

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC REQUEST OF ATMOS ENERGY)	
CORPORATION FOR MODIFICATION AND)	CASE NO.
EXTENSION OF ITS GAS COST ADJUSTMENT)	2020-00289
PERFORMANCE BASED RATEMAKING)	
MECHANISM)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO ATMOS ENERGY CORPORATION

Atmos Energy Corporation (Atmos), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than February 16, 2022. The Commission directs Atmos to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 Atmos obtains information that indicates 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, Atmos 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. Identify any economic or scientific studies of which Atmos is aware that support the contention that adopting a Performance Based Rate (PBR) mechanism reduces gas costs for customers of local gas distribution companies, and provide copies of any such studies.

2. Provide the most recent version of the S&P Global/Platts *Methodology and Specifications Guide* for the United States and Canada's natural gas market, explaining how Platts determines its Inside FERC and Gas Daily prices and identifying the locations at which it offers prices.

3. Refer to Atmos's response to Staff's Third Request for Information, Item 2, Attachment 1 and Attachment 2.

a. Provide a map of the Texas Gas Transmission pipeline showing the zones and the major receipt and delivery points.

b. Provide a map of the Trunkline pipeline, identified in Attachment 1, showing the zones and the major receipt and delivery points and, if not indicated in Attachment 1, identify the zone(s) in which Atmos Kentucky's receipt points are located.

c. Provide a map of the ANR pipeline, identified in Attachment 1, showing the zones and the major receipt and delivery points and, if not indicated in Attachment 1, identify the zone(s) in which Atmos's receipt points are located.

d. Provide a map of the Tennessee Gas Pipeline showing the zones and the major receipt and delivery points and, if not indicated in Attachment 2, identify the zone(s) in which Atmos's receipt points are located.

4. Refer to Atmos's response to Staff's First Request for Information, Item 1, Confidential Attachment 1.

a. Provide an Excel spreadsheet, with formulas, columns, and rows unprotected and fully accessible, showing how the actual transportation costs for each pipeline, used to calculate total transportation cost for each month shown in Attachment 1, were calculated for each month from June 2017 through May 2020.

b. Provide an Excel spreadsheet, with formulas, columns, and rows unprotected and fully accessible, showing how the benchmark transportation costs, used to calculate the savings shown on Attachment 1, were calculated from the benchmarks for each pipeline for each month from June 2017 through May 2020.

5. Provide the design day demand Atmos used to determine the transportation and outside storage requirements for its Kentucky distribution system (or systems, if planning is conducted separately) for each of the last five years, explain how Atmos calculates its design day demand, and explain how Atmos's design day demand in a given year relates to its projected peak demand.

6. Identify and describe the extent to which, if any, Atmos has contracted for firm transportation and storage entitlements in excess of those necessary to meet Atmos's projected design day demand or its projected peak demand in the last five years, and explain why Atmos contracts for firm transportation and storage entitlements in excess of that necessary to meet Atmos's projected design day demand or its projected peak demand.

7. For each month from June 2016 through May 2021, provide the (1) Inside FERC first of the month posting for ANR-Louisiana, (2) the Inside FERC first of the month posting for Texas Gas Zone 1, (3) the Inside FERC first of the month posting for Tennessee Louisiana 500 Leg, (4) the Inside FERC first of the month posting for South Louisiana-Henry Hub, (5) the Inside FERC first of the month posting for Trunkline Louisiana, (6) the New York Mercantile Exchange Settled Closing Price, and (7) the Inside FERC first of the month posting for Texas Gas Zone SL.

8. Describe the annual activity involved in the pipeline segmentation arrangement with Atmos Mississippi.

9. If the asset managers are not releasing capacity, explain the arrangements through which the asset managers use Atmos's pipeline capacity to generate cost savings.



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DATED FEB 02 2022

cc: Parties of Record

Case No. 2020-00289

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