ATMOS energy

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MAR 29 2019

PUBLIC SERVICE COMMISSION

March 28, 2019

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

Re: Case No. 2019-00108

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.**

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

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MAR 29 2019

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:

GAS COST ADJUSTMENT	)	**CASE NO.**
FILING OF	)	**2019-00108**
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 quarterly period commencing on May 1, 2019 through July 31, 2019. 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 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.

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.

8. 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 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 28th day of March 2019.

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

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MAR 29 2019

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:

GAS COST ADJUSTMENT)
FILING OF)
ATMOS ENERGY CORPORATION)

Case No. 2019-00108

NOTICE

QUARTERLY FILING

For The Period

May 01, 2019 - July 31, 2019

Attorney for Applicant

Mark R. Hutchinson
611 Frederica Street
Owensboro, Kentucky 42301

March 28, 2019

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-Eighth Revised Sheet No. 4, Twenty-Eighth Revised Sheet No. 5, and Twenty-Eighth Revised Sheet No. 6 to its PSC No. 2, Rates, Rules and Regulations for Furnishing Natural Gas to become effective May 01, 2019.

The Gas Cost Adjustment (GCA) for firm sales service is $5.4732 per Mcf and $4.208 per Mcf for interruptible sales service. The supporting calculations for theTwenty-Eighth 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. 2018-00398, 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 May 01, 2019 through July 31, 2019 as shown in Exhibit C, page 1 of 2.

2. The G-1 Expected Gas Cost will be approximately $4.7292 per Mcf for the quarter of May 01, 2019 through July 31, 2019 as compared to $4.9057 per Mcf used

for the period of February 01, 2019 through April 30, 2019. The G-2 Expected Commodity Gas Cost will be approximately $3.464 for the quarter May 01, 2019 through July 31, 2019 as compared to $3.6405 for the period of February 01, 2019 through April 30, 2019.

3. The Company's notice sets out a new Correction Factor of $0.5202 per Mcf which will remain in effect until at least July 31, 2019.

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 January 31, 2019 (February 2019 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 Twenty-Eighth Revised Sheet No. 5; and Twenty-Eighth 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 May 01, 2019.

DATED at Dallas, Texas this 28th day of March, 2019.

ATMOS ENERGY CORPORATION

By: ______________________________

Anthony Croissant
Sr. Rate Administration Analyst
Atmos Energy Corporation

ATMOS ENERGY CORPORATION
NAME OF UTILITY

Current Rate Summary
Case No. 2019-00000

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	@	7.1982 per Mcf	@	1.7250 per Mcf	(I, -)
Next	14,700 [1]	Mcf	@	6.4332 per Mcf	@	0.9600 per Mcf	(I, -)
Over	15,000	Mcf	@	6.2432 per Mcf	@	0.7700 per Mcf	(I, -)

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	@	5.0630 per Mcf	@	0.8550 per Mcf	(I, -)
Over	15,000	Mcf	@	4.8430 per Mcf	@	0.6350 per Mcf	(I, -)

[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 March 28, 2019
MONTH / DATE / YEAR

DATE EFFECTIVE May 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 2019-00000 DATED N/A

FOR ENTIRE SERVICE AREA

P.S.C. KY NO. 2

TWENTY-EIGHTH REVISED SHEET NO. 5

CANCELLING

TWENTY-SIXTH REVISED SHEET NO. 5

ATMOS ENERGY CORPORATION
NAME OF UTILITY

Current Gas Cost Adjustments

Case No. 2019-00000

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)	4.7292	3.4640	(R, R)
CF (Correction Factor)	0.5202	0.5202	(I, I)
RF (Refund Adjustment)	0.0000	0.0000	(-, -)
PBRRF (Performance Based Rate Recovery Factor)	0.2238	0.2238	(-, -)
GCA (Gas Cost Adjustment)	$5.4732	$4.2080	(I, I)

DATE OF ISSUE March 28, 2019
MONTH / DATE / YEAR

DATE EFFECTIVE May 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 2019-00000 DATED N/A

Current Transportation
Case No. 2019-00000

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

System Lost and Unaccounted gas percentage: 1.77%

				Simple Margin		Non-Commodity		Gross Margin		
Transportation Service [1]										
Firm Service (T-4)										
First	300	Mcf	@	$1.7250	+	$0.0000	=	$1.7250	per Mcf	(-)
Next	14,700	Mcf	@	0.9600	+	0.0000	=	0.9600	per Mcf	(-)
All over	15,000	Mcf	@	0.7700	+	0.0000	=	0.7700	per Mcf	(-)
Interruptible Service (T-3)										
First	15,000	Mcf	@	$0.8550	+	$0.0000	=	$0.8550	per Mcf	(-)
All over	15,000	Mcf	@	0.6350	+	0.0000	=	0.6350	per Mcf	(-)

[1] Excludes standby sales service.

DATE OF ISSUE March 28, 2019
MONTH / DATE / YEAR

DATE EFFECTIVE May 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 2019-00000 DATED N/A

Atmos Energy Corporation
Comparison of Current and Previous Cases
Sales Service

Line No.	Description			(a) Case No. 2018-00398 $/Mcf	(b) Case No. 2019-00000 $/Mcf	(c) Difference $/Mcf
1	G - 1					
2						
3	Distribution 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	Gas Cost Adjustment Components					
9	EGC (Expected Gas Cost):					
10	Commodity			3.4218	3.2453	(0.1765)
11	Demand			1.4839	1.4839	0.0000
12	Total EGC			4.9057	4.7292	(0.1765)
13	CF (Correction Factor)			0.0306	0.5202	0.4896
14	RF (Refund Adjustment)			0.0000	0.0000	0.0000
15	PBRRF (Performance Based Rate Recovery Factor)			0.2238	0.2238	0.0000
16	GCA (Gas Cost Adjustment)			5.1601	5.4732	0.3131
17						
18	Rate per Mcf (GCA included)					
19	First	300	Mcf	6.8851	7.1982	0.3131
20	Next	14,700	Mcf	6.1201	6.4332	0.3131
21	Over	15,000	Mcf	5.9301	6.2432	0.3131
22						
23						
24	G - 2					
25						
26	Distribution Charge (per Case No. 2015-00343)					
27	First	15,000	Mcf	0.8550	0.8550	0.0000
28	Over	15,000	Mcf	0.6350	0.6350	0.0000
29						
30	Gas Cost Adjustment Components					
31	EGC (Expected Gas Cost):					
32	Commodity			3.4218	3.2453	(0.1765)
33	Demand			0.2187	0.2187	0.0000
34	Total EGC			3.6405	3.4640	(0.1765)
35	CF (Correction Factor)			0.0306	0.5202	0.4896
36	RF (Refund Adjustment)			0.0000	0.0000	0.0000
37	PBRRF (Performance Based Rate Recovery Factor)			0.2238	0.2238	0.0000
38	GCA (Gas Cost Adjustment)			3.8949	4.2080	0.3131
39						
40	Rate per Mcf (GCA included)					
41	First	300	Mcf	4.7499	5.0630	0.3131
42	Over	14,700	Mcf	4.5299	4.8430	0.3131

Atmos Energy Corporation
Comparison of Current and Previous Cases
Transportation Service

Line No.	Description			(a) Case No. 2018-00398	(b) Case No. 2019-00000	(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	1.7250	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 / Interruptible Service (Low Priority)**					
10						
11	Simple Margin / Distribution 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						

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	**Zone 1 to Zone 3**						
20	STF Contract #	35772	Section 4.2 - STF	323,400			
21	Base Rate				0.3282	106,140	106,140
22							
23							
24							
25							
26	Total Zone 1 to Zone 3			323,400		106,140	106,140
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 #	31097		1,825,000			
33	Base Rate		Section 4.1 - FT		0.3670	669,775	669,775
34							
38	Total SL to Zone 4			5,145,769		2,061,177	2,061,177
39							
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**						
47	FT Contract #	36773		1,070,000			
48	Base Rate		Section 4.1 - FT		0.1493	159,751	159,751
49							
50	Total Zone 3 to Zone 3			1,070,000		159,751	159,751
51							
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			323,400		106,140	106,140
55	Total SL to Zone 4			5,145,769		2,061,177	2,061,177
56	Total Zone 2 to Zone 4			2,309,720		642,102	642,102
57	Total Zone 3 to Zone 3			1,070,000		159,751	159,751
58							
59	Total Texas Gas			58,619,437		19,457,170	19,457,170
60							
61							
62	Total Texas Gas Area Non-Commodity					19,457,170	19,457,170

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		15.2547	2,211,932	2,211,932
4						
5	FT-A Contract # 95033		144,000			
6	Base Rate	14		15.2547	2,196,677	2,196,677
7						
8	Total Zone 0 to 2		289,000		4,408,609	4,408,609
9						
10	**1 to Zone 2**					
11	FT-A Contract # 300264		30,000			
12	Base Rate	14		10.3593	310,779	310,779
13						
14	Total Zone 1 to 2		30,000		310,779	310,779
15						
16	**Gas Storage**					
17	Production Area:					
18	Demand	61	34,968	1.9915	69,639	69,639
19	Space Charge	61	4,916,148	0.0202	99,306	99,306
20	Market Area:					
21	Demand	61	237,408	1.4630	347,328	347,328
22	Space Charge	61	10,846,308	0.0200	216,926	216,926
23	Total Storage		16,034,832		733,199	733,199
24						
25	Total Tennessee Gas Area FT-G Non-Commodity				5,452,587	5,452,587

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				2,281,474		
2	Indexed Gas Cost					2.9690	6,773,695
3	Commodity (Zone 3)	Section 4.4 - NNS				0.0490	111,792
4	Fuel and Loss Retention @	Section 4.18.1	1.76%			0.0532	121,374
5						3.0712	7,006,861
6							
7	Firm Transportation				1,866,660		
8	Indexed Gas Cost					2.9690	5,542,114
9	Base (Weighted on MDQs)					0.0442	82,506
10	ACA	Section 4.1 - FT				0.0013	2,427
11	Fuel and Loss Retention @	Section 4.18.1	1.76%			0.0532	99,306
12						3.0677	5,726,353
13	No Notice Storage						
14	Net (Injections)/Withdrawals						
15	Withdrawals				0	2.6390	0
16	Injections				(1,486,168)	2.9690	(4,412,433)
17	Commodity (Zone 3)	Section 4.4 - NNS				0.0490	(72,822)
18	Fuel and Loss Retention @	Section 4.18.1	1.76%			0.0532	(79,064)
19					(1,486,168)	3.0712	(4,564,319)
20							
21							
22	Total Purchases in Texas Area				2,661,966	3.0687	8,168,895
23							
24							

25 Used to allocate transportation non-commodity

Line No.	Description	Tariff Sheet No.	Annualized MDQs in MMbtu	Allocation	Commodity Charge $/MMbtu	Weighted Average
26						
29	Texas Gas					
30	SL to Zone 2	Section 4.1 - FT	12,340,360	21.44%	$0.0399	$ 0.0086
31	SL to Zone 3	Section 4.1 - FT	37,430,188	65.04%	0.0445	$ 0.0289
32	1 to Zone 3	Section 4.1 - FT	323,400	0.56%	0.0422	$ 0.0002
33	SL to Zone 4	Section 4.1 - FT	5,145,769	8.94%	0.0528	$ 0.0047
34	2 to Zone 4	Section 4.1 - FT	2,309,720	4.01%	0.0446	$ 0.0018
35	Total		57,549,437	100.0%		$ 0.0442
36						
37	Tennessee Gas					
38	0 to Zone 2	24	289,000	90.60%	$0.0167	$ 0.0151
39	1 to Zone 2	24	30,000	9.40%	0.0087	0.0008
40	Total		319,000	100.00%		$ 0.0159

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				705,821		
2	Indexed Gas Cost					2.9690	2,095,583
3	Base Commodity (Weighted on MDQs)					0.0159	11,256
4	ACA	24				0.0013	918
5	Fuel and Loss Retention	32	1.92%			0.0581	41,008
6						3.0443	2,148,765
7							
8	FT-GS				0		
9	Indexed Gas Cost					2.9690	0
10	Base Rate	26				0.8518	0
11	ACA	24				0.0013	0
12	Fuel and Loss Retention	32	1.92%			0.0581	0
13						3.8802	0
14							
15	Gas Storage						
16	FT-A & FT-G Market Area Withdrawals				0	2.6390	-
17	FT-A & FT-G Market Area Injections				(509,956)	2.9690	(1,514,059)
18	Withdrawal Rate	61				0.0087	0
19	Injection Rate	61				0.0087	(4,437)
20	Fuel and Loss Retention	61	1.51%			0.0001	(51)
21	Total				(509,956)	2.9778	(1,518,547)
22							
23							
24							
25	Total Tennessee Gas Zones				195,865	3.2176	630,218

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				92,000		
3	Indexed Gas Cost					2.9690	273,148
4	Base Commodity	13				0.0051	469
5	ACA	13				0.0013	120
6	Fuel and Loss Retention	13	0.39%			0.0086	791
7						2.9840	274,528
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

Line No.		(a)	(b)	(c)	(d)	(e)
1	Total Demand Cost:					
2	Texas Gas Transmission	$19,457,170				
3	Midwestern	0				
4	Tennessee Gas Pipeline	5,452,587				
5	Trunkline Gas Company	181,494				
6	Total	$25,091,251				
7						
8			Allocated	Related	Monthly Demand Charge	
9	Demand Cost Allocation:	Factors	Demand	Volumes	Firm	Interruptible
10	All	0.1490	$3,738,596	17,095,049	0.2187	0.2187
11	Firm	0.8510	21,352,655	16,877,502	1.2652	
12	Total	1.0000	$25,091,251		1.4839	0.2187
13						
14			Volumetric Basis for			
15		Annualized	Monthly Demand Charge			
16		Mcf @14.65	All	Firm		
17	Firm Service					
18	Sales:					
19	G-1	16,877,502	16,877,502	16,877,502	1.4839	
20						
21	Interruptible Service					
22	Sales:					
23	G-2	217,547	217,547		1.4839	0.2187
24						
25	Transportation Service					
26	T-3 & T-4	30,275,212				
27						
28		47,370,260	17,095,049	16,877,502		
29						
30						

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

Line No.	Description		(a) Purchases	(b)	(c) Rate	(d) Total
			Mcf	MMbtu	$/Mcf	$
1	**Texas Gas Area**					
2	No Notice Service		2,236,344	2,281,474	3.1332	7,006,861
3	Firm Transportation		1,829,736	1,866,660	3.1296	5,726,353
4	No Notice Storage		(1,456,770)	(1,486,168)	3.1332	(4,564,319)
5	Total Texas Gas Area		2,609,310	2,661,966	3.1307	8,168,895
6						
7	**Tennessee Gas Area**					
8	FT-A and FT-G		665,604	705,821	3.2283	2,148,765
9	FT-GS		0	0	0.0000	0
10	Gas Storage					
11	Injections		(480,899)	(509,956)	3.1576	(1,518,496)
12	Withdrawals		0	0	0.0000	(51)
13			184,705	195,865	3.4120	630,218
14	**Trunkline Gas Area**					
15	Firm Transportation		91,542	92,000	2.9989	274,528
16						
17	**Company Owned Storage**					
18	Withdrawals		(1,082,703)	(1,104,552)	3.0712	(3,325,197)
19	Injections		0		0.0000	0
20	Net WKG Storage		(1,082,703)	(1,104,552)	3.0712	(3,325,197)
21						
22						
23	Local Production		5,109	5,418	2.9691	15,169
24						
25						
26						
27	Total Commodity Purchases		1,807,963	1,850,697	3.1879	5,763,613
28						
29	Lost & Unaccounted for @	1.77%	32,001	32,757		
30						
31	Total Deliveries		1,775,962	1,817,940	3.2453	5,763,613
32						
33						
34						
35	Total Expected Commodity Cost		1,775,962	1,817,940	3.2453	5,763,613
36						
37						
38	Note: Column (c) is calculated by dividing column (d) by column (a)					
39						

Line No.	Description	MCF	
	Annualized Volumes Subject to Demand Charges		
1	Sales Volume	17,095,049	
2	Transportation	0	
3	Total Mcf Billed Demand Charges	17,095,049	
4	Divided by: Days/Year	365	
5	Average Daily Sales and Transport Volumes	46,836	
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)	**0.1490**	
13			

Atmos Energy Corporation

Basis for Indexed Gas Cost

For the Quarter ending July - 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 quarter of May 2019 through July 2019 during the period March 12 through March 25, 2019.

		May-19 ($/MMBTU)	Jun-19 ($/MMBTU)	Jul-19 ($/MMBTU)
Tuesday	03/12/19	2.797	2.848	2.902
Wednesday	03/13/19	2.834	2.883	2.935
Thursday	03/14/19	2.860	2.905	2.952
Friday	03/15/19	2.802	2.852	2.904
Monday	03/18/19	2.856	2.905	2.957
Tuesday	03/19/19	2.872	2.915	2.963
Wednesday	03/20/19	2.825	2.872	2.922
Thursday	03/21/19	2.827	2.877	2.932
Friday	03/22/19	2.767	2.821	2.880
Monday	03/25/19	2.774	2.825	2.883
Average		$2.821	$2.870	$2.923

B. The Company believes prices are increasing and prices for the quarter ending July 31, 2019 will settle at $2.969 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 July - 2019

	May-19			June-19			July-19			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 January 2019
2019-00000

34,115,429.01

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	November-18	2,608,576	$10,877,949.30	$6,436,015.97	$4,441,933.33	$0.00	$4,441,933.33
2							
3	December-18	2,981,368	$13,916,623.38	$11,254,760.13	$2,661,863.25	$0.00	$2,661,863.25
4							
5	January-19	3,813,407	$13,958,878.23	$14,558,559.85	($599,681.62)	$0.00	($599,681.62)
6							
7	Total Gas Cost						
8	Under/(Over) Recovery		$38,753,450.91	$32,249,335.95	$6,504,114.96	$0.00	$6,504,114.96
9							
10	PBR Savings reflected in Gas Costs		$964,014.31				
11							
12	Correction Factor - Part 1						
13	(Over)/Under Recovered Gas Cost through October 2018 (November 2018 GL)					(140,921.10)	
14	Total Gas Cost Under/(Over) Recovery for the three months ended January 2019					6,504,114.96	
15	Recovery from outstanding Correction Factor (CF)					1,866,093.06	
16	Over-Refunded Amount of Pipeline Refunds					0.00	
17	Prior Net Uncollectable Gas Cost as of November, 2017						
18	(Over)/Under Recovered Gas Cost through January 2019 (February 2019 GL) (a)					$8,229,286.92	
19	Divided By: Total Expected Customer Sales (b)					17,095,049 Mcf	
20							
21	Correction Factor - Part 1					**$0.4814** / Mcf	
22							
23	Correction Factor - Part 2						
24	Net Uncollectible Gas Cost through November 2018 (c)					662,947.63	
25	Divided By: Total Expected Customer Sales (b)					17,095,049	
26							
27	Correction Factor - Part 2					**$0.0388** / Mcf	
28							
29	Correction Factor - Total (CF)						
30	Total Deferred Balance through January 2019 (February 2019 GL) incl. Net Uncol Gas Cost					$8,892,234.55	
31	Divided By: Total Expected Customer Sales (b)					17,095,049	
32							
33	**Correction Factor - Total (CF)**					**$0.5202** / Mcf	
34							

Atmos Energy Corporation
Recoverable Gas Cost Calculation
For the Three Months Ended January 2019
2019-00000

Line No.	Description	Unit	(a) December-18	(b) January-19	(c) February-19
		GL	December-18	January-19	February-19
			Month		
			November-18	December-18	January-19
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	1,579,889	1,678,978	1,912,993
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	657,670	759,142	1,203,023
14	Injections	Mcf	(6,448)	(14,677)	(3,364)
15	Producers	Mcf	2,212	2,116	1,090
16	Third Party Reimbursements	Mcf	(512)	(114)	(144)
17	Pipeline Imbalances cashed out	Mcf			
18	System Imbalances [2]	Mcf	375,765	555,923	699,809
19	**Total Supply**	Mcf	2,608,576	2,981,368	3,813,407
20					
21	Change in Unbilled	Mcf			
22	Company Use	Mcf	0	0	0
23	Unaccounted For	Mcf	0	0	0
24	**Total Purchases**	Mcf	2,608,576	2,981,368	3,813,407

[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 January 2019
2019-00000

Line No.	Description	GL Unit	December-18 (a) November-18	January-19 (b) Month December-18	February-19 (c) January-19
1	**Supply Cost**				
2	Pipelines:				
3	Texas Gas Transmission [1]	$	1,731,491	1,789,207	1,789,765
4	Tennessee Gas Pipeline [1]	$	524,500	533,528	563,626
5	Trunkline Gas Company [1]	$	31,945	32,991	32,990
6	Twin Eagle Resource Management	$	0	0	0
7	Midwestern Pipeline [1]	$	0	0	0
8	**Total Pipeline Supply**	$	2,287,935	2,355,726	2,386,380
9	Total Other Suppliers	$	5,885,107	7,764,110	6,537,808
10	Hedging Settlements	$	0	0	0
11	Off System Storage				
12	Texas Gas Transmission	$			
13	Tennessee Gas Pipeline	$			
14	WKG Storage	$	161,659	147,954	147,954
15	System Storage				
16	Withdrawals	$	1,810,883	2,085,621	3,330,114
17	Injections	$	(26,047)	(72,559)	(12,317)
18	Producers	$	7,926	9,133	3,627
19	Third Party Reimbursements	$	(2,470)	(516)	(698)
20	Pipeline Imbalances cashed out	$			
21	System Imbalances [2]	$	752,955	1,627,156	1,566,008
22	**Sub-Total**	$	10,877,949	13,916,623	13,958,878
23	Pipeline Refund + Interest				
24	Change in Unbilled	$			
25	Company Use	$			
26	Recovered thru Transportation	$			
27	**Total Recoverable Gas Cost**	$	10,877,949.30	13,916,623.38	13,958,878.23

[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 January 2019
2019-00000

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	November-18	G-1 Sales	1,426,094.799	($0.2849)	($406,294.41)	$0.0000	$0.00	$0.1852	$264,112.76	$4.4228	$6,307,332.08	$6,165,150.43	
2		G-2 Sales	11,417.567	($0.2849)	(3,252.86)	$0.0000	0.00	$0.1852	2,114.53	$3.1148	35,563.44	$34,425.11	
6		Sub Total	1,437,512.366		($409,547.27)		$0.00		$266,227.29		$6,342,895.52	$6,199,575.54	
7		Timing: Cycle Billing and PPA's	0.000		(2,870.07)		0.00		5,364.66		93,120.45	$95,615.04	
8		Total	1,437,512.366		($412,417.34)		$0.00		$271,591.95		$6,436,015.97	$6,295,190.58	$6,023,598.63
9													
10													
11	December-18	G-1 Sales	2,437,279.422	($0.2849)	($694,380.91)	$0.0000	$0.00	$0.1852	$451,384.15	$4.4228	$10,779,599.43	$10,536,602.67	
12		G-2 Sales	10,052.200	($0.2849)	(2,863.87)	$0.0000	0.00	$0.1852	1,861.67	$3.1148	31,310.59	$30,308.39	
16		Sub Total	2,447,331.622		($697,244.78)		$0.00		$453,245.82		$10,810,910.02	$10,566,911.06	
17		Timing: Cycle Billing and PPA's	0.000		(208.92)		0.00		28,965.51		443,850.11	$472,606.70	
18		Total	2,447,331.622		($697,453.70)		$0.00		$482,211.33		$11,254,760.13	$11,039,517.76	$10,557,306.43
19													
20													
21	January-19	G-1 Sales	2,645,829.887	($0.2849)	($753,796.93)	$0.0000	$0.00	$0.1852	$490,007.70	$5.3614	$14,185,352.36	$13,921,563.13	
22		G-2 Sales	8,306.727	($0.2849)	(2,366.59)	$0.0000	0.00	$0.1852	1,538.41	$4.0534	33,670.49	$32,842.31	
26		Sub Total	2,654,136.614		($756,163.52)		$0.00		$491,546.11		$14,219,022.85	$13,954,405.44	
27		Timing: Cycle Billing and PPA's	0.000		(58.50)		0.00		24,285.73		339,537.00	$363,764.23	
28		Total	2,654,136.614		($756,222.02)		$0.00		$515,831.84		$14,558,559.85	$14,318,169.67	$13,802,337.83
29													
30													
31	Total Recovery from Correction Factor (CF)				($1,866,093.06)								
32	Total Amount Refunded through the Refund Factor (RF)						$0.00						
33	Total Recovery from Performance Based Rate Recovery Factor (PBRRF)								$1,269,635.12				
34	Total Recoveries from Expected Gas Cost (EGC) Factor										$32,249,335.95		
35	Total Recoveries from Gas Cost Adjustment Factor (GCA)											$31,652,878.01	
36													
37													$30,383,242.89

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	November, 2018 MCF	November, 2018 Cost	December, 2018 MCF	December, 2018 Cost	January, 2019 MCF	January, 2019 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	1,429,931	$5,276,040.83	1,510,887	$6,928,616.41	1,756,421	$5,960,205.17
Tennessee Gas Pipeline Area						
Chevron Natural Gas, Inc.						
Atmos Energy Marketing, LLC						
WESCO						
Prepaid						
Reservation						
Fuel Adjustment						
Total	151,275	$613,065.10	167,566	$833,243.00	156,683	$578,024.54
Trunkline Gas Company						
Atmos Energy Marketing, LLC						
Engage						
Prepaid						
Reservation						
Fuel Adjustment						
Total	(1,562)	($4,850.52)	(218)	($666.19)	(181)	($504.39)
Midwestern Pipeline						
Atmos Energy Marketing, LLC						
Midwestern Gas Transmission						
Anadarko						
Prepaid						
Reservation						
Fuel Adjustment						
Total	245	$1,005.85	743	$3,107.45	70	$222.20
ANR Pipeline						
Atmos Energy Marketing, LLC						
LG&E Natural						
Anadarko						
Prepaid						
Reservation						
Fuel Adjustment						
Total	0	($154.12)	0	($191.14)	0	($139.32)
All Zones						
Total	1,579,889	$5,885,107.14	1,678,978	$7,764,109.53	1,912,993	$6,537,808.20

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

Atmos Energy Corporation
Net Uncollectible Gas Cost
Twelve Months Ended November, 2018

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-17	($64,503.06)	($134,412.80)	($6,727.81)	($205,643.67)	$20,208.37	$49,988.32	$44,294.69	$44,294.69
2	Jan-18	($12,606.47)	($45,893.68)	($2,458.34)	($60,958.49)	$13,253.62	$16,484.00	($647.15)	$43,647.54
3	Feb-18	($27,020.56)	($115,508.78)	($3,891.32)	($146,420.66)	$8,790.27	$29,117.89	$18,230.29	$61,877.83
4	Mar-18	($3,624.19)	($43,715.38)	($1,368.78)	($48,708.35)	$10,692.19	$14,425.86	($7,068.00)	$54,809.83
5	Apr-18	($22,726.45)	($75,593.33)	($3,818.44)	($102,138.22)	$4,537.99	$7,763.14	$18,188.46	$72,998.29
6	May-18	($28,298.73)	($60,014.35)	($3,105.88)	($91,418.96)	$4,666.97	$8,429.82	$23,631.76	$96,630.05
7	Jun-18	($36,465.23)	($46,406.98)	($2,836.59)	($85,708.80)	$3,761.26	$6,223.11	$32,703.97	$129,334.02
8	Jul-18	($74,077.63)	($74,207.98)	($6,453.29)	($154,738.90)	$4,892.55	$8,284.68	$69,185.08	$198,519.10
9	Aug-18	($105,026.16)	($115,968.02)	($8,340.59)	($229,334.77)	$5,348.42	$5,888.03	$99,677.74	$298,196.84
10	Sep-18	($131,229.06)	($143,720.03)	($9,996.26)	($284,945.35)	$7,127.83	$9,672.83	$124,101.23	$422,298.07
11	Oct-18	($198,847.02)	($216,930.61)	($14,086.79)	($429,864.42)	$29,094.55	$28,001.60	$169,752.47	$592,050.54
12	Nov-18	($117,596.02)	($156,629.03)	($9,551.56)	($283,776.61)	$46,698.93	$40,917.07	$70,897.09	$662,947.63