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September 19, 2017

John S. Lyons
Deputy Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, Kentucky 40602

RE: Case No. 2017-000169

Dear Mr. Lyons:

Please find attached, for filing by your office, an original plus ten (10) copies, of an Affidavit of George B. Tucker.

Please let me know if there are questions concerning this. Thanks.

Very truly yours,

WILSON, HUTCHINSON & LITTLEPAGE



Mark R. Hutchinson
Counsel for Atmos Energy

c: Mark Martin
George B. Tucker
John N. Hughes

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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

THE APPLICATION OF ATMOS ENERGY)	
CORPORATION FOR AUTHORITY TO DEVIATE)	Case No.
FROM THE REQUIREMENTS OF 807 KAR 5:006)	2017-00169
SECTION 26(5)(a)1.c AND 5(c))	

AFFIDAVIT

Comes now Geroge B. Tucker who, after being first duly sworn, states as follows:

1. I am Manager of Compliance for Atmos Energy Corporation (the "Company") in Kentucky. I have held this position with the Company since December 1, 2008. Prior to that time my position with the Company was Operations Manager.

2. As Manager of Compliance for the Company in Kentucky, it is my responsibility to assure that our policies, procedures and field operations are in compliance with all applicable regulations, including those related to safety.

3. I am, and have been for the prior eight (8) years, accordingly responsible or the Company's compliance with the Kentucky regulations governing the inspections of meters, curb boxes and service line values under 807 KAR 5:006, Section 26(5)(a) 1.c and 807 KAR 5:006, Section 25 (5)(c).

4. The Company has historically, and currently, inspects both the accessibility of curb boxes and service line valves and their operable condition, on an annual basis, even though inspections for accessibility are required annually, and inspections for operable condition are required at the time of meter tests, which is every ten (10) years.

5. Of the 8,884 inspections performed on curb boxes and service line values since 2014, only 40 resulted in any remedial or further action or approximately .0045 percent.

6. Moreover, In the event of an emergency involving a curb box or service line value that are either not accessible or inoperable, the Company has an area or master shut off valve that can be used to stop the flow of gas. These area or master shut off valves generally cover approximately 2500 meters.

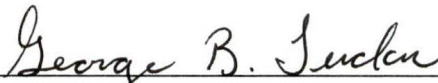
7. At the request of Commission Staff made during last week's Informal Conference, I reviewed 2,624 leak repair reports from January 1, 2015 to date. Only three of

these leak repairs contained documentation that the gas was shut off utilizing the curb box stop for the repair process and there was no indication that any curb box could not be located at the time of a repair.

8. Given the Company's history with such a small number of curb boxes and service line values being inaccessible or inoperable, and further given that in the event of an emergency, gas flow can be stopped by use of the area or master value, there is, as a practical matter, no measurable increase in risk by allowing the accessibility inspections for curb boxes and service line values to be performed with the inspection for operable condition on a three year cycle. This would result in the inspections for operable condition occurring on a three year cycle rather than the currently required ten year cycle.


9. By allowing the accessibility inspection to occur contemporaneous with the operable condition inspections, significant savings for the ratepayers can be achieved with no discernable decrease in safety.

Further the Affiant smith not, on the 18th day of September, 2017.



George B. Tucker

SUBSCRIBED AND SWORN to before me by George B. Tucker, on this the 18th day of September, 2017.



Notary Public
Notary ID: 529633
My Commission Expires: 3-12-18