

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

APPLICATION OF ATMOS ENERGY)
CORPORATION FOR MODIFICATION)
OF ITS APPROVED HEDGING)
PROGRAM)

Case No. 2007-00551

ATTORNEY GENERAL'S SUPPLEMENTAL REQUESTS FOR INFORMATION
REDACTED (PUBLIC) VERSION

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 [hereinafter referred to as "Atmos"] 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) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for Atmos with an electronic version of these questions, upon request.

(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 any request appears confusing, please request clarification directly from 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, please 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, please notify the Office of the Attorney General as soon as possible.

(10) 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.

(11) 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.

(12) 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,

JACK CONWAY
ATTORNEY GENERAL

A handwritten signature in cursive script, appearing to read "Lawrence W. Cook", is written over a horizontal line.

LAWRENCE W. COOK
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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

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

Mark A. Martin
Atmos Energy Corporation
2401 New Hartford Rd.
Owensboro, KY 42303-1312

29th
this ___ day of Feb., 2008



Assistant Attorney General

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1. Refer to Atmos' Confidential Revised Response (dated February 28, 2008) to AG 1-3.
 - a. Please state whether the summary sheets presented in response to AG 1-3 were produced solely as a consequence of the Attorney General's data request in the instant matter, or whether Atmos produced them as records kept in the ordinary course of business. In other words, did these summary sheets (or any compilations of similar data) pre-exist the filing of the instant case?
 - b. Please identify (by name and title) the person(s) who produced both the original summary sheets and the revised summary sheets for October 2003, November 2003, and December 2004.
 - c. Explain, in detail, how the [REDACTED] calculations were made.
 - d. Please provide an explanation of how and why the actual [REDACTED] did not appear on the original summary sheets.
 - e. Please explain for how long the [REDACTED] [REDACTED] has existed (i.e., whether it continued for a certain length of time, and if so, how long).
 - (i) Is the [REDACTED] continuing today?
 - f. Explain in full detail the ramifications of [REDACTED].
 - (i) To what extent did Atmos' accounting systems rely on the volumetric data set forth in the summary sheets?
[REDACTED] Was the volumetric data set forth in the summary sheets used in any manner in the calculation of [REDACTED] [REDACTED]? If so, explain in full detail, including whether it was so used in Atmos' most recent [REDACTED] [REDACTED]
 - (iii) Was the [REDACTED] data set forth in the summary sheets used in any manner in calculating Atmos' rates? If so, explain in full detail.

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- (iv) Does the [REDACTED] data set forth in the summary sheets have any bearing, in any manner, on the company's accounting data, systems, and / or standards? Explain.
 - (v) Was the errant [REDACTED] data set forth in the summary sheets reflected [REDACTED] of Atmos Energy Marketing (or any other Atmos affiliate or subsidiary) in any manner? If so, for how long? Explain the ramifications.
2. Explain why as of June, 2005 individual producer costs were not provided.
 3. Refer again to Atmos' Confidential Revised Response (dated February 28, 2008) to AG 1-3. Referring to invoices from individual producers / suppliers, explain why in some invoices amounts for [REDACTED] appear, but do not appear in other invoices.
 4. Refer again to Atmos' Confidential Revised Response (dated February 28, 2008) to AG 1-3; invoices from "[REDACTED]." Explain why under the category labeled "Quantity Shipped" the amount is [REDACTED]. Please provide the mathematical calculation(s) to arrive at the [REDACTED].
 5. Is Atmos confident that the other data set forth in the summary sheets and in the invoices are accurate?