

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

MAR 15 2016

PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF WKG STORAGE, INC.)
FOR RATE ADJUSTMENT FOR SMALL) Case No. 2016-00053
UTILITIES PURSUANT TO 807 KAR 5:076)

ATMOS ENERGY CORPORATION'S
MOTION TO INTERVENE

Atmos Energy Corporation ("Atmos") by counsel, pursuant to 807 KAR 5:001(4)(11) moves the Kentucky Public Service Commission to grant it full intervenor status in this action.

The address for Atmos Energy is:

5430 LBJ Freeway
1800 Three Lincoln Center
Dallas, Texas 75240

In support of this Motion, Atmos states that it is the sole customer of WKG Storage, Inc. and intervention by Atmos is likely to present issues or develop facts that will assist the Commission in fully considering this matter without complicating or disrupting the proceedings. A potential intervenor must have "a special interest in the proceeding which is not otherwise adequately represented" (807 KAR 5:001 §11(2)(b) and the "special interest" must relate to the rates or service of a utility. (*In the Matter of The 2008 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, Case No. 2008-00148, Order at 3 (July 18, 2008).

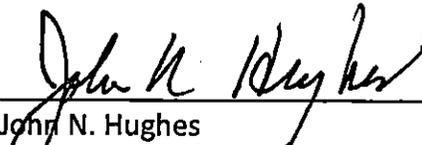
As WKG Storage's only customer, Atmos has an interest that no other party can represent. It has information about the rates and service of WKG Storage that no other party has or could have. Because of this specific knowledge, Atmos is in a unique position to provide

the Commission information about the operations of WKG Storage and the impact of the proposed rate increase on Atmos, which cannot be presented by any other party.

The interest of Atmos relates specifically to the rates and service of WKG Storage. The impact of the proposed rate increase and the potential for that increase on Atmos' operations meets the requirement for intervention.

Finally, the intervention by Atmos will not unduly disrupt the proceedings as this motion is filed within the period allowed by the Order of March 11, 2016. Further, Atmos is a regulated utility before the Commission and it and its counsel are familiar with the Commission's regulations and practices.

For these reasons, Atmos moves for full intervention in this matter.



John N. Hughes
124 West Todd Street
Frankfort, KY 40601
(502) 227-7270
Fax: None
inhughes@johnnhughespsc.com

CERTIFICATE OF SERVICE AND FILING

Counsel certifies that an original and ten copies of the foregoing were served and filed by hand delivery to the 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 prepaid to:

Louis P. Gregory
WKG Storage, Inc.
PO Box 650205
Dallas, Texas 75265-0205
louis.gregory@atmosenergy.com

T. Tommy Littlepage
WILSON, HUTCHINSON & LITTLEPAGE
611 Frederica Street
Owensboro, Kentucky 42301
ttommy@whplawfirm.com

This 15th day of March, 2016.

