## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF ATMOS ENERGY)CORPORATION FOR APPROVAL OF THIRD)CASE NO.PARTY NATURAL GAS SUPPLY AND ASSET)2015-00161MANAGEMENT AGREEMENT AND FOR A)DEVIATION FROM THE PRICING)REQUIREMENTS OF KRS 278.2207)

## COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION TO ATMOS ENERGY CORPORATION

Atmos Energy Corporation ("Atmos"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due within ten days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, 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.

Atmos shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Atmos fails or refuses to furnish all or part of the requested information, Atmos shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a document containing personal information, Atmos shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to page 2 of the application. The first sentence states: "Various proposals were received by the Company prior to the deadline of April 13, 2015." State if Atmos received any other proposals outside the ones it has already submitted in this proceeding. If so, provide the proposals, as well as any bid analysis schedules which show how the other proposals compare.

2. Atmos Energy Marketing ("AEM") has been Atmos's asset manager from 2000 to the present. Identify and describe all aspects of Atmos's system and its operation of which AEM has consequently gained knowledge not available to other parties bidding to become Atmos's asset manager.

3. Given the corporate structure of Atmos and AEM's subsidiary status, provide a detailed description of the following:

a. The means of communication between AEM and Atmos during the term of the parties' existing supply agreement; and

Case No. 2015-00161

-2-

b. The controls, or systems, Atmos has in place to assure that the bid process and subsequent transactions are performed at arms-length as they pertain to AEM.

4. State if any changes have been made to Atmos's Gas Supply Procedures Manual or its Code of Conduct since they were filed in Case No. 2011-00201.<sup>1</sup> If so, provide updated copies which identify the changes.

Jeff Derouen Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED AUG 1 1 2015

cc: Parties of Record

<sup>&</sup>lt;sup>1</sup> Case No. 2011-00201, Application of Atmos Energy Corporation for Approval of Third Party Gas Supply Agreements and for Deviation from the Pricing Requirements of KRS 278.2207 (Ky. PSC Oct. 13, 2011).

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