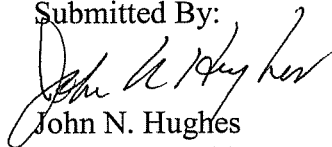
Re: Atmos Energy Corporation
Case No. 2006-00464

Dear Beth:

Atmos Energy Corporation submits the attachments for the Attorney General's data request number 149, which were not included in the filing on March 16. Also, the remaining volumes for the March 16 filing, which were delayed in overnight delivery are also being filed – 3 copies of volume AG 51-100, one copy of AG volume 161-199 and 3 copies of PSC volume 12. The Attorney General has been provided three complete copies of these responses to the PSC order and to his data requests.

If you have any questions about this matter, please contact me.

Submitted By:



John N. Hughes
124 West Todd St.
Frankfort, KY 40601
Attorney for Atmos Energy Corporation

Cc: Attorney General

Atmos Energy Corporation, Kentucky
Case No. 2006-00464
Attorney General Initial Data Request Dated February 20, 2007
DR Item 149
Witness: Don Roff

Data Request:

Provide a table summarizing separately by account the depreciation expense changes caused by life changes, net salvage changes, and other changes. Provide additional explanations of the "other changes."

Response:

Please see the worksheet attached hereto and labeled AG DR1-149 ATT.

ATMOS ENERGY CORPORATION - KENTUCKY **Response to AG1-149**

Book Depreciation Study as of September 30, 2005

Comparison of Depreciation Rates and Annual Amounts

[1] Account	[2] Description	[3] 09/30/2005 Balance \$	[4] Existing Rate %	[5] Annual Amount \$	[6] Study Rate %	[7] Annual Amount \$	[8] Increase or (Decrease) \$
	<u>PRODUCTION PLANT</u>						
325.20	Producing Leaseholds	2,353	0.00	0	5.89	139	139
325.40	Rights-of-Way	83,422	0.00	0	2.29	1,910	1,910
336.00	Purification Equipment	44,369	0.00	0	5.26	2,334	2,334
	Total Production Plant	<u>130,144</u>	<u>0.00</u>	<u>0</u>	<u>3.37</u>	<u>4,383</u>	<u>4,383</u>
	<u>STORAGE PLANT</u>						
351.00	Structures and Improvements	309,065	1.93	5,965	0.60	1,854	(4,111)
352.00	Well Construction and Equipment	2,176,341	2.71	58,979	2.11	45,921	(13,058)
352.03	Cushion Gas	1,694,833	0.00	0	2.38	40,337	40,337
352.11	Storage Rights	54,614	1.83	999	0.44	240	(759)
354.00	Compressor Station Equipment	546,780	1.51	8,256	0.60	3,281	(4,976)
355.00	M&R Station Equipment	288,851	2.06	5,950	0.12	347	(5,604)
	Total Storage Plant	<u>5,070,484</u>	<u>1.58</u>	<u>80,150</u>	<u>1.81</u>	<u>91,980</u>	<u>11,830</u>
	<u>TRANSMISSION PLANT</u>						
365.20	Rights-of-Way	812,196	0.89	7,229	1.65	13,401	6,173
366.00	Structures and Improvements	283,237	1.39	3,937	2.05	5,806	1,869
367.00	Mains	22,044,698	1.27	279,968	1.85	407,827	127,859
369.00	M&R Station Equipment	2,952,222	2.28	67,311	1.48	43,693	(23,618)
	Total Transmission Plant	<u>26,092,353</u>	<u>1.37</u>	<u>358,444</u>	<u>1.80</u>	<u>470,727</u>	<u>112,284</u>

[1] Account	[2] Description	[9] Existing ASL Years	[10] Annual Amount \$	[11] Study ASL Years	[12] Annual Amount \$	[13] Existing Net Salv. %	[14] Annual Amount \$	[15] Study Net Salv. %	[16] Annual Amount \$	[17] Other \$
PRODUCTION PLANT										
325.20	Producing Leaseholds	-	-	50.0	47	-	-	-	-	92
325.40	Rights-of-Way	-	-	50.0	1,668	-	-	-	-	242
336.00	Purification Equipment	-	-	50.0	887	-	-	-	-	1,446
	Total Production Plant				2,603					1,780
STORAGE PLANT										
351.00	Structures and Improvements	45.0	6,868	50.0	6,181	(5.0)	6,490	5.0	5,872	(2,806)
352.00	Well Construction and Equipment	50.0	43,527	50.0	43,527	(50.0)	65,290	(40.0)	60,938	(8,705)
352.03	Cushion Gas	-	-	50.0	33,897	-	-	-	-	6,440
352.11	Storage Rights	40.0	1,365	50.0	1,092	-	1,092	-	1,092	(486)
354.00	Compressor Station Equipment	40.0	13,670	50.0	10,936	(10.0)	12,029	-	10,936	(1,148)
355.00	M&R Station Equipment	40.0	7,221	50.0	5,777	-	5,777	-	5,777	(4,159)
	Total Storage Plant		72,651		101,410		90,679		84,615	(10,864)
TRANSMISSION PLANT										
365.20	Rights-of-Way	60.0	13,537	55.0	14,767	-	14,767	-	14,767	4,942
366.00	Structures and Improvements	45.0	6,294	50.0	5,665	-	5,665	-	5,665	2,499
367.00	Mains	50.0	440,894	55.0	400,813	(5.0)	420,853	(25.0)	501,016	87,778
369.00	M&R Station Equipment	40.0	73,806	45.0	65,605	-	65,605	(2.0)	66,917	(16,729)
	Total Transmission Plant		534,530		486,850		506,890		588,365	78,490

ATMOS ENERGY CORPORATION - KENTUCKY Response to AG1-149

Book Depreciation Study as of September 30, 2005

Comparison of Depreciation Rates and Annual Amounts

[1] Account	[2] Description	[3] 09/30/2005 Balance \$	[4] Existing Rate %	[5] Annual Amount \$	[6] Study Rate %	[7] Annual Amount \$	[8] Increase or (Decrease) \$
	<u>DISTRIBUTION PLANT</u>						
374.02	Land Rights	145,459	1.68	2,444	1.86	2,706	262
375.00	Structures and Improvements	468,328	1.95	9,132	3.18	14,893	5,760
376.00	Mains	95,924,845	2.39	2,292,604	2.43	2,330,974	38,370
378.00	M&R Station Equipment	2,617,970	2.49	65,187	1.92	50,265	(14,922)
379.00	City Gate Equipment	2,804,310	2.57	72,071	2.43	68,145	(3,926)
380.00	Services	69,190,312	6.86	4,746,455	5.23	3,618,653	(1,127,802)
381.00	Meters	13,775,723	3.35	461,487	8.06	1,110,323	648,837
382.00	Meter Installations	33,358,910	3.06	1,020,783	4.60	1,534,510	513,727
383.00	House Regulators	4,816,804	2.85	137,279	2.90	139,687	2,408
384.00	House Regulator Installations	154,276	3.37	5,199	2.02	3,116	(2,083)
385.00	Industrial M&R Equipment	4,433,322	2.73	121,030	2.61	115,710	(5,320)
	Total Distribution Plant	227,690,259	3.92	8,933,671	3.95	8,988,982	55,311
	<u>GENERAL PLANT</u>						
390.00	Structures and Improvements	966,202	2.12	20,483	9.91	95,751	75,267
390.09	Improvements to Leased Premises	1,382,343	5.00	69,117	2.36	32,623	(36,494)
391.00	Office Furniture and Equipment	2,305,350	7.05	162,527	6.22	143,393	(19,134)
392.00	Transportation Equipment	761,620	8.92	67,937	59.79	455,373	387,436
394.00	Tools, Shop and Garage Equipment	2,118,023	3.28	69,471	6.63	140,425	70,954
396.00	Power Operated Equipment	663,629	2.79	18,515	20.76	137,769	119,254
397.00	Communication Equipment	1,498,100	5.21	78,051	5.43	81,347	3,296
398.00	Miscellaneous Equipment	2,160,051	10.94	236,310	4.26	92,018	(144,291)
399.01	OTP - Servers Hardware	175,990	14.29	25,149	2.71	4,769	(20,380)
399.03	OTP - Network Hardware	511,781	14.29	73,134	5.22	26,715	(46,419)
399.06	OTP - PC Hardware	2,702,795	18.51	500,287	0.61	16,487	(483,800)
399.07	OTP - PC Software	242,979	15.85	38,512	19.16	46,555	8,043
399.08	OTP - Application Software	522,254	12.50	65,282	17.49	91,342	26,060
	Total General Plant	16,011,117	8.90	1,424,775	8.52	1,364,567	(60,208)
	Total Depreciable Plant	274,994,357	3.93	10,797,039	3.97	10,920,639	123,599
	Intangible Plant	128,183					
	Non-Depreciable Plant	486,462					
	Fully Depreciated Plant	2,303,510					
	Total Plant in Service	277,912,512					

[1] Account	[2] Description	[9] Existing ASL Years	[10] Annual Amount \$	[11] Study ASL Years	[12] Annual Amount \$	[13] Existing Net Salv. %	[14] Annual Amount \$	[15] Study Net Salv. %	[16] Annual Amount \$	[17] Other \$
<u>DISTRIBUTION PLANT</u>										
374.02	Land Rights	60.0	2,424	55.0	2,645	-	2,645	-	2,645	41
375.00	Structures and Improvements	50.0	9,367	50.0	9,367	-	9,367	(10.0)	10,303	4,824
376.00	Mains	50.0	1,918,497	55.0	1,744,088	(5.0)	1,831,292	(25.0)	2,180,110	(136,039)
378.00	M&R Station Equipment	40.0	65,449	50.0	52,359	-	52,359	(5.0)	54,977	(4,451)
379.00	City Gate Equipment	40.0	70,108	50.0	56,086	-	56,086	(15.0)	64,499	1,683
380.00	Services	45.0	1,537,562	40.0	1,729,758	(150.0)	4,324,395	(75.0)	3,027,076	(22,679)
381.00	Meters	35.0	393,592	25.0	551,029	-	551,029	(25.0)	688,786	353,642
382.00	Meter Installations	35.0	953,112	40.0	833,973	-	833,973	(25.0)	1,042,466	424,373
383.00	House Regulators	35.0	137,623	30.0	160,560	10.0	144,504	-	160,560	(36,585)
384.00	House Regulator Installations	35.0	4,408	35.0	4,408	-	4,408	-	4,408	(2,083)
385.00	Industrial M&R Equipment	40.0	110,833	40.0	110,833	-	110,833	(15.0)	127,458	(21,945)
	Total Distribution Plant		5,202,975		5,255,105		7,920,891		7,363,289	560,782
<u>GENERAL PLANT</u>										
390.00	Structures and Improvements	45.0	21,471	15.0	64,413	(5.0)	67,634	-	64,413	35,545
390.09	Improvements to Leased Premises	20.0	69,117	25.0	55,294	-	55,294	-	55,294	(22,670)
391.00	Office Furniture and Equipment	15.0	153,690	18.0	128,075	5.0	121,671	-	128,075	77
392.00	Transportation Equipment	8.0	95,203	8.0	95,203	15.0	80,922	10.0	85,682	382,676
394.00	Tools, Shop and Garage Equipment	30.0	70,601	20.0	105,901	-	105,901	1.0	104,842	36,712
396.00	Power Operated Equipment	15.0	44,242	15.0	44,242	10.0	39,818	5.0	42,030	117,042
397.00	Communication Equipment	15.0	99,873	20.0	74,905	-	74,905	-	74,905	28,264
398.00	Miscellaneous Equipment	10.0	216,005	20.0	108,003	-	108,003	-	108,003	(36,289)
399.01	OTP - Servers Hardware	7.0	25,141	10.0	17,599	-	17,599	-	17,599	(12,837)
399.03	OTP - Network Hardware	7.0	73,112	10.0	51,178	-	51,178	-	51,178	(24,485)
399.06	OTP - PC Hardware	5.0	540,559	10.0	270,280	-	270,280	2.0	264,874	(208,115)
399.07	OTP - PC Software	5.0	48,596	5.0	48,596	-	48,596	-	48,596	8,043
399.08	OTP - Application Software	8.0	65,282	8.0	65,282	-	65,282	-	65,282	26,060
	Total General Plant		1,522,891		1,128,969		1,107,062		1,110,773	330,023
	Total Depreciable Plant		7,333,048		6,974,937		9,625,542		9,147,041	960,211
	Intangible Plant									
	Non-Depreciable Plant									
	Fully Depreciated Plant									
	Total Plant in Service									(478,501)