ATMOS energy

September 29, 2017

Ms. Talina Mathews, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

Re: Case No. 2017-00000

Dear Ms. Mathews:

We are filing the enclosed original and ten (10) copies of a notice under the provisions of our Gas Cost Adjustment Clause, Case No. 2013-00148. **This filing contains a Petition of Confidentiality and confidential documents.**

Please indicate receipt of this filing by stamping and dating this letter and returning a scanned copy by E-mail to Anthony.Croissant@atmosenergy.com.

If you have any questions, feel free to call me at 972-855-3115.

Sincerely,

Anthony Croissant
Sr. Rate Administration Analyst

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:

GAS COST ADJUSTMENT)
FILING OF)
ATMOS ENERGY CORPORATION)

Case No. 2017-00000

NOTICE

QUARTERLY FILING

For The Period

November 1, 2017 – January 31, 2018

Attorney for Applicant

Mark R. Hutchinson
611 Frederica Street
Owensboro, Kentucky 42301

September 29, 2017

Atmos Energy Corporation, ("the Company"), is duly qualified under the laws of the Commonwealth of Kentucky to do its business. The Company is an operating public utility engaged in the business of purchasing, transporting and distributing natural gas to residential, commercial and industrial users in western and central Kentucky. The Company's principal operating office and place of business is 3275 Highland Pointe Drive, Owensboro, Kentucky 42303. Correspondence and communications with respect to this notice should be directed to:

Mark A. Martin
Vice President of Rates & Regulatory Affairs
Kentucky/Mid-States Division
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, Kentucky 42303

Mark R. Hutchinson
Attorney for Applicant
611 Frederica Street
Owensboro, Kentucky 42301

Liza Philip
Manager, Rate Administration
Atmos Energy Corporation
5430 LBJ Freeway, Suite 700
Dallas, Texas 75240

Anthony Croissant
Sr. Rate Administration Analyst
Atmos Energy Corporation
5430 LBJ Freeway, Suite 700
Dallas, Texas 75240

The Company gives notice to the Kentucky Public Service Commission, hereinafter "the Commission", pursuant to the Gas Cost Adjustment Clause contained in the Company's settlement gas rate schedules in **Case No. 2013-00148**.

The Company hereby files Eighteenth Revised Sheet No. 4, Eighteenth Revised Sheet No. 5, and Eighteenth Revised Sheet No. 6 to its PSC No. 2, Rates, Rules and Regulations for Furnishing Natural Gas to become effective November 1, 2017.

The Gas Cost Adjustment (GCA) for firm sales service is $4.9148 per Mcf and $3.6981 per Mcf for interruptible sales service. The supporting calculations for the Eighteenth Revised Sheet No. 5 are provided in the following Exhibits:

Exhibit A – Comparison of Current and Previous Gas Cost Adjustment (GCA) Cases

Exhibit B – Expected Gas Cost (EGC) Calculation

Exhibit C - Rates used in the Expected Gas Cost (EGC)

Exhibit D – Correction Factor (CF) Calculation

Exhibit E – Refund Factor (RF) Calculation

Exhibit E – Performance Based Rate Recovery Factor (PBRRF) Calculation

Since the Company's last GCA filing, Case No. 2017-00260, the following changes have occurred in its pipeline and gas supply commodity rates for the GCA period.

1. The commodity rates per Mcf used are based on historical estimates and/or current data for the quarter of November 1, 2017 through January 31, 2018, as shown in Exhibit C, page 1 of 2.

2. The G-1 Expected Gas Cost will be approximately $4.5613 per Mcf for the quarter of November 1, 2017 through January 31, 2018, as compared to $4.7963 per Mcf used

for the period of August 1, 2017 through October 31, 2017. The G-2 Expected Commodity Gas Cost will be approximately $3.3446 for the quarter of November 1, 2017 through January 31, 2018 as compared to $3.5806 for the period of August 1, 2017 through October 31, 2017.

3. The Company's notice sets out a new Correction Factor of $0.1816 per Mcf which will remain in effect until at least January, 2018.

4. The Refund Factor of ($0.0000) per Mcf will remain in effect until the refund has been completed.

The GCA tariff as approved in Case No. 92-558 provides for a Correction Factor (CF) which compensates for the difference between the expected gas cost and the actual gas cost for prior periods. A revision to the GCA tariff effective December 1, 2001, Filing No. T62-1253, provides that the Correction Factor be filed on a quarterly basis. In Case No. 2013-00148, effective January 24, 2014, the Company's GCA tariff allows recovery of any gas cost which is uncollectible, to be included in each February GCA filing.

The Company is filing its updated Correction Factor that is based upon the balance in the Company's 1910 Account as of July 31, 2017 (August, 2017 general ledger). The calculation for the Correction Factor is shown on Exhibit D, Page 1 of 6. Also beginning with the January, 2014 GCA filing in compliance with tariff page 16 from the Rate Case filing

(Case No. 2013-00148) the Company is allowed to recover the net uncollectible gas cost (net uncollectible gas cost less subsequently collected gas cost).

WHEREFORE, Atmos Energy Corporation requests this Commission, pursuant to the Commission's order in Case No. 99-070, to approve the Gas Cost Adjustment (GCA) as filed in Eighteenth Revised Sheet No. 5; and Eighteenth Revised Sheet No. 6 setting out the General Transportation Tariff Rate T-3 and T-4 for each respective sales rate for meter readings made on and after November 1, 2017.

DATED at Dallas, Texas this 29th Day of September, 2017.

ATMOS ENERGY CORPORATION

By: ______________________

Anthony Croissant
Sr. Rate Administration Analyst
Atmos Energy Corporation

FOR ENTIRE SERVICE AREA

P.S.C. KY NO. 2

EIGHTEENTH REVISED SHEET NO. 4

ATMOS ENERGY CORPORATION
NAME OF UTILITY

CANCELLING

SEVENTEENTH REVISED SHEET NO. 4

Current Rate Summary
Case No. 2017-00000

Firm Service

Base Charge:

Residential (G-1)	-	$17.50	per meter per month
Non-Residential (G-1)	-	44.50	per meter per month
Transportation (T-4)	-	375.00	per delivery point per month
Transportation Administration Fee	-	50.00	per customer per meter

Rate per Mcf [2]			Sales (G-1)			Transportation (T-4)			
First	300 [1]	Mcf	@	6.4488	per Mcf	@	1.5340	per Mcf	(R, -)
Next	14,700 [1]	Mcf	@	5.8648	per Mcf	@	0.9500	per Mcf	(R, -)
Over	15,000	Mcf	@	5.6548	per Mcf	@	0.7400	per Mcf	(R, -)

Interruptible Service

Base Charge	-	$375.00	per delivery point per month
Transportation Administration Fee	-	50.00	per customer per meter

Rate per Mcf [2]			Sales (G-2)			Transportation (T-3)			
First	15,000 [1]	Mcf	@	4.5481	per Mcf	@	0.8500	per Mcf	(R, -)
Over	15,000	Mcf	@	4.3386	per Mcf	@	0.6405	per Mcf	(R, -)

[1] All gas consumed by the customer (sales, transportation; firm and interruptible) will be considered for the purpose of determining whether the volume requirement of 15,000 Mcf has been achieved.

[2] DSM, PRP and R&D Riders may also apply, where applicable.

DATE OF ISSUE September 29, 2017
MONTH / DATE / YEAR

DATE EFFECTIVE November 1, 2017
MONTH / DATE / YEAR

ISSUED BY /s/ Mark A. Martin
SIGNATURE OF OFFICER

TITLE Vice President – Rates & Regulatory Affairs

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO 2017-00000 DATED N/A

FOR ENTIRE SERVICE AREA

P.S.C. KY NO. 2

EIGHTEENTH REVISED SHEET NO. 5

ATMOS ENERGY CORPORATION
NAME OF UTILITY

CANCELLING

SEVENTEENTH REVISED SHEET NO. 5

Current Gas Cost Adjustments

Case No. 2017-00000

Applicable

For all Mcf billed under General Sales Service (G-1) and Interruptible Sales Service (G-2).

Gas Charge = GCA

GCA = EGC + CF + RF + PBRRF

Gas Cost Adjustment Components	G - 1	G-2	
EGC (Expected Gas Cost Component)	4.5613	3.3446	(R, R)
CF (Correction Factor)	0.1816	0.1816	(I, I)
RF (Refund Adjustment)	0.0000	0.0000	(-, -)
PBRRF (Performance Based Rate Recovery Factor)	0.1719	0.1719	(-, -)
GCA (Gas Cost Adjustment)	$4.9148	$3.6981	(R, R)

DATE OF ISSUE September 29, 2017
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DATE EFFECTIVE November 1, 2017
MONTH / DATE / YEAR

ISSUED BY /s/ Mark A. Martin
SIGNATURE OF OFFICER

TITLE Vice President – Rates & Regulatory Affairs

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO 2017-00000 DATED N/A

FOR ENTIRE SERVICE AREA

P.S.C. KY NO. 2

EIGHTEENTH REVISED SHEET NO. 6

ATMOS ENERGY CORPORATION
NAME OF UTILITY

CANCELLING

SEVENTEENTH REVISED SHEET NO. 6

Current Transportation

Case No. 2017-00000

The Transportation Rates (T-3 and T-4) for each respective service net monthly rate is as follows:

System Lost and Unaccounted gas percentage: 1.61%

				Simple Margin		Non-Commodity		Gross Margin		
Transportation Service [1]										
Firm Service (T-4)										
First	300	Mcf	@	$1.5340	+	$0.0000	=	$1.5340	per Mcf	(-)
Next	14,700	Mcf	@	0.9500	+	0.0000	=	0.9500	per Mcf	(-)
All over	15,000	Mcf	@	0.7400	+	0.0000	=	0.7400	per Mcf	(-)
Interruptible Service (T-3)										
First	15,000	Mcf	@	$0.8500	+	$0.0000	=	$0.8500	per Mcf	(-)
All over	15,000	Mcf	@	0.6405	+	0.0000	=	0.6405	per Mcf	(-)

[1] Excludes standby sales service.

DATE OF ISSUE September 29, 2017
MONTH / DATE / YEAR

DATE EFFECTIVE November 1, 2017
MONTH / DATE / YEAR

ISSUED BY /s/ Mark A. Martin
SIGNATURE OF OFFICER

TITLE Vice President – Rates & Regulatory Affairs

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION
IN CASE NO 2017-00000 DATED N/A

Atmos Energy Corporation
Comparison of Current and Previous Cases
Sales Service

Line No.	Description	(a) Case No. 2017-00260 $/Mcf	(b) Case No. 2017-00000 $/Mcf	(c) Difference $/Mcf
1	**G - 1**			
2				
3	Distribution Charge (per Case No. 2015-00343)			
4	First 300 Mcf	1.5340	1.5340	0.0000
5	Next 14,700 Mcf	0.9500	0.9500	0.0000
6	Over 15,000 Mcf	0.7400	0.7400	0.0000
7				
8	Gas Cost Adjustment Components			
9	EGC (Expected Gas Cost):			
10	Commodity	3.3644	3.1294	(0.2350)
11	Demand	1.4319	1.4319	0.0000
12	Total EGC	4.7963	4.5613	(0.2350)
13	CF (Correction Factor)	0.0882	0.1816	0.0934
14	RF (Refund Adjustment)	0.0000	0.0000	0.0000
15	PBRRF (Performance Based Rate Recovery Factor)	0.1719	0.1719	0.0000
16	GCA (Gas Cost Adjustment)	5.0564	4.9148	(0.1416)
17				
18	Rate per Mcf (GCA included)			
19	First 300 Mcf	6.5904	6.4488	(0.1416)
20	Next 14,700 Mcf	6.0064	5.8648	(0.1416)
21	Over 15,000 Mcf	5.7964	5.6548	(0.1416)
22				
23				
24	**G - 2**			
25				
26	Distribution Charge (per Case No. 2015-00343)			
27	First 15,000 Mcf	0.8500	0.8500	0.0000
28	Over 15,000 Mcf	0.6405	0.6405	0.0000
29				
30	Gas Cost Adjustment Components			
31	EGC (Expected Gas Cost):			
32	Commodity	3.3644	3.1294	(0.2350)
33	Demand	0.2162	0.2152	(0.0010)
34	Total EGC	3.5806	3.3446	(0.2360)
35	CF (Correction Factor)	0.0882	0.1816	0.0934
36	RF (Refund Adjustment)	0.0000	0.0000	0.0000
37	PBRRF (Performance Based Rate Recovery Factor)	0.1719	0.1719	0.0000
38	GCA (Gas Cost Adjustment)	3.8407	3.6981	(0.1426)
39				
40	Rate per Mcf (GCA included)			
41	First 300 Mcf	4.6907	4.5481	(0.1426)
42	Over 14,700 Mcf	4.4812	4.3386	(0.1426)
43				
44				

Line No.		Case No.	Effective Date	RF
45	**Refund Factor (RF)**			
47				
48		Case No.	Effective Date	RF
49				
50	1 -	2017-00156	5/1/2017	0.0000
51	2 -	2017-00180	6/1/2017	0.0000
52	3 -	2017-00260	8/1/2017	0.0000
53	4 -	2017-00000	11/1/2017	0.0000
54				
55	Total Refund Factor (RF)			$0.0000

Atmos Energy Corporation
Comparison of Current and Previous Cases
Transportation Service

Line No.	Description			(a) Case No. 2017-00260	(b) Case No. 2017-00000	(c) Difference
				$/Mcf	$/Mcf	$/Mcf
1	**T -4 Transportation Service / Firm Service (High Priority)**					
2						
3	Simple Margin / Distribution Charge (per Case No. 2015-00343)					
4	First	300	Mcf	1.5340	1.5340	0.0000
5	Next	14,700	Mcf	0.9500	0.9500	0.0000
6	Over	15,000	Mcf	0.7400	0.7400	0.0000
7						
8						
9	**T - 3 / Interruptible Service (Low Priority)**					
10						
11	Simple Margin / Distribution Charge (per Case No. 2015-00343)					
12	First	15,000	Mcf	0.8500	0.8500	0.0000
13	Over	15,000	Mcf	0.6405	0.6405	0.0000
14						

Atmos Energy Corporation
Expected Gas Cost (EGC) Calculation
Texas Gas Transmission - Non-Commodity

Line No.	Description		(a) Tariff Sheet No.	(b) Annual Units	(c) Rate	(d) Non-Commodity Total	(e) Non-Commodity Demand
				MMbtu	$/MMbtu	$	$
1	**SL to Zone 2**						
2	NNS Contract #	29760		12,340,360			
3	Base Rate		Section 4.4 - NNS		0.3088	3,810,703	3,810,703
4							
5	Total SL to Zone 2			12,340,360		3,810,703	3,810,703
6							
7	**SL to Zone 3**						
8	NNS Contract #	29762		27,757,688			
9	Base Rate		Section 4.4 - NNS		0.3543	9,834,549	9,834,549
10							
11	FT Contract #	29759		6,022,500			
12	Base Rate		Section 4.1 - FT		0.2939	1,770,013	1,770,013
13							
14	FT Contract #	34380		3,650,000			
15	Base Rate		Section 4.1 - FT		0.2939	1,072,735	1,072,735
16							
17	Total SL to Zone 3			37,430,188		12,677,297	12,677,297
18							
19	**SL to Zone 4**						
20	NNS Contract #	29763		3,320,769			
21	Base Rate		Section 4.4 - NNS		0.4190	1,391,402	1,391,402
22							
23	FT Contract #	31097		1,825,000			
24	Base Rate		Section 4.1 - FT		0.3670	669,775	669,775
25							
26	Total SL to Zone 4			5,145,769		2,061,177	2,061,177
27							
28	**Zone 2 to Zone 4**						
29	FT Contract #	34674		2,309,720			
30	Base Rate		Section 4.1 - FT		0.2780	642,102	642,102
31							
32	Total Zone 2 to Zone 4			2,309,720		642,102	642,102
33							
34	Total SL to Zone 2			12,340,360		3,810,703	3,810,703
35	Total SL to Zone 3			37,430,188		12,677,297	12,677,297
36	Total Zone 1 to Zone 3			0		0	0
37	Total SL to Zone 4			5,145,769		2,061,177	2,061,177
38	Total Zone 2 to Zone 4			2,309,720		642,102	642,102
39							
40	Total Texas Gas			57,226,037		19,191,279	19,191,279
41							
42							
43	Total Texas Gas Area Non-Commodity					19,191,279	19,191,279

Atmos Energy Corporation
Expected Gas Cost (EGC) Calculation
Tennessee Gas Pipeline - Non-Commodity

		(a)	(b)	(c)	(d)	(e)
					Non-Commodity	
Line No.	**Description**	**Tariff Sheet No.**	**Annual Units**	**Rate**	**Total**	**Demand**
			MMbtu	$/MMbtu	$	$
1	**0 to Zone 2**					
2	FT-G Contract # 2546		145,000			
3	Base Rate	23		15.5759	2,258,506	2,258,506
4						
5	FT-A Contract # 95033		144,000			
6	Base Rate	14		15.5759	2,242,930	2,242,930
7						
8	Total Zone 0 to 2		289,000		4,501,436	4,501,436
9						
10	**1 to Zone 2**					
11	FT-A Contract # 300264		7,500			
12	Base Rate	14		10.5774	79,331	79,331
13						
14	Total Zone 1 to 2		7,500		79,331	79,331
15						
16	**Gas Storage**					
17	Production Area:					
18	Demand	61	34,968	2.0334	71,104	71,104
19	Space Charge	61	4,916,148	0.0207	101,764	101,764
20	Market Area:					
21	Demand	61	237,408	1.4938	354,640	354,640
22	Space Charge	61	10,846,308	0.0205	222,349	222,349
23	Total Storage		16,034,832		749,857	749,857
24						
25	Total Tennessee Gas Area FT-G Non-Commodity				5,330,624	5,330,624

Atmos Energy Corporation
Expected Gas Cost (EGC) Calculation
Texas Gas Transmission - Commodity Purchases

Line No.	Description	(a) Tariff Sheet No.	(b)	(c) Purchases Mcf	(d) Purchases MMbtu	(e) Rate $/MMbtu	(f) Total $
1	No Notice Service				1,104,860		
2	Indexed Gas Cost					3.4240	3,783,040
3	Commodity (Zone 3)	Section 4.4 - NNS				0.0490	54,138
4	Fuel and Loss Retention @	Section 4.18.1	0.39%			0.0134	14,805
5						3.4864	3,851,983
6							
7	Firm Transportation				903,976		
8	Indexed Gas Cost					3.4240	3,095,215
9	Base (Weighted on MDQs)					0.0442	39,956
10	ACA	Section 4.1 - FT				0.0013	1,175
11	Fuel and Loss Retention @	Section 4.18.1	0.39%			0.0134	12,113
12						3.4829	3,148,459
13	No Notice Storage						
14	Net (Injections)/Withdrawals						
15	Withdrawals				2,089,383	2.7040	5,649,692
16	Injections				0	3.4240	0
17	Commodity (Zone 3)	Section 4.4 - NNS				0.0490	102,380
18	Fuel and Loss Retention @	Section 4.18.1	0.39%			0.0134	27,998
19					2,089,383	2.7664	5,780,070
20							
21							
22	Total Purchases in Texas Area				4,098,219	3.1186	12,780,512
23							
24							

Line No.	Description	Tariff Sheet No.	Annualized MDQs in MMbtu	Allocation	Commodity Charge $/MMbtu		Weighted Average
25	Used to allocate transportation non-commodity						
26							
27							
28							
29	Texas Gas						
30	SL to Zone 2	Section 4.1 - FT	12,340,360	21.56%	$0.0399	$	0.0086
31	SL to Zone 3	Section 4.1 - FT	37,430,188	65.41%	0.0445	$	0.0291
32	1 to Zone 3	Section 4.1 - FT	0	0.00%	0.0422	$	-
33	SL to Zone 4	Section 4.1 - FT	5,145,769	8.99%	0.0528	$	0.0047
34	2 to Zone 4	Section 4.1 - FT	2,309,720	4.04%	0.0446	$	0.0018
35	Total		57,226,037	100.0%		$	0.0442
36							
37	Tennessee Gas						
38	0 to Zone 2	24	289,000	97.47%	$0.0167	$	0.0163
39	1 to Zone 2	24	7,500	2.53%	0.0087		0.0002
40	Total		296,500	100.00%		$	0.0165

Atmos Energy Corporation
Expected Gas Cost (EGC) Calculation
Tennessee Gas Pipeline - Commodity Purchases

		(a)	(b)	(c)	(d)	(e)	(f)
Line No.	**Description**	**Tariff Sheet No.**		**Purchases**		**Rate**	**Total**
				Mcf	MMbtu	$/MMbtu	$
1	FT-A and FT-G				108,202		
2	Indexed Gas Cost					3.4240	370,484
3	Base Commodity (Weighted on MDQs)					0.0165	1,785
4	ACA	24				0.0013	141
5	Fuel and Loss Retention	32	1.80%			0.0628	6,795
6						3.5046	379,205
7							
8	FT-GS				0		
9	Indexed Gas Cost					3.4240	0
10	Base Rate	26				0.8697	0
11	ACA	24				0.0013	0
12	Fuel and Loss Retention	32	1.80%			0.0628	0
13						4.3578	0
14							
15	Gas Storage						
16	FT-A & FT-G Market Area Withdrawals				774,887	2.7040	2,095,294
17	FT-A & FT-G Market Area Injections				0	3.4240	0
18	Withdrawal Rate	61				0.0087	6,742
19	Injection Rate	61				0.0087	0
20	Fuel and Loss Retention	61	1.37%			0.0001	77
21	Total				774,887	2.7128	2,102,113
22							
23							
24							
25	Total Tennessee Gas Zones				883,089	2.8098	2,481,318

Atmos Energy Corporation
Expected Gas Cost (EGC) Calculation
Trunkline Gas Company

Commodity

		(a)	(b)	(c)	(d)	(e)	(f)
Line No.	**Description**	**Tariff Sheet No.**		**Purchases**		**Rate**	**Total**
				Mcf	MMbtu	$/MMbtu	$
1	Firm Transportation						
2	Expected Volumes				215,000		
3	Indexed Gas Cost					3.4240	736,160
4	Base Commodity	13				0.0051	1,097
5	ACA	13				0.0013	280
6	Fuel and Loss Retention	13	0.71%			0.0210	4,515
7						3.4514	742,052
8							
9							

Non-Commodity

		(a)	(b)	(c)	(d)	(e)
				Non-Commodity		
Line No.	**Description**	**Tariff Sheet No.**	**Annual Units**	**Rate**	**Total**	**Demand**
			MMbtu	$/MMbtu	$	$
	Injections					
10	FT-G Contract # 014573		33,750			
11	Discount Rate on MDQs			5.3776	181,494	181,494
12						
13	Total Trunkline Area Non-Commodity				181,494	181,494

Atmos Energy Corporation
Expected Gas Cost (EGC) Calculation
Demand Charge Calculation

Line No.		(a)	(b)	(c)	(d)	(e)
1	Total Demand Cost:					
2	Texas Gas Transmission	$19,191,279				
3	Midwestern	0				
4	Tennessee Gas Pipeline	5,330,624				
5	Trunkline Gas Company	181,494				
6	Total	$24,703,397				
7						
8			Allocated	Related	Monthly Demand Charge	
9	Demand Cost Allocation:	Factors	Demand	Volumes	Firm	Interruptible
10	All	0.1524	$3,764,798	17,494,254	0.2152	0.2152
11	Firm	0.8476	20,938,599	17,208,968	1.2167	
12	Total	1.0000	$24,703,397		1.4319	0.2152
13						
14			Volumetric Basis for			
15		Annualized	Monthly Demand Charge			
16		Mcf @14.65	All	Firm		
17	Firm Service					
18	Sales:					
19	G-1	17,208,968	17,208,968	17,208,968	1.4319	
20						
21	Interruptible Service					
22	Sales:					
23	G-2	285,286	285,286		1.4319	0.2152
24						
25	Transportation Service					
26	T-3 & T-4	29,492,463				
27						
28		46,986,717	17,494,254	17,208,968		
29						
30						

Atmos Energy Corporation
Expected Gas Cost (EGC) Calculation
Commodity - Total System

Line No.	Description		(a) Purchases Mcf	(b) MMbtu	(c) Rate $/Mcf	(d) Total $
1	**Texas Gas Area**					
2	No Notice Service		1,046,269	1,104,860	3.6816	3,851,983
3	Firm Transportation		856,038	903,976	3.6779	3,148,459
4	No Notice Storage		2,089,383	2,089,383	2.7664	5,780,070
5	Total Texas Gas Area		3,991,690	4,098,219	3.2018	12,780,512
6						
7	**Tennessee Gas Area**					
8	FT-A and FT-G		101,684	108,202	3.7292	379,205
9	FT-GS		0	0	0.0000	0
10	Gas Storage					
11	Injections		0	0	0.0000	0
12	Withdrawals		728,209	774,887	2.8867	2,102,113
13			829,893	883,089	2.9899	2,481,318
14	**Trunkline Gas Area**					
15	Firm Transportation		215,000	215,000	3.4514	742,052
16						
17	**Company Owned Storage**					
18	Withdrawals		1,597,041	1,686,475	2.7664	4,418,055
19	Injections				2.7664	0
20	Net WKG Storage		1,597,041	1,686,475	2.7664	4,418,055
21						
22						
23	Local Production		8,960	9,462	3.4240	30,679
24						
25						
26						
27	Total Commodity Purchases		6,642,584	6,892,245	3.0790	20,452,616
28						
29	Lost & Unaccounted for @	1.61%	106,945	110,965		
30						
31	Total Deliveries		6,535,639	6,781,280	3.1294	20,452,616
32						
33						
34						
35	Total Expected Commodity Cost		6,535,639	6,781,280	3.1294	20,452,616
36						
37						
38	Note: Column (c) is calculated by dividing column (d) by column (a)					
39						

Atmos Energy Corporation
Expected Gas Cost (EGC) Calculation
Load Factor Calculation for Demand Allocation

Line No.	Description	MCF	
	Annualized Volumes Subject to Demand Charges		
1	Sales Volume	17,494,254	
2	Transportation	0	
3	Total Mcf Billed Demand Charges	17,494,254	
4	Divided by: Days/Year	365	
5	Average Daily Sales and Transport Volumes	47,929	
6			
7	Peak Day Sales and Transportation Volume		
8	Estimated total company firm requirements for 5 degree average		
9	temperature days from Peak Day Book - with adjustments per rate filing	314,559	Mcf/Peak Day
10			
11			
12	New Load Factor (line 5 / line 9)	**0.1524**	
13			

Atmos Energy Corporation

Basis for Indexed Gas Cost

For the Quarter ending October 31, 2017

The projected commodity price was provided by the Gas Supply Department and was based upon the following:

A. The Gas Supply Department reviewed the NYMEX futures close prices for the quarter of November 2017 through January 2018 during the period September 11 through September 22, 2017.

		Nov-17 ($/MMBTU)	Dec-17 ($/MMBTU)	Jan-18 ($/MMBTU)
Monday	09/11/17	3.019	3.178	3.289
Tuesday	09/12/17	3.067	3.221	3.329
Wednesday	09/13/17	3.118	3.266	3.369
Thursday	09/14/17	3.127	3.271	3.371
Friday	09/15/17	3.085	3.236	3.340
Monday	09/18/17	3.195	3.337	3.436
Tuesday	09/19/17	3.175	3.319	3.419
Wednesday	09/20/17	3.149	3.291	3.392
Thursday	09/21/17	3.007	3.163	3.270
Friday	09/22/17	3.021	3.180	3.289
Average		$3.096	$3.246	$3.350

B. The Company believes prices are increasing and prices for the quarter ending January 31, 2018 will settle at $3.424 per MMBTU (based on the average of the past ten days) for the period that the GCA is to become effective.

In support of Item B, a worksheet entitled "Estimated Weighted Average Cost of Gas" has been filed under a Petition for Confidentiality in this Case.

Atmos Energy Corporation
Estimated Weighted Average Cost of Gas
For the Quarter ending October 31, 2017

	November-17			December-17			January-18			Total		
	Volumes	Rate	Value	Volumes	Rate	Value	Volumes	Rate	Value	Volumes	Rate	Value
Texas Gas												
Trunkline												
Tennessee Gas												
TX Gas Storage												
TN Gas Storage												
WKG Storage												
Midwestern												
WACOGs												

(This information has been filed under a Petition for Confidentiality)

Atmos Energy Corporation
Correction Factor (CF)
For the Three Months Ended July 2017
2017-00000

Line No.	(a) Month	(b) Actual Purchased Volume (Mcf)	(c) Recoverable Gas Cost	(d) Actual GCA Recovered Gas Cost	(e) Under (Over) Recovery Amount	(f) Adjustments	(g) Total
1	May-17	912,733	$3,604,184.26	$2,941,129.01	$663,055.25	$0.00	$663,055.25
2							
3	June-17	212,405	$2,692,104.19	$2,340,266.47	$351,837.72	$0.00	$351,837.72
4							
5	July-17	349,518	$2,502,741.51	$1,609,953.37	$892,788.14	$0.00	$892,788.14
6							
7	Total Gas Cost						
8	Under/(Over) Recovery		$8,799,029.96	$6,891,348.85	$1,907,681.11	$0.00	$1,907,681.11
9							
10	PBR Savings reflected in Gas Costs		$1,011,913.00				

Line No.			
11			
12	Correction Factor - Part 1		
13	(Over)/Under Recovered Gas Cost through April 2017 (May 2017 GL)	1,487,248.68	
14	Total Gas Cost Under/(Over) Recovery for the three months ended July 2017	1,907,681.11	
15	Recovery from outstanding Correction Factor (CF)	(273,771.93)	
16	Over-Refunded Amount of Pipeline Refunds	0.00	
17	(Over)/Under Recovered Gas Cost through July 2017 (August 2017 GL) (a)	$3,121,157.86	
18	Divided By: Total Expected Customer Sales (b)	17,494,254	Mcf
19			
20	Correction Factor - Part 1	**$0.1784**	/ Mcf
21			
22	Correction Factor - Part 2		
23	Net Uncollectible Gas Cost through November 2015 (c)	56,405.83	
24	Divided By: Total Expected Customer Sales (b)	17,494,254	
25			
26	Correction Factor - Part 2	**$0.0032**	/ Mcf
27			
28	Correction Factor - Total (CF)		
29	Total Deferred Balance through July 2017 (August 2017 GL) incl. Net Uncol Gas Cost	$3,177,563.69	
30	Divided By: Total Expected Customer Sales (b)	17,494,254	
31			
32	**Correction Factor - Total (CF)**	**$0.1816**	/ Mcf
33			

Atmos Energy Corporation
Recoverable Gas Cost Calculation
For the Three Months Ended July 2017
2017-00000

Line No.	Description	Unit	June-17 (a) Month May-17	July-17 (b) Month June-17	August-17 (c) Month July-17
		GL			
1	**Supply Volume**				
2	Pipelines:				
3	Texas Gas Transmission [1]	Mcf	0	0	0
4	Tennessee Gas Pipeline [1]	Mcf	0	0	0
5	Trunkline Gas Company [1]	Mcf	0	0	0
6	Midwestern Pipeline [1]	Mcf	0	0	0
7	**Total Pipeline Supply**	Mcf	0	0	0
8	Total Other Suppliers	Mcf	1,342,861	1,725,750	1,405,385
9	Off System Storage				
10	Texas Gas Transmission	Mcf	0	0	0
11	Tennessee Gas Pipeline	Mcf	0	0	0
12	System Storage				
13	Withdrawals	Mcf	1,167	0	77
14	Injections	Mcf	(531,564)	(516,234)	(471,200)
15	Producers	Mcf	9,678	(18,830)	(14,138)
16	Third Party Reimbursements	Mcf	(36)	(21)	(38)
17	Pipeline Imbalances cashed out	Mcf			
18	System Imbalances [2]	Mcf	90,627	(978,260)	(570,568)
19	**Total Supply**	Mcf	912,733	212,405	349,518
20					
21	Change in Unbilled	Mcf			
22	Company Use	Mcf	0	0	0
23	Unaccounted For	Mcf	0	0	0
24	**Total Purchases**	Mcf	912,733	212,405	349,518

[1] Includes settlement of historical imbalances and prepaid items.

[2] Includes Texas Gas No-Notice Service volumes and monthly imbalances related to transportation customer activities.

Atmos Energy Corporation
Recoverable Gas Cost Calculation
For the Three Months Ended July 2017
2017-00000

Line No.	Description	Unit	GL June-17 (a) Month May-17	GL July-17 (b) Month June-17	GL August-17 (c) Month July-17
1	**Supply Cost**				
2	Pipelines:				
3	Texas Gas Transmission [1]	$	1,283,361	1,234,387	1,269,120
4	Tennessee Gas Pipeline [1]	$	210,732	202,474	201,824
5	Trunkline Gas Company [1]	$	6,875	6,652	6,875
6	Twin Eagle Resource Management	$	0	0	0
7	Midwestern Pipeline [1]	$	0	0	0
8	**Total Pipeline Supply**	$	1,500,968	1,443,514	1,477,819
9	Total Other Suppliers	$	4,135,046	5,435,159	4,157,704
10	Hedging Settlements	$	0	0	0
11	Off System Storage				
12	Texas Gas Transmission	$			
13	Tennessee Gas Pipeline	$			
14	WKG Storage	$	161,659	161,659	161,659
15	System Storage				
16	Withdrawals	$	10,009	0	248
17	Injections	$	(1,635,911)	(1,657,465)	(1,422,930)
18	Producers	$	4,693	6,711	6,637
19	Third Party Reimbursements	$	(783)	(269)	(838)
20	Pipeline Imbalances cashed out	$			
21	System Imbalances [2]	$	(571,496)	(2,697,205)	(1,877,558)
22	**Sub-Total**	$	3,604,184	2,692,104	2,502,742
23	Pipeline Refund + Interest				
24	Change in Unbilled	$			
25	Company Use	$			
26	Recovered thru Transportation	$			
27	**Total Recoverable Gas Cost**	$	3,604,184.26	2,692,104.19	2,502,741.51

[1] Includes demand charges, cost of settlement of historical imbalances and prepaid items.

[2] Includes Texas Gas No-Notice Service volumes and monthly imbalances related to transportation customer activities.

Atmos Energy Corporation
Recovery from Correction Factors (CF)
For the Three Months Ended July 2017
2017-00000

Line No.	Month	Type of Sales	(a) Mcf Sold	(b) CF Rate	(c) CF Amounts	(d) RF Rate	(e) RF Amounts	(f) PBR Rate	(g) PBRRF Amounts	(h) EGC Rate	(i) EGC Recovery Amounts	(j) Total Recoveries	
1	May-17	G-1 Sales	575,855.862	$0.2109	$121,448.00	$0.0000	$0.00	$0.1719	$98,989.62	$4.6001	$2,648,994.55	$2,869,432.17	
2		G-2 Sales	15,684.565	$0.2109	3,307.87	$0.0000	0.00	$0.1719	2,696.18	$3.3844	53,082.84	$59,086.89	
6		Sub Total	591,540.426		$124,755.87		$0.00		$101,685.80		$2,702,077.39	$2,928,519.06	
7		Timing: Cycle Billing and PPA's	0.000		(7,165.24)		(8.12)		13,005.77		239,051.62	$244,884.03	
8		Total	591,540.426		$117,590.63		($8.12)		$114,691.57		$2,941,129.01	$3,173,403.09	$3,058,719.64
9													
10													
11	June-17	G-1 Sales	399,719.260	$0.2109	$84,300.79	$0.0000	$0.00	$0.1719	$68,711.74	$4.7652	$1,904,742.22	$2,057,754.75	
12		G-2 Sales	9,100.885	$0.2109	1,919.38	$0.0000	0.00	$0.1719	1,564.44	$3.5495	32,303.59	$35,787.41	
16		Sub Total	408,820.145		$86,220.17		$0.00		$70,276.18		$1,937,045.81	$2,093,542.16	
17		Timing: Cycle Billing and PPA's	0.000		1,099.62		(0.63)		18,625.24		403,220.66	$422,944.89	
18		Total	408,820.145		$87,319.79		($0.63)		$88,901.42		$2,340,266.47	$2,516,487.05	$2,427,586.26
19													
20													
21	July-17	G-1 Sales	320,870.869	$0.2109	$67,671.67	$0.0000	$0.00	$0.1719	$55,157.70	$4.7652	$1,529,013.86	$1,651,843.23	
22		G-2 Sales	3,919.945	$0.2109	826.72	$0.0000	0.00	$0.1719	673.84	$3.5495	13,913.85	$15,414.41	
26		Sub Total	324,790.814		$68,498.39		$0.00		$55,831.54		$1,542,927.71	$1,667,257.64	
27		Timing: Cycle Billing and PPA's	0.000		363.12		0.00		2,606.95		67,025.66	$69,995.73	
28		Total	324,790.814		$68,861.51		$0.00		$58,438.49		$1,609,953.37	$1,737,253.37	$1,678,814.88
29													
30													
31	Total Recovery from Correction Factor (CF)				$273,771.93								
32	Total Amount Refunded through the Refund Factor (RF)						($8.75)						
33	Total Recovery from Performance Based Rate Recovery Factor (PBRRF)								$262,031.48				
34	Total Recoveries from Expected Gas Cost (EGC) Factor										$6,891,348.85		
35	Total Recoveries from Gas Cost Adjustment Factor (GCA)											$7,427,143.51	
36													
37													$7,165,120.78

38 **NOTE: The cycle billing is a result of customers being billed by the meter read date.**
39 **The prior period adjustments (PPA's) consist of billing revisions/adjustments.**

Traditional and Other Pipelines

Description	May, 2017		June, 2017		July, 2017	
	MCF	Cost	MCF	Cost	MCF	Cost
Texas Gas Pipeline Area						
LG&E Natural						
Texaco Gas Marketing						
CMS						
WESCO						
Southern Energy Company						
Union Pacific Fuels						
Atmos Energy Marketing, LLC						
Engage						
ERI						
Prepaid						
Reservation						
Hedging Costs - All Zones						
Total	1,142,248	$3,457,737.27	1,419,382	$4,472,177.85	1,146,262	$3,387,835.32
Tennessee Gas Pipeline Area						
Chevron Natural Gas, Inc.						
Atmos Energy Marketing, LLC						
WESCO						
Prepaid						
Reservation						
Fuel Adjustment						
Total	31,045	$90,671.65	30,164	$91,163.88	31,169	$88,858.85
Trunkline Gas Company						
Atmos Energy Marketing, LLC						
Engage						
Prepaid						
Reservation						
Fuel Adjustment						
Total	43	$134.30	3	$8.69	37	$110.38
Midwestern Pipeline						
Atmos Energy Marketing, LLC						
Midwestern Gas Transmission						
Anadarko						
Prepaid						
Reservation						
Fuel Adjustment						
Total	169,525	$586,671.77	202	$612.46	195	$600.15
ANR Pipeline						
Atmos Energy Marketing, LLC						
LG&E Natural						
Anadarko						
Prepaid						
Reservation						
Fuel Adjustment						
Total	0	($168.66)	275,999	$871,196.10	227,722	$680,299.21
All Zones						
Total	1,342,861	$4,135,046.33	1,725,750	$5,435,158.98	1,405,385	$4,157,703.91

**** Detail of Volumes and Prices Has Been Filed Under Petition for Confidentiality ****

Atmos Energy Corporation
Net Uncollectible Gas Cost
Twelve Months Ended November, 2016

Line No.	Month (a)	Gas Cost Written Off (b)	Margin Written Off (c)	Taxes & Other Written Off (d)	Total Written Off (e)	Gas Cost Collected (f)	Margin Collected (g)	Net Uncollectible Gas Cost (h)	Cumulative Net Uncollectible Gas Cost (i)
1	Dec-15	($20,889.60)	($53,343.84)	($3,101.65)	($77,335.09)	$30,790.23	$27,528.82	($9,900.63)	($9,900.63)
2	Jan-16	($5,866.08)	($28,619.13)	($1,356.82)	($35,842.03)	$27,831.20	$21,317.49	($21,965.12)	($31,865.75)
3	Feb-16	($6,501.14)	($30,862.32)	($1,462.01)	($38,825.47)	$24,791.47	$20,570.56	($18,290.33)	($50,156.08)
4	Mar-16	($6,159.39)	($27,492.88)	($1,203.48)	($34,855.75)	$14,605.13	$13,908.62	($8,445.74)	($58,601.82)
5	Apr-16	($11,846.20)	($39,411.75)	($2,019.33)	($53,277.28)	$6,945.88	$7,616.25	$4,900.32	($53,701.50)
6	May-16	($12,850.96)	($31,997.76)	($1,813.28)	($46,662.00)	$5,432.58	$7,152.97	$7,418.38	($46,283.12)
7	Jun-16	($26,739.36)	($42,346.83)	($3,130.06)	($72,216.25)	$5,026.16	$6,060.71	$21,713.20	($24,569.92)
8	Jul-16	($33,970.25)	($49,648.67)	($4,036.02)	($87,654.94)	$10,932.01	$15,622.16	$23,038.24	($1,531.68)
9	Aug-16	($50,143.35)	($74,465.96)	($5,422.05)	($130,031.36)	$7,124.37	$7,758.41	$43,018.98	$41,487.30
10	Sep-16	($28,720.95)	($48,854.43)	($3,517.32)	($81,092.70)	$6,877.39	$7,163.01	$21,843.56	$63,330.86
11	Oct-16	($18,774.25)	($42,651.65)	($2,572.41)	($63,998.31)	$11,801.45	$11,423.46	$6,972.80	$70,303.66
12	Nov-16	($6,682.85)	($34,046.70)	($1,703.62)	($42,433.17)	$20,580.68	$19,225.98	($13,897.83)	$56,405.83

Atmos Energy Corporation
Refund Factor
Case No. 2016-00129
(RF)

Line No.	Amounts Reported:		(1) Demand	(2) Commodity	(3) Total	AMOUNT
1	Tennessee Gas Pipeline Rate Case Refund, Docket No. RP11-1566					$ -
2						
3	Carryover from Case No. 2015-00000					0.00
4	Less: amount related to specific end users					0.00
5	Amount to flow-through					$ -
6						
7	Average of the 3-Month Commercial Paper Rates for the immediately					0.00%
8	preceding 12-month period less 1/2 of 1% to cover the costs of refunding.					
9						
10			(1)	(2)	(3)	
11	**Allocation**		Demand	Commodity	Total	
12						
13	Balance to be Refunded		$0	$ -	$0	
14			0	0	0	
15						
16	Total (w/o interest)		0	0	0	
17	Interest (Line 14 x Line 5)		0	0	0	
18	Total		$0	$0	$0	
19						
20	**Refund Calculation**					
21						
22	Demand Allocator - All					
23	(See Exh. B, p. 8, line 12)	0.1524				
24	Demand Allocator - Firm					
25	(1 - Demand Allocator - All)	0.8476				
26	Firm Volumes (normalized)					
27	(See Exh. B, p. 6, col. 3, line 28)	17,208,968				
28	All Volumes (excluding Transportation)					
29	(See Exh. B, p. 6, col. 2, line 28)	17,494,254				
30						
31	Demand Factor - All	$0	$0.0000	/ MCF		
32	Demand Factor - Firm	$0	$0.0000	/ MCF		
33	Commodity Factor	$0		$ -	/ MCF	
34	Total Demand Firm Factor					
35	(Col. 2, lines 29 - 30)		**$0.0000**	**/ MCF**		
36	Total Demand Interruptible Factor					
37	(Col. 2, line 29)		**$0.0000**	**/ MCF**		
38	Total Firm Sales Factor					
39	(Col. 2, line 31 + col. 1, line 33)			**$ -**	**/ MCF**	

Atmos Energy Corporation Exhibit E
Performance Based Rate Recovery Factor
2017-00000
(PBRRF)

Line No.	Amounts Reported:		AMOUNT
1	Company Share of 11/15-10/16 PBR Activity		$ 2,727,732.37
2	Carry-over Amount in Case No. 2016-00XXX		$279,828.77
3			-
4	Total		$ 3,007,561.14
5			
6			
7	Total		$ 3,007,561.14
8	Less: Amount related to specific end users		0.00
9	Amount to flow-through		$ 3,007,561.14
10			
11			
12			
13	**Allocation**	**Total**	
14			
15	Company share of PBR activity	$ 3,007,561.14	
16			
17	**PBR Calculation**		
18			
19	Demand Allocator - All		
20	(See Exh. B, p. 6, line 10)	0.1524	
21	Demand Allocator - Firm		
22	(1 - Demand Allocator - All)	0.8476	
23	Firm Volumes (normalized)		
24	(See Exh. B, p. 6, col. (a), line 19)	17,208,968	
25	All Volumes (excluding Transportation)		
26	(See Exh. B, p. 6, col. (b), line 28)	17,494,254	
27			
28			
29	Total Sales Factor (Line 15 / Line 26)	**$ 0.1719 / MCF**	
30			
31	Total Interruptible Sales Factor (Line 29)	**$ 0.1719 / MCF**	

Atmos Energy Corporation
Performance Based Rate Recovery - Residual Balance Calculation
Carry-over Amount in Case No.

EXHIBIT E
Workpaper 1

Company Share of 11/14-10/15 PBR Activity	2,870,080.42
Carry-over Amount in Case No. 2014-00478	(93,722.12)
Balance Filed in Case No.	2,776,358.30

Line No.	Month (a)	Sales (b)	PBRRF (c)	PBR Recoveries (d)	PBR Recovery Adjustments (e)	Total PBR Recoveries (d) + (e) = (f)	Balance Prior (g) - (f) = (g)
1							
2	Balance Forward (from above)						$ 2,776,358.30
3	Feb-15	3,312,974	$0.1527	$505,891.15	$7,727.27	513,618.42	2,262,739.88
4	Mar-15	3,442,457	0.1527	525,663.25	$4,595.18	530,258.43	1,732,481.45
5	Apr-15	1,384,846	0.1527	211,466.05	$4,264.87	215,730.92	1,516,750.53
6	May-15	618,657	0.1527	94,468.98	$4,335.04	98,804.02	1,417,946.51
7	Jun-15	412,463	0.1527	62,983.09	$4,986.33	67,969.42	1,349,977.09
8	Jul-15	340,133	0.1527	51,938.37	$4,011.85	55,950.22	1,294,026.87
9	Aug-15	397,052	0.1527	60,629.77	$3,559.90	64,189.67	1,229,837.20
10	Sep-15	378,476	0.1527	57,793.31	$1,299.63	59,092.94	1,170,744.26
11	Oct-15	529,996	0.1527	80,930.39	$2.63	80,933.02	1,089,811.24
12	Nov-15	852,324	0.1527	130,149.81	$142.97	130,292.78	959,518.46
13	Dec-15	1,683,702	0.1527	257,101.31	$2,096.66	259,197.97	700,320.49
14	Jan-16	2,733,212	0.1527	417,361.43	$3,130.29	420,491.72	279,828.77
15							
16	Total	16,086,293		$2,456,376.91	$40,152.62	$2,496,529.53	$279,828.77

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SEP 29 2017

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:

GAS COST ADJUSTMENT	)	**CASE NO.**
FILING OF	)	**2017-00000**
ATMOS ENERGY CORPORATION	)	

PETITION FOR CONFIDENTIALITY OF INFORMATION BEING FILED WITH THE KENTUCKY PUBLIC SERVICE COMMISSION

Atmos Energy Corporation ("Atmos") respectfully petitions the Kentucky Public Service Commission ("Commission") pursuant to 807 KAR 5:001 Section 13 for confidential treatment of the information which is described below and which is attached hereto. In support of this Petition, Atmos states as follows:

1. Atmos is filing its Gas Cost Adjustment ("GCA") for the quarterly period commencing on November 1, 2017 through December 31, 2017. This GCA filing contains a change to Atmos' Correction Factor (CF) as well as information pertaining to Atmos' projected gas prices. The following two attachments contain information which requires confidential treatment.

   a. The attached Exhibit D, Page 5 of 6 contains confidential information from which the actual price being paid by Atmos for natural gas to its supplier can be determined.

   b. The attached Weighted Average Cost of Gas ("WACOG") schedule in support of Exhibit C, Page 2 of 2 contains confidential information pertaining to prices projected to be paid by Atmos for purchase contracts.

2. Information of the type described above has previously been filed by Atmos with the Commission under petitions for confidentiality. The Commission has consistently granted confidential protection to that type of information in each of the prior GCA filings since KPSC Case No. 1999-070.

3. All of the information sought to be protected herein as confidential, if publicly disclosed, would have serious adverse consequences to Atmos and its customers. Public disclosure of this information would impose an unfair commercial disadvantage on Atmos. Atmos has successfully negotiated an extremely advantageous gas supply contract that is very beneficial to Atmos and its ratepayers. Detailed information concerning that contract, including commodity costs, demand and transportation charges, reservations fees, etc. on specifically identified pipelines, if made available to Atmos' competitors, (including specifically non-regulated gas marketers), would clearly put Atmos to an unfair commercial disadvantage. Those competitors for gas supply would be able to gain information that is otherwise confidential about Atmos' gas purchases and transportation costs and strategies. The Commission has accordingly granted confidential protection to such information.

4. Likewise, the information contained in the WACOG schedule in support of Exhibit C, Page 2 of 2, also constitutes sensitive, proprietary information which if publicly disclosed would put Atmos to an unfair commercial disadvantage in future negotiations.

5. Atmos would not, as a matter of company policy, disclose any of the information for which confidential protection is sought herein to any person or entity, except as required by law or pursuant to a court order or subpoena. Atmos' internal practices and policies are directed towards non-disclosure of the attached information. In fact, the information contained in the

attached report is not disclosed to any personnel of Atmos except those who need to know in order to discharge their responsibility. Atmos has never disclosed such information publicly. This information is not customarily disclosed to the public and is generally recognized as confidential and proprietary in the industry.

6. There is no significant interest in public disclosure of the attached information. Any public interest in favor of disclosure of the information is out weighed by the competitive interest in keeping the information confidential.

7. The attached information is also entitled to confidential treatment because it constitutes a trade secret under the two prong test of KRS 265.880: (a) the economic value of the information as derived by not being readily ascertainable by other persons who might obtain economic value by its disclosure; and, (b) the information is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. The economic value of the information is derived by Atmos maintaining the confidentiality of the information since competitors and entities with whom Atmos transacts business could obtain economic value by its disclosure.

8. The attached information is, for the reasons set forth above, entitled to confidential protection under KRS 61.878.

9. The attached information should be treated as confidential for an indefinite period because its competitively sensitive nature will last for an indefinite period.

WHEREFORE, Atmos petitions the Commission to treat as confidential all of the material and information which is included in the attached one volume marked "Confidential".

Respectfully submitted this __th day of September, 2017.

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