

November 29, 2018

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

## RECEIVED

NOV 3 0 2018

PUBLIC SERVICE COMMISSION

#### Re: Case No. 2018-00398

Dear Ms. Pinson:

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.

Due to the recent unexpected increases in the commodity cost of gas, the GCA rates submitted in our previous GCA will not be sufficient to adequately recover gas costs. We are filing an interim GCA (out of the normal quarterly cycle) so that we can account for the increase in cost.

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

## RECEIVED

#### COMMONWEALTH OF KENTUCKY BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

NOV 3 0 2018

PUBLIC SERVICE COMMISSION

In the Matter of:

GAS COST ADJUSTMENT	)	CASE NO.
FILING OF	)	<b>2018-00</b> 398
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) and KRS 61.878(1)(c)1 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 period commencing on January 1, 2019 through January 31, 2019. This GCA filing contains information pertaining to Atmos' projected gas prices. The following attachment contains information which requires confidential treatment.

> a. 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 in KPSC Case No. 2015-00343. The information contained in the attached WACOG schedule has also been filed with the Commission under a Petition for Confidentiality in Case No. 2015-00424.

3. KRS 61.878 (1)(c) 1. provides that "...records confidentially disclosed to an agency or required by any agency to be disclosed to it, generally recognized as confidential or proprietary, which is openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records..."shall remain confidential unless otherwise ordered by a court of competent jurisdiction. The natural gas industry is very competitive. Atmos Energy has active competitors, who could use this information to their advantage and to the direct disadvantage of Atmos.

All of the information sought to be protected 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.

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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 outweighed 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 365.880: (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.

Pursuant to 807 KAR 5:001 (13) confidentiality of the attached information
 should be maintained indefinitely. The statutes cited above do not allow for disclosure at any
 time. Given the competitive nature of the natural gas business and the efforts of non-regulated

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competitors to encroach upon traditional markets, it is imperative that regulated information remain protected and that the integrity of the information remain secure.

For these reasons, Atmos Energy requests that the items identified in this petition be treated as confidential. Should the Commission determine that some or all of the material is not to be given confidential protection, Atmos Energy requests a hearing prior to any public release of the information to preserve its rights to notice of the grounds for the denial and to preserve its right of appeal of the decision.

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

Respectfully submitted this  $\frac{27}{2}$  day of November 2018.

Mark R. Hutchinson 611 Frederica Street Owensboro, Kentucky 42301 randy@whplawfirm.com

John N. Hughes 124 W. Todd Street Frankfort, Kentucky 40601 jnhughes@johnhughespsc.com

Attorneys for Atmos Energy Corporation

### COMMONWEALTH OF KENTUCKY BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

## RECEIVED

NOV 3 0 2018

PUBLIC SERVICE COMMISSION

In the Matter of:

GAS COST ADJUSTMENT ) FILING OF ) ATMOS ENERGY CORPORATION )

#### NOTICE

INTERIM FILING

For The Period

January 1, 2019 - January 31, 2019

Attorney for Applicant

Mark R. Hutchinson 611 Frederica Street Owensboro, Kentucky 42301

Case No. 2018-00000

November 29, 2018

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 Twenty-Fifth Revised Sheet No. 4, Twenty-Fifth Revised Sheet No. 5, and Twenty-Fifth Revised Sheet No. 6 to its PSC No. 2, <u>Rates, Rules and Regulations for</u> <u>Furnishing Natural Gas</u> to become effective January 1, 2019.

The Gas Cost Adjustment (GCA) for firm sales service is \$5.2617 per Mcf and \$3.9537 per Mcf for interruptible sales service. The supporting calculations for the Twenty-Fifth 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)

Since the Company's last GCA filing, Case No. 2018-00337, the following changes have occurred in its pipeline and gas supply commodity rates for the GCA period.

- The commodity rates per Mcf used are based on historical estimates and/or current data for the period of January 1, 2019 through January 31, 2019, as shown in Exhibit C, page 1 of 2.
- 2. The G-1 Expected Gas Cost will be approximately \$5.3614 per Mcf for the period of January 1, 2019 through January 31, 2019, as compared to \$4.4228 per Mcf for the period of November 01, 2018 through December 31 2018. The G-2 Expected Gas Cost will be approximately \$4.0534 for the period of January 1, 2019 through January 31, 2019, as compared to \$3.1148 for the period of November 01, 2018 through December 31 2018.

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 Twenty-Fifth Revised Sheet No. 5; and Twenty-Fifth 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 January 1, 2019.

DATED at Dallas, Texas this 29th Day of November, 2018.

#### ATMOS ENERGY CORPORATION

By:

Anthony Croissant Sr. Rate Administration Analyst Atmos Energy Corporation

FOR ENTIRE SERVICE AREA

P.S.C. KY NO. 2

#### TWENTY-FIFTH REVISED SHEET NO. 4

# ATMOS ENERGY CORPORATION NAME OF UTILITY

#### CANCELLING

#### TWENTY-FOURTH REVISED SHEET NO. 4

	Current Rate Su Case No. 2018-		
Firm Service Base Charge: Residential (G-1) Non-Residential (G- Transportation (T-4) Transportation Administration Rate per Mcf <sup>2</sup> First 300 <sup>1</sup> Mct	1) - 44.50 - 375.00 Fee - 50.00 <u>Sales (G-1)</u>	<ul> <li>per meter per month</li> <li>per meter per month</li> <li>per delivery point per month</li> <li>per customer per meter</li> <li><u>Transportation (T-4)</u></li> <li>0 1.7250 per Mcf</li> </ul>	(,
Next         14,700         1         Mcl           Over         15,000         Mcl         Mcl		@ 0.9600 per Mcf @ 0.7700 per Mcf	(I, (I,
Base Charge Transportation Administration Rate per Mcf <sup>2</sup>	Fee - 50.00	per delivery point per month per customer per meter	
First 15,000 <sup>1</sup> Mcf Over 15,000 Mcf	Sales (G-2) @ 4.8087 per Mcf @ 4.5887 per Mcf	Transportation (T-3)           @         0.8550 per Mcf           @         0.6350 per Mcf	(1,
		е. 0.0330 рел місі	(1,
considered for the p been achieved.	the customer (sales, transportation; irpose of determining whether the vo Riders may also apply, where applic	lume requirement of 15,000 Mcf has	

.

DATE OF IS:	SUE November 29, 2018						
	MONTH / DATE / YEAR						
DATE EFFE	CTIVE January 1, 2019						
	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	2018-0000 DATED N/A						

#### FOR ENTIRE SERVICE AREA

#### **P.S.C. KY NO. 2**

#### **TWENTY-FIFTH REVISED SHEET NO. 5**

#### CANCELLING

ATMOS ENERGY CORPORATION NAME OF UTILITY

#### **TWENTY-FOURTH REVISED SHEET NO. 5**

	as Cost Adjustments se No. 2018-0000		
Applicable			
For all Mcf billed under General Sales Servio	ce (G-1) and Interruptible Sa	les Service (G-2).	
Gas Charge = GCA			
GCA = EGC + CF + RF + P	BRRF		
Gas Cost Adjustment Components	<u> </u>	<u> </u>	
EGC (Expected Gas Cost Component)	5.3614	4.0534	(1,
CF (Correction Factor)	(0.2849)	(0.2849)	(-
RF (Refund Adjustment)	0.0000	0.0000	(-
PBRRF (Performance Based Rate Recovery Factor)	0.1852	0.1852	(-,
GCA (Gas Cost Adjustment)	\$5.2617	\$3.9537	(1,
	· · · · · · · · · · · · · · · · · · ·	·	

DATE OF ISSUE	November 29, 2018	
	MONTH / DATE / YEAR	
DATE EFFECTIVE	January 1, 2019	
	MONTH / DATE / YEAR	
ISSUED BY	/s/ Mark A. Martin	
	SIGNATURE OF OFFICER	
TITLE Vice President -	Rates & Regulatory Affairs	
DV AUTUODITY OF OD	DER OF THE PUBLIC SERVICE CO	
DI AUTHORITI OF ON	DER OF THE FUDLIC SERVICE CO	OMMANOS

IN CASE NO 2018-0000 DATED N/A

#### FOR ENTIRE SERVICE AREA

#### P.S.C. KY NO. 2

#### **TWENTY-FIFTH REVISED SHEET NO. 6**

#### CANCELLING

NAME OF UTILITY

ATMOS ENERGY CORPORATION

#### **TWENTY-FOURTH REVISED SHEET NO. 6**

		(	Current	Transporta	tion	· · · · · · · · · · · · · · · · · · · ·		7
			Case	No. 2018-0000	)			_
The Transportati	on Rates (T-	3 and T-4)	for each	respective serv	rice net monthly ra	ate is as follows	:	
System Lost an	d Unaccoun	ted gas p	ercentag	e:		-2.21%	)	
				Simple Margin	Non- Commodity	Gross Margin	_	
Transportation Firm Serv								
First Next	300 14,700	Mcf Mcf	@ @	\$1.7250 + 0.9600 +	\$0.0000 = 0.0000 =	0.9600	per Mcf per Mcf	
All over	15,000	Mcf	@	0.7700' +	0.0000 =	• 0.7700	per Mcf	
	<u>ole Service (</u>							
First All over	15,000 15,000	Mcf Mcf	0	\$0.8550 + 0.6350 +	\$0.0000 = 0.0000 =		per Mcf per Mcf	
								ľ
<sup>1</sup> Excludes star	ndby sales se	ervice.		1				
					<u> </u>	·		
				·				-
DATE OF ISSUE	<u> </u>	November MONTH / DA		· · · · · ·				
DATE EFFECTIVE		January J MONTH/DA	., 2019 TE/YEAR	<u></u>				
SSUED BY		/s/ Mark A signature o						
ITLE Vice Preside	ent – Rates &	Regulatory	Affairs					
				-				

BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION IN CASE NO 2018-0000 DATED N/A

Atmos Energy Corporation Comparison of Current and Previous Cases Sales Service

					(a)	(b)	(C)
Line					Case		Difference
No.	Description	n			2018-00337 \$/Mcf	2018-0000 \$/Mcf	Difference \$/Mcf
1	<u>G - 1</u>				φ/Ινιζι	φηνισι	\$/IVICI
2	<u> </u>						
3	Distribution	Charge (per	Case No. 2015-003	43)			
4	First		Mcf		1.7250	1.7250	0.0000
5	Next	14,700			0.9600	0.9600	0.0000
6	Over	15,000	Mcf		0.7700	0.7700	0.0000
7							
8		djustment Co					
9		xpected Gas	Cost):				
10	Comm				2.8936	3.8322	0.9386
11	Demar Tetel CC				1.5292	1.5292	0.0000
12	Total EG		r)		4.4228	5.3614	0.9386
13 14		rection Factor und Adjustme			(0.2849) 0.0000	(0.2849) 0.0000	0.0000 0.0000
14			e Based Rate Recov	very Eactor)	0.1852	0.1852	0.0000
16		s Cost Adjust			4.3231	5.2617	0.9386
17	00/1(000	5 0001 / 10j001	nonty		4.0201	0.2017	0.0000
18	Rate per Mo	cf (GCA inclu	ded)				
19	First		Mcf		6.0481	6.9867	0.9386
20	Next	14,700	Mcf		5.2831	6.2217	0.9386
21	Over	15,000	Mcf		5.0931	6.0317	0.9386
22							
23							
24	<u>G - 2</u>						
25							
26			Case No. 2015-003	43)			
27	First	15,000			0.8550	0.8550	0.0000
28	Over	15,000	MCt		0.6350	0.6350	0.0000
29 30	Can Coat A	divistment Co	mananta				
31		djustment Co pected Gas					
32	Comm		0051).		2.8936	3.8322	0.9386
33	Demar				0.2212	0.2212	0.0000
34	Total EG				3.1148	4.0534	0.9386
35		rection Factor	r)		(0.2849)	(0.2849)	0.0000
36	and the second sec	und Adjustme			0.0000	0.0000	0.0000
37			Based Rate Recov	very Factor)	0.1852	0.1852	0.0000
38		S Cost Adjustr			3.0151	3.9537	0.9386
39							
40		cf (GCA inclue					
41	First		Mcf		3.8701	4.8087	0.9386
42	Over	14,700	Mcf		3.6501	4.5887	0.9386
43							
44							
45 47	Refund Fac	CIOF (RF)		Effective			
47			Case No.	Effective	RF		
40			Case NO.	Date	ΝF		
50		1 -	2017-00402	11/1/2017	0.0000		
51		2 -	2018-00233	8/1/2018	0.0000		
52		3 -	2018-00337	11/1/2018	0.0000		
53		4 -	2018-0000	1/1/2019	0.0000		
54							
55	Total Refun	d Factor (RF)	)		\$0.0000		

Atmos Energy Corporation Comparison of Current and Previous Cases Transportation Service

				(-)	(1.)	
				(a)	(b)	(c)
Line				Cas	e No.	
No.	Description			2018-00337	2018-0000	Difference
				\$/Mcf	\$/Mcf	\$/Mcf
1	T -4 Transpo	ortation Serv	vice / Firm Service (High Priority)			
2						
3	Simple Marg	in / Distributio	on Charge (per Case No. 2015-00343)			
4	First	300	Mcf	1.7250	1.7250	0.0000
5	Next	14,700	Mcf	0.9600	0.9600	0.0000
6	Over	15,000	Mcf	0.7700	0.7700	0.0000
7						
8						
9	T - 3 / Interr	uptible Servi	ce (Low Priority)			
10						
11	Simple Marg	in / Distributio	on Charge (per Case No. 2015-00343)			
12	First	15,000	Mcf	0.8550	0.8550	0.0000
13	Over	15,000	Mcf	0.6350	0.6350	0.0000
14		and the state of the state of the state of				

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

		(a)	(b)	(c)	(d) Non-Com	(e) nmodity
Line No. Description		Tariff Sheet No.	Annual Units	Rate	Total	Demand
			MMbtu	\$/MMbtu	\$	\$
1 SL to Zone 2						
2 NNS Contract #	29760		12,340,360	tion of the second second	and and an and a second	
3 Base Rate		Section 4.4 - NNS		0.3088	3,810,703	3,810,703
4 5 Total Cl. to Zana 2			10.040.000		0.010 700	0.010 700
5 Total SL to Zone 2 6			12,340,360		3,810,703	3,810,703
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					-1	-1
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			07 100 100			
17 Total SL to Zone 3			37,430,188		12,677,297	12,677,297
18 19 <u>Zone 1 to Zone 3</u>						
20 STF Contract #	35772	Section 4.2 - STF	776 400			
21 Base Rate	33112	3ection 4.2 - 31F	776,400	0.3282	254,814	254,814
22				0.3202	254,014	234,014
23 STF Contract #	36788	Section 4.2 - STF	90,000			
24 Base Rate	00,00		00,000	0.3282	29,538	29,538
25						201000
26 Total Zone 1 to Zone	3		866,400		284,352	284,352
27						
28 SL to Zone 4						
29 NNS Contract #	29763		3,320,769			
30 Base Rate		Section 4.4 - NNS		0.4190	1,391,402	1,391,402
31 32 FT Contract #	21007		1 005 000			
32 FT Contract # 33 Base Rate	31097	Continue 1.1 ET	1,825,000	0.2070	000 775	000 775
34		Section 4.1 - FT		0.3670	669,775	669,775
38 Total SL to Zone 4		3	5,145,769		2,061,177	2,061,177
39			0,140,700		2,001,177	2,001,177
40 Zone 2 to Zone 4						
41 FT Contract #	34674		2,309,720			
42 Base Rate		Section 4.1 - FT		0.2780	642,102	642,102
43						
44 Total Zone 2 to Zone	4		2,309,720		642,102	642,102
45						
46 Zone 3 to Zone 3	00770		1			
47 FT Contract #	36773	Continu 1.1 FT	1,070,000	0 1 100	450 754	450 754
48 Base Rate 49		Section 4.1 - FT		0.1493	159,751	159,751
50 Total Zone 3 to Zone	3	1	1,070,000		159,751	159,751
51	0		1,070,000		100,701	100,701
52 Total SL to Zone 2			12,340,360		3,810,703	3,810,703
53 Total SL to Zone 3			37,430,188		12,677,297	12,677,297
54 Total Zone 1 to Zone	3		866,400		284,352	284,352
55 Total SL to Zone 4			5,145,769		2,061,177	2,061,177
56 Total Zone 2 to Zone			2,309,720		642,102	642,102
57 Total Zone 3 to Zone	3		1,070,000		159,751	159,751
58 50 Tatal Tana Ora						10.000
59 Total Texas Gas			59,162,437		19,635,382	19,635,382
60 61						
62 Total Texas Gas Area	a Non-Cor	nmodity			19,635,382	19,635,382
52 1 5 cl 1 6 A 6 6 6 6 A 16		·····oury			10,000,002	10,000,002

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

		(a)	(b)	(C)	(d) Non-C	(e) commodity
Line		Tariff	Annual			
No. Description		Sheet No.	Units	Rate	Total	Demand
			MMbtu	\$/MMbtu	\$	\$
1	2546		145 000			
3 Base Rate	2040	23	145,000	15.5759	2,258,506	2,258,506
5 FT-A Contract # 6 Base Rate 7	95033	14	144,000	15.5759	2,242,930	2,242,930
7 8 Total Zone 0 to 2 9			289,000		4,501,436	4,501,436
10 <u><b>1 to Zone 2</b></u> 11 FT-A Contract # 12 Base Rate 13	300264	14	30,000	10.5774	317,322	317,322
14 Total Zone 1 to 2 15			30,000		317,322	317,322
16 <b>Gas Storage</b> 17 Production Area:						
18 Demand		61	34,968	2.0334	71,104	71,104
19 Space Charge 20 Market Area:		61	4,916,148	0.0207	101,764	101,764
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 24			16,034,832		749,857	749,857

25 Total Tennessee Gas Area FT-G Non-Commodity

Exhibit B Page 2 of 8

5,568,615

5,568,615

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

Line		(a) Tariff	(b)	(C)	(d)	(e)		(f)
No.	Description	Sheet No.		Purc	chases	Rate		Total
				Mcf	MMbtu	\$/MMbtu		\$
1	No Notice Service				1,089,103			
2	Indexed Gas Cost					4.4170		4,810,567
3	Commodity (Zone 3)	Section 4.4 - NNS				0.0490		53,366
4	Fuel and Loss Retention @	Section 4.18.1	0.99%			0.0442		48,138
5						4.5102		4,912,071
7	Firm Transportation				891,084			
3	Indexed Gas Cost					4.4170		3,935,919
9	Base (Weighted on MDQs)					0.0443		39,475
0	ACA	Section 4.1 - FT				0.0013		1,158
11	Fuel and Loss Retention @	Section 4.18.1	0.99%			0.0442		39,386
12					-	4.5068		4,015,938
3	No Notice Storage							
14	Net (Injections)/Withdrawals							
5	Withdrawals				735,876	2.5590		1,883,107
6	Injections				0	4.4170		0
7	Commodity (Zone 3)	Section 4.4 - NNS				0.0490		36,058
8	Fuel and Loss Retention @	Section 4.18.1	0.99%	-		0.0442		32,526
9					735,876	2.6522		1,951,691
0								
21	Total Purchases in Texas Area			-	2,716,063	4.0057	1	0,879,700
23	Total Furchases III Texas Area			=	2,710,003	4.0007		0,079,700
24 25	Used to allocate transportation r	on-commodity						
26		ion-commodity			Anna an ing ang ang ang ang ang ang ang ang ang a			
27				Annualized		Commodity		
28				MDQs in		Charge		Veighted
29	Texas Gas			MMbtu	Allocation	\$/MMbtu		Average
0	SL to Zone 2	Section 4.1 - FT		12,340,360	21.24%	\$0.0399	\$	0.0085
31	SL to Zone 3	Section 4.1 - FT		37,430,188	64.43%	0.0445	\$	0.0287
32	1 to Zone 3	Section 4.1 - FT		866,400	1.49%	0.0422	\$	0.0006
33	SL to Zone 4	Section 4.1 - FT		5,145,769	8.86%	0.0528	\$	0.0047
34	2 to Zone 4	Section 4.1 - FT		2,309,720	3.98%	0.0446	\$	0.0018
35	Total			58,092,437	100.0%		\$	0.0443
36	T 0							
37	Tennessee Gas 0 to Zone 2	24		280.000	00 600/	¢0.0107	¢	0.0154
38	1 to Zone 2	24 24		289,000	90.60%	\$0.0167	\$	0.0151
39 10	Total	24	-	<u> </u>	9.40%	0.0087	¢	0.0008
+U	IUIAI			319,000 =	100.00%		\$	0.0159

Expected Gas Cost (EGC) Calculation

Tennessee Gas Pipeline - Commodity Purchases

		(a)	(b)	(c)	(d)	(e)	(f)
Line		Tariff					
No.	Description	Sheet No.		Pu	rchases	Rate	Total
				Mcf	MMbtu	\$/MMbtu	\$
1	FT-A and FT-G				213,045		
2	Indexed Gas Cost					4.4170	941,021
3	Base Commodity (Weighted on MDQs)					0.0159	3,398
4	ACA	24				0.0013	277
5	Fuel and Loss Retention	32	1.92%			0.0865	18,428
6						4.5207	963,124
7							
8	FT-GS				0		
9	Indexed Gas Cost					4.4170	0
10	Base Rate	26				0.8697	0
11	ACA	24				0.0013	0
12	Fuel and Loss Retention	32	1.92%			0.0865	0
13						5.3745	0
14							
15	Gas Storage						
16	FT-A & FT-G Market Area Withdrawals				303,335	2.5590	776,234
17	FT-A & FT-G Market Area Injections				0	4.4170	0
18	Withdrawal Rate	61				0.0087	2,639
19	Injection Rate	61				0.0087	0
20	Fuel and Loss Retention	61	1.51%			0.0001	30
21	Total			_	303,335	2.5678	778,903
22							
23							
24							
25	Total Tennessee Gas Zones				516,380	3.3735	1,742,027

Atmos Energy Corporation Expected Gas Cost (EGC) Calculation Trunkline Gas Company						Exhibit B Page 5 of 8
Commodity	(a)	(b)	(c)	(d)	(e)	(f)
Line No. Description	Tariff Sheet No.		Purc	hases	Rate	Total

				Mcf	MMbtu	\$/MMbtu	\$
1	Firm Transportation						
2					77,500		
3	Indexed Gas Cost					4.4170	342,318
4	Base Commodity	13				0.0051	395
5	ACA	13				0.0013	101
6	Fuel and Loss Retention	13	0.35%			0.0111	860
7						4.4345	343,674
8							

9

### Non-Commodity

	(a)	(b)	(C)	(d)	(e)
			No	on-Commo	dity
Line	Tariff	Annual			
No. Description	Sheet No.	Units	Rate	Total	Demand
		MMbtu	\$/MMbtu	\$	\$
Injections					
10 FT-G Contract # 01	573	33,750			
11 Discount Rate on MDC	5		5.3776	181,494	181,494
12					
13 Total Trunkline Area N	n-Commodity			181,494	181,494

Exhibit B				
Page 6 of 8				

Expected Gas Cost (EGC) Calculation Demand Charge Calculation

Line No.		(a)	(b)	(c)	(d)	(e)
1	Total Demand Cost:					
2	Texas Gas Transmission	\$19,635,382				
3	Midwestern	0				
4	Tennessee Gas Pipeline	5,568,615				
5	Trunkline Gas Company	181,494				
6	Total	\$25,385,491				
7						
8			Allocated	Related	Monthly De	emand Charge
9	Demand Cost Allocation:	Factors	Demand	Volumes	Firm	Interruptible
10	All	0.1479	\$3,754,514	16,971,263	0.2212	0.2212
11	Firm	0.8521	21,630,977	16,537,040	1.3080	
12	Total	1.0000	\$25,385,491		1.5292	0.2212
13						
14			Volumetric	Basis for		
15		Annualized	Monthly Dema	and Charge		
16		Mcf @14.65	All	Firm		
17	Firm Service					
18	Sales:					
19	G-1	16,537,040	16,537,040	16,537,040	1.5292	
20						
21	Interruptible Service					
22	Sales:					
23	G-2	434,223	434,223		1.5292	0.2212
24						
25	Transportation Service					
26	T-3 & T-4	29,383,024				
27						
28		46,354,287	16,971,263	16,537,040		
29						
30						

Expected Gas Cost (EGC) Calculation Commodity - Total System

(d)

Line No. Description **Purchases** Rate Total Mcf MMbtu \$/Mcf \$ 1 Texas Gas Area 2 No Notice Service 1,043,330 1,089,103 4.7081 4,912,071 3 Firm Transportation 853.634 891,084 4.7045 4,015,938 4 No Notice Storage 704,949 735,876 2.7686 1,951,691 5 Total Texas Gas Area 2,601,913 2,716,063 4.1814 10,879,700 6 7 Tennessee Gas Area 8 FT-A and FT-G 201.775 213,045 4.7733 963.124 9 FT-GS 0 0 0.0000 0 10 Gas Storage 0 11 Injections 0 0 0.0000 0 12 Withdrawals 287,288 303,335 2.7112 778,903 13 489,063 516,380 3.5620 1,742,027 14 Trunkline Gas Area 15 Firm Transportation 76,961 77,500 4.4656 343,674 16 17 Company Owned Storage 18 Withdrawals 442,339 461,745 2.6522 1,173,172 **19** Injections 2.6522 0 0 20 Net WKG Storage 442,339 461.745 2.6522 1,173,172 21 22 23 Local Production 5,257 5,551 4.4170 23,220 24 25 26 27 Total Commodity Purchases 3,615,533 3,777,239 3.9169 14,161,793 28 29 Lost & Unaccounted for @ -2.21% (79,903)(83,477) 30 **31 Total Deliveries** 3.8322 14,161,793 3,695,436 3,860,716 32 33 34 35 Total Expected Commodity Cost 3.695.436 3.860.716 3.8322 14,161,793 36 37

(a)

(b)

(c)

38 Note: Column (c) is calculated by dividing column (d) by column (a)

39

Expected Gas Cost (EGC) Calculation Load Factor Calculation for Demand Allocation Exhibit B Page 8 of 8

Line			
No.	Description	MCF	
	Annualized Volumes Subject to Demand Charges		
1	Sales Volume	16,971,263	
2	Transportation	0	
3	Total Mcf Billed Demand Charges	16,971,263	
4	Divided by: Days/Year	365	
5	Average Daily Sales and Transport Volumes	46,497	
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	314,428	Mcf/Peak Day
10			
11			
12	New Load Factor (line 5 / line 9)	0.1479	
13			

### Atmos Energy Corporation Basis for Indexed Gas Cost For the Month of January - 2019

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 month of January 2019 during the period November 15 through November 28, 2018.

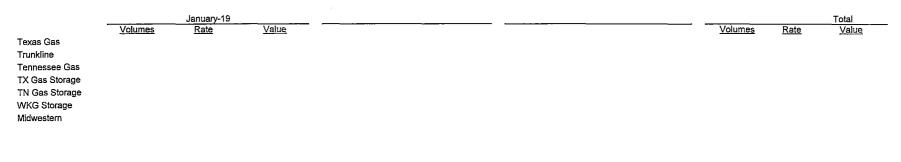
		Jan-19 (\$/MMBTU)
Thursday	11/15/18	4.043
Friday	11/16/18	4.291
Monday	11/19/18	4.712
Tuesday	11/20/18	4.521
Wednesday	11/21/18	4.477
Thursday	11/22/18	4.477
Friday	11/23/18	4.355
Monday	11/26/18	4.299
Tuesday	11/27/18	4.292
Wednesday	11/28/18	4.699
Average		\$4.417

B. The Company believes prices are increasing and prices for the month ending January 31, 2019 will settle at \$4.417 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.

EXHIBIT C Page 2 of 2

#### Atmos Energy Corporation Estimated Weighted Average Cost of Gas For the Month of January - 2019



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

WACOGs