

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF ATMOS ENERGY)	
CORPORATION FOR APPROVAL OF A SPECIAL)	CASE NO.
CONTRACT PURSUANT TO ITS ECONOMIC)	2019-00145
DEVELOPMENT RIDER)	

COMMISSION STAFF'S SECOND 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 six copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due on or before July 29, 2019. Responses to requests for information in paper medium 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 the 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, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Atmos shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Atmos's response to Commission Staff's Initial Requests for Information (Staff's Initial Request), Item 5(b), regarding the 750 Mcf per month demand threshold language in Section 3 of the special contract with Diageo Americas Supply, Inc. (Diageo).

a. Explain how the 750 Mcf per month demand threshold comports with Atmos's Economic Development Rider (EDR) tariff, which states that the EDR discount may apply to any customer with an expected demand of at least 9,000 Mcf per year.

b. Atmos's response to Staff's Initial Request, Item 5(b), states that it "intended the last sentence [of Section 3 of the special contract] to refer to 750 Mcf since the 750 Mcf per month equates to the 9,000 Mcf annual threshold." For any year during the discount period, explain how Diageo would be eligible for an EDR discount in accordance with Atmos's EDR tariff if Diageo's demand for certain month exceeds 750 Mcf, but its demand for that year is below 9,000 Mcf.

2. Refer to Atmos's response to Staff's Initial Request, Item 7, page 1 of 2. Provide the calculations illustrating the derivation of the two rates listed under the heading, "Simple Margin, special contract rates applied to annual deliveries."



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **JUL 11 2019**

cc: Parties of Record

*Honorable John N Hughes
Attorney at Law
124 West Todd Street
Frankfort, KENTUCKY 40601

*Justin M. McNeil
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Kent Chandler
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, KY 42303

*Mark R Hutchinson
Wilson, Hutchinson & Littlepage
611 Frederica Street
Owensboro, KENTUCKY 42301

*Rebecca W Goodman
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204