COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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OFFICE OF THE ATTORNEY GENERAL	OCT 3 0 2006
COMMONWEALTH OF KENTUCKY Complainant	PUBLIC SERVICE COMMISSION
v.	· :
ATMOS ENERGY CORPORATION	: Case No. 2005-00057 :
Respondent	:
	:

ATTORNEY GENERAL'S RESPONSES TO DISCOVERY REQUESTS OF PUBLIC SERVICE COMMISSION

Comes now the Attorney General, by and through his Office of Rate

Intervention, and states as follows for his responses to the discovery requests of

the Public Service Commission.

Respectfully submitted,

GREGORY D. STUMBO ATTORNEY GENERAL

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DENNIS G. HOWARD II ELIZABETH B. BLACKFORD DAVID EDWARD SPENARD LAWRENCE W. COOK ASSISTANT ATTORNEYS GENERAL 1024 CAPITAL CENTER DRIVE, SUITE 200 FRANKFORT KY 40601-8204 T (502) 696-5453 F (502) 573-8315

Notice of Serving and Filing in Paper and Electronic Medium

Per Instruction 2 (d) of the Commission's 3 March 2006 Order, Counsel submits for filing, by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Blvd., Frankfort, KY 40601, the original and five copies of the document in paper medium. Counsel also submits a copy of the document in electronic medium by e-mailing the document to <u>pscfilings@ky.gov</u> and Beth.O'Donnell@ky.gov. 30 October 2006 is the date for the filing and service in paper and electronic medium.

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Assistant Attorney General

Certificate of Service

Per Instructions 2 (d) and 8 the 3 March 2006 Order, Counsel certifies service of a true and correct photocopy of the document by mailing the photocopy, first class postage prepaid, to the following:

John N. Hughes 124 West Todd St. Frankfort, KY 40601

Counsel further certifies, per Instructions 2 (e) and 9, service of an electronic version of the document by electronic mail to the following: <u>jnhughes@fewpb.net</u>; <u>randy@whplawfirm.com</u>; <u>gary.smith@atmosenergy.com</u>; and <u>douglas.walther@atmosenergy.com</u>. Service was made this 30th day of October 2006.

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Assistant Attorney General

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Witness Responsible: ROBERT J. HENKES

Question 1: Refer to the Supplemental Testimony of Robert J. Henkes ("Henkes Supplemental Testimony"), pages 3 through 5. Commission Staff notes in Mr. Henkes' testimony that he has not proposed any pro forma adjustments, with the exception of certain tax adjustments, due to his inability to propose all possible pro forma adjustments.

- a. Does Mr. Henkes agree that an adjustment to normalize payroll expenses is a normal rate-making adjustment and that sufficient information was provided in Atmos's responses to the AG's First Data Request dated March 15, 2006 ("AG First Request"), Items 19, 20, 39, 40, and 61, and the responses to the AG's Second Data Request dated June 14, 2006 ("AG's Second Request"), Item 7, to make such an adjustment in this proceeding? If Mr. Henkes does not agree, state why he does not agree.
- b. Does Mr. Henkes agree that a year-end customer adjustment is a normal rate-making adjustment and that the information provided in the responses to the AG's First Request, Items 21 and 68, and the response to the AG's Second Request, Item 7(c), is sufficient to make such an adjustment? If Mr. Henkes does not agree, state why he does not agree.
- c. Does Mr. Henkes agree that an adjustment to normalize Atmos's payroll tax and employee benefits expenses is a normal rate-making adjustment and that the information provided in the responses to AG's First Request, Items 20, 39, 40, and 45, and the response to the AG's Second Date Request, Item 7 is sufficient to make such an adjustment? If Mr. Henkes does not agree, state why he does not agree.
- d. Does Mr. Henkes agree that an adjustment to normalize depreciation expense is a normal rate-making adjustment and that sufficient information was provided in the responses to AG's First Request, Items 3, page 338, and 25 to make such an adjustment in this proceeding? If Mr. Henkes does not agree, state why he does not agree.

e. Given the information provided in the responses to the AG's First Request, Items 38, 52, and 55, and the responses to AG's Second Request, Items 15 and 17, does Mr. Henkes agree that adjustments should be made to remove advertising and donation expenses from accounts other than Account No. 426? If Mr. Henkes does not agree, state why he does not agree.

Response:

a. Mr. Henkes agrees that an adjustment to normalize payroll expenses is a normal rate-making adjustment, but does not agree that sufficient information was provided in Atmos's responses to the AG's First Data Request dated March 15, 2006 ("AG First Request"), Items 19, 20, 39, 40, and 61, and the responses to the AG's Second Data Request dated June 14, 2006 ("AG's Second Request"), Item 7, to make such an adjustment in this proceeding.

In order to determine an appropriately calculated payroll expense normalization and annualization adjustment in this case, one needs to compare the pro forma adjusted test year payroll costs charged to O&M expense with the actual per books test year payroll costs charged to O&M expense. While this information was requested by the AG in Data Requests AG-1-39 and 1-40, the Company only provided the actual per books test year payroll costs charged to O&M expense and did not provide the appropriate pro forma adjusted test year payroll costs charged to O&M expense. To calculate the appropriate and accurate pro forma adjusted test year payroll costs charged to O&M expense, one needs to know both the exact timing and dollar magnitude of any wage/salary increases granted to each employee during the test year and/or within a reasonable period after the end of the test year. This information is not available from any of the data responses referenced in the question above. In addition, in Mr. Henkes' opinion, one would need to have 3 to 5 years of historic overtime and O&M expense ratio information available in order to determine the appropriate normalized pro forma test year overtime expenses and O&M expense ratio. This information is also not available from any of the data responses referenced in the question above. Mr. Henkes also notes that both the total payroll costs and O&M payroll expenses for fiscal years 2004 and 2005 shown in the response to Data

Request AG-1-61 do not reconcile to the corresponding total payroll costs and O&M payroll expenses for fiscal years 2004 and 2005 shown in the response to Data Request AG-1-40.

b. Mr. Henkes agrees that a test year-end customer growth adjustment is appropriate in order to match the use of a test year-end rate base and capitalization, but does not agree that sufficient information was provided in Atmos's responses to the AG's First Data Request, Items 21 and 68 and the response to the AG's Second Data Request, Item 7(c), to make such an adjustment in this proceeding.

The only information provided in the responses to the AG's First Data Request, Item 21 and the AG's Second Data Request, Item 7 (c) is the actual monthly number of customers by customer class. While this information could be used to determine the average test year and test year-end customer levels by customer class, additional information is required to calculate an appropriate year-end customer growth revenue annualization adjustment. This additional information would include, for each customer class, the annual test year customer charges, the test year MCF sales volumes, the average test year MCF sales per customer, and the test year base rate per MCF consumption. This information is not available from any of the data responses referenced in the question above.

c. Mr. Henkes agrees that adjustments to normalize Atmos's payroll tax and employee benefits expenses are normal rate-making adjustments, but does not agree that sufficient information was provided in Atmos's responses to the AG's First Data Request, Items 20, 39, 40, and 45, and the response to the AG's Second Data Request, Item 7, to make such adjustments in this proceeding.

In order to determine appropriately calculated payroll tax and employee benefits expense normalization and annualization adjustments in this case, one needs to compare the pro forma adjusted test year payroll taxes and employee benefits costs charged to O&M expense with the actual per books test year payroll taxes and employee benefits costs charged to O&M expense. While this information was requested by the AG in Data Requests AG-1-39, 1-40, and AG-1-72, the Company only provided the actual per books test year payroll taxes and employee benefits costs charged to O&M expense and did not provide the appropriate pro forma

adjusted test year payroll taxes and employee benefits costs charged to O&M expense. To calculate the appropriate and accurate pro forma adjusted test year payroll taxes and employee benefit costs charged to O&M expense, one needs to know the pro forma adjusted test year payroll expenses and the exact timing and dollar magnitude of any changes in the various employee benefits costs during the test year and/or within a reasonable period after the end of the test year. This information is not available from any of the data responses referenced in the question above. In addition, in Mr. Henkes' opinion, one would need to have 3 to 5 years of historic O&M expense ratio information available in order to determine the appropriate normalized pro forma test year O&M expense ratio used to determine the pro forma test year payroll taxes and employee benefits costs charged to O&M expense. This information is also not available from any of the data responses referenced in the question above. Mr. Henkes also notes that the response to Data Request AG-1-20 only provides some general information regarding salary and wage increases and no information regarding payroll taxes and employee benefits expenses. In addition, Mr. Henkes notes that the response to Data Request AG-1-45 contains OPEB funding information and no information regarding payroll taxes and employee benefit expenses.

d. Mr. Henkes agrees that an adjustment to normalize depreciation expense is a normal rate-making adjustment, but does not agree that sufficient information was provided in the responses to the AG's First Request, Items 3, page 338, and 25 to make such an adjustment in this proceeding.

The 5 depreciation rate numbers shown on page 338 of the AG's First Request, Item 3, represent composite depreciation rates applicable to the total Production, Gas Storage, Distribution, Transmission and General plant categories of the total consolidated Atmos Energy Corporation. It would not be accurate and appropriate to apply these 5 composite depreciation rates to the total 9/30/05 Production, Gas Storage, Distribution, Transmission and General plant categories of Atmos Energy-Kentucky shown in the response to AG-1-25 to arrive at the Atmos Energy-Kentucky's pro forma test year normalized depreciation expenses.

In fact, Mr. Henkes has calculated that if these 5 depreciation rate numbers were applied to the total 9/30/05 Production, Gas Storage, Distribution, Transmission and General plant categories of Atmos Energy-Kentucky shown in the response to AG-1-25,¹ this would result in normalized deprecation expenses of \$10,209,494, which is approximately \$1.5 million *lower* than Atmos Energy-Kentucky's actual test year depreciation expenses of \$11,739,044. Mr. Henkes believes that this outcome is wrong and concludes that, therefore, it is not possible to accurately calculate Atmos Energy's normalized test year depreciation expenses based on the information in the response to AG-1-25 and the response to AG-1-3, page 338.

The Attorney General makes note herein that it does not believe it ever received a hard copy of Atmos' responses to the AG's Initial Data Requests, and instead only received the responses via e-mail. When the Attorney General's Office compared what it had received with what was on file with the Public Service Commission, it became apparent that the materials e-mailed did not contain FERC Form 2 page 338, although those materials were provided to the Commission.

e. Yes. However, for the reasons explained on pages 5 and 6 of Mr. Henkes' Supplemental testimony, Mr. Henkes has not reflected these pro forma expense adjustments in his earnings analysis.

¹ The total of these 9/30/05 plant categories amounts to \$277,912,514 for the "direct" plant investment and 5.21% of the 9/30/05 Shared Services plant of \$177,794,167 allocated to Atmos Energy-Kentucky.

Witness Responsible: ROBERT J. HENKES

Question 2: Refer to the Henkes Supplemental Testimony, page 5. Mr. Henkes states that he had identified a number of pro forma adjustments for which he had available data, but because there were potentially a significant number of other pro forma adjustments he could not identify, he based his earnings review on the unadjusted test year rate base, capitalization, capital structure, and operating income data. Provide a listing of the pro forma adjustments Mr. Henkes identified for which he had available data.

- Response: Normalization of uncollectible expenses (AG-1-49 and AG-2-5e)
 - Removal of incentive compensation expenses (AG-1-63 and AG-2-10)
 - Normalization of I&D expenses (AG-1-66)
 - Removal of fines and penalty expenses (AG-1-71 and AG-2-11)

- Removal of lobbying (public affairs) expenses in AGA dues (AG-1-56, AG-1-75, and AG-2-13)

- Removal of public/community relations expenses (AG-1-64 and AG-2-14)

- Removal of donations expenses (AG-1-55 and AG-2-15)

- Removal of promotional and institutional advertising expenses (AG-1-52 and AG-1-38-6)

- Removal of party, outing and gift expenses (AG-2-17)
- Removal of service awards expenses (AG-1-38-4 and AG-2-16c)
- Removal of social and service club dues (AG-2-16b)
- Removal of country club dues (AG-1-38-3)

Witness Responsible: ROBERT J. HENKES

Question 3: Concerning the development of pro forma adjustments:

- a. Would Mr. Henkes agree that the majority of pro forma adjustments usually proposed in a historic test year before the Commission are based on events or transactions occurring during the test year and adjusted for known and measurable changes, which occurred either during the test year or within a few months of the end of the test year?
- b. Given the way the majority of proposed pro forma adjustments are prepared and the fact that the AG had three opportunities to secure information from Atmos, explain in detail why Mr. Henkes did not have the data necessary to develop and propose pro forma adjustments in his supplemental testimony.

- a. Yes.
- b. In Data Requests AG-1-24, AG-1-30 and AG-1-31, the AG requested Atmos to provide all pro forma test year rate base and operating income adjustments to be reflected in this case in order to arrive at the appropriate pro forma annualized and normalized test year results. In accordance with the Commission's May 9, 2006 Order in this case, Atmos did not provide this information. As a result, the AG did not even have available a listing and description of all of the pro forma adjustments that would need to be considered in order to normalize any abnormalities incorporated in the unadjusted per books test year results and to annualize the impacts of any expense/tax/revenue changes that occurred during and/or shortly after the test year. As described in more detail in Mr. Henkes' Supplemental testimony starting on page 4, line 18 and ending on page 6, line 2, for these reasons the AG did not propose pro forma adjustments in this case.

Witness Responsible: ROBERT J. HENKES

Question 4: Refer to the Henkes Supplemental Testimony, Schedule RJH-4.

- a. Would Mr. Henkes agree that in previous rate cases, the Commission recognized changes in interest rates for long-term and short-term debt that occurred after the end of the test year?
- b. Explain why Mr. Henkes chose not to recognize the updated interest rates for long-term and short-term debt, which were provided in the response to the AG's Second Request, Item 7, in his determination of Atmos's earnings.

- a. Yes.
- b. The reasons for this are discussed in the Henkes Supplemental Testimony, from page 5, line 19 to page 6, line 2.

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WITNESS RESPONSIBLE: DR. J. RANDALL WOOLRIDGE

Question 5: Refer to page 3 of the Direct Testimony of Dr. J. Randall Woolridge. Explain why a 10-year Treasury bond yield is the appropriate comparison to develop a risk premium, as opposed to a 20- or 30- year Treasury yield

Response:

See Dr. Woolridge's testimony at page 29.

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WITNESS RESPONSIBLE: DR. J. RANDALL WOOLRIDGE

Question 6: Refer to pages 3 and 4 of Woolridge testimony.

- a. Both Jeremy Siegel and Alan Greenspan made the comments quoted in the testimony in 1999, which was before the market adjustment in 2000. Are there any studies after 1999 which researched the equity premium after the substantial drop in stock prices since 2000.
- b. Were Mr. Siegel and Mr. Greenspan talking about the near future or the long term?

- a. Greenspan's comments were not supported by any published studies. Siegel has performed studies covering over 100 years of stock return data. Hence, his comments do not pertain specifically to the late 1990's run-up in stock prices. Likewise, most of the studies cited on page 3 of Exhibit_(JRW-8), were conducted over long periods of time and therefore are not overly sensitive to the late 1990s. Furthermore, the surveys cited were all from the current year 2006.
- b. Whereas they do not specifically say, it is Dr. Woolridge's opinion that Greenspan's comments relate more to the short-term and Siegel's to the long-term.

WITNESS RESPONSIBLE: DR. J. RANDALL WOOLRIDGE

Question 7: Refer to page 6 and Exhibit JRW-2 of the Woolridge Testimony. Explain why an investor would forego the benefits of a tax cut and provide tacit approval to the company to lower dividend payouts to keep investors expected return equal to that before the tax cut.

Response:

Investors do not determine corporate dividend payout policy, companies do.

WITNESS RESPONSIBLE: DR. J. RANDALL WOOLRIDGE

Question 8: Refer to page 7 of the Woolridge testimony. Explain why it is appropriate to include Atmos in the proxy group of natural gas distribution companies.

Response:

Atmos meets Dr. Woolridge's selection criteria for inclusion into the group and hence, in Dr. Woolridge's opinion, there is no reason to exclude the company.

WITNESS RESPONSIBLE: DR. J. RANDALL WOOLRIDGE

Question 9: Refer to the Woolridge Testimony, pages 22 and 23.

- a. Explain how Dr. Woolridge's adjustment of multiplying dividend yields by one half the expected growth rate, as described on page 23, satisfies the necessary adjustment as described on page 22.
- b. Provide documentation and any official guidelines used by analysts that direct and instruct how dividend yields should be adjusted.

- a. Given the uncertainty regarding the magnitude of a dividend increase, as well as the timing of the dividend increase (does it occur in the next quarter or not?), it is Dr. Woolridge's opinion that his approach provides for a good approximation of the necessary adjustment.
- b. Dr. Woolridge is not aware of any official guidelines.

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WITNESS RESPONSIBLE: DR. J. RANDALL WOOLRIDGE

- 10. Refer to the Woolridge Testimony, page 26 and Exhibit JRW-7.
- a. Explain the pros and cons of using each of the data series of Earnings Per Share ("EPS"), Dividends Per Share ("DPS"), and Book Value Per Share ("BVPS") individually for calculating the growth in dividend figure to be used in the Discounted Cash Flow ("DCF") model.
- b. Explain how taking the collective average of the individual EPS, DPS, and BVPS series mean and median values provides a meaningful estimate of dividend growth as used in the DCF model.
- c. Explain why it is valid to use the calculated internal growth rate as a meaningful estimate of dividend growth as used in the DCF model.
- d. Explain why using internal growth as a proxy for dividend growth does not introduce a certain amount of circularity into the calculation.

- a. According to the DCF model, DPS, EPS, and BVPS should all have the same rate of growth. Over short-term periods of time, these growth rates may differ. Dr. Woolridge is attempting to gauge an overall long-term rate of growth for all three.
- b. See response to 10 a.
- c. See discussion on pages 24-25 of Woolridge Testimony.
- d. In a sense, it does. However, that is one reason that it is not the only growth rate measure considered in arriving at a DCF growth rate.

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Witness Responsible: J. RANDAL WOOLRIDGE

- 14. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the market to book ratio of KeySpan Energy as 153.
 - a. Does Dr. Wooridge consider that this measure shows that KeySpan is overpriced, underpriced, or priced correctly?
 - b. Would Dr. Woolridge recommend to a KeySpan stockholder to sell, buy, or hold their shares?

- a. Based on the market to book ratio alone, Dr. Woolridge does not believe you can state whether KeySpan is overpriced, underpriced, or priced correctly.
- b. Based on the market to book ratio alone, Dr. Woolridge does not believe you can recommend to a KeySpan stockholder to sell, buy, or hold their shares.

Witness Responsible: J. RANDAL WOOLRIDGE

- 15. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the S&P Bond Rating of KeySpan Energy as 'A+'.
 - a. Is AUS Utility Reports the source of this figure?

b. Did Dr. Woolridge confirm this with Standard & Poor's? Response:

- a. Yes.
- b. No.

Witness Responsible: J. RANDAL WOOLRIDGE

- 16. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the market to book ratio of Laclede Group as 167.
 - a. Does Dr. Wooridge consider that this measure shows that Laclede is overpriced, underpriced, or priced correctly?
 - b. Would Dr. Woolridge recommend to a Laclede stockholder to sell, buy, or hold their shares?

- a. Based on the market to book ratio alone, Dr. Woolridge does not believe you can state whether Laclede is overpriced, underpriced, or priced correctly.
- b. Based on the market to book ratio alone, Dr. Woolridge does not believe you can recommend to a Laclede stockholder to sell, buy, or hold their shares.

Witness Responsible: J. RANDAL WOOLRIDGE

- 17. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the market to book ratio of NICOR as 215.
 - a. Does Dr. Wooridge consider that this measure shows that NICOR is overpriced, underpriced, or priced correctly?
 - b. Would Dr. Woolridge recommend to a NICOR stockholder to sell, buy, or hold their shares?

- a. Based on the market to book ratio alone, Dr. Woolridge does not believe you can state whether NICOR is overpriced, underpriced, or priced correctly.
- b. Based on the market to book ratio alone, Dr. Woolridge does not believe you can recommend to a NICOR stockholder to sell, buy, or hold their shares.
Witness Responsible: J. RANDAL WOOLRIDGE

- 18. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the market to book ratio of Northwest Natural Gas Company as 155.
 - a. Does Dr. Woolridge consider that this measure shows that Northwest Natural is overpriced, underpriced, or priced correctly?
 - b. Would Dr. Woolridge recommend to a Northwest Natural stockholder to sell, buy, or hold their shares?

- a. Based on the market to book ratio alone, Dr. Woolridge does not believe you can state whether Northwest Natural is overpriced, underpriced, or priced correctly.
- b. Based on the market to book ratio alone, Dr. Woolridge does not believe you can recommend to a Northwest Natural stockholder to sell, buy, or hold their shares.

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Witness Responsible: J. RANDAL WOOLRIDGE

- 19. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the market to book ratio of Peoples Energy as 165.
 - a. Does Dr. Wooridge consider that this measure shows that Peoples Energy is overpriced, underpriced, or priced correctly?
 - b. Would Dr. Woolridge recommend to a Peoples Energy stockholder to sell, buy, or hold their shares?

- a. Based on the market to book ratio alone, Dr. Woolridge does not believe you can state whether Peoples Energy is overpriced, underpriced, or priced correctly.
- b. Based on the market to book ratio alone, Dr. Woolridge does not believe you can recommend to a Peoples Energy stockholder to sell, buy, or hold their shares.

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J. RANDAL WOOLRIDGE

20. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists Peoples Energy as comparable to Atmos Energy.

a. Is Dr. Wooridge aware that Peoples Energy is the target of an acquisition by WPS Resources?

b. If so, please describe all adjustments to his financial analysis in Exhibit JRW-7 to account for any biases associated with the merger.

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b. No adjustments were made.

Witness Responsible: J. RANDAL WOOLRIDGE

- 21. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists Peoples Energy as comparable to Atmos Energy. Dr. Woolridge lists the Return on Equity for Peoples as 2.1%.
 - a. Is AUS Utility Reports the source of this figure?
 - b. If the answer for part a is in the affirmative, then please state whether Dr. Woolridge confirmed this figure with AGL Resources' recent 10-K, 10-Q, or annual report?

- a. Yes.
- b. No.

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Witness Responsible: J. RANDAL WOOLRIDGE

- 22. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the percentage of revenues from gas utility operations as 78% for Piedmont Natural Gas.
 - a. Is AUS Utility reports the source of this figure?
 - b. If the answer for part a is in the affirmative, then please state whether Dr. Woolridge confirmed this figure with piedmont's recent 10-K, 10-Q, or annual report?
 - c. Does Dr. Woolridge know if the 78 percent gas revenue figure includes gas revenues from Piedmont's joint ventures, SouthStar Energy Services, Pine Needle LNG Company, Cardinal Pipeline Company, or Hardy Storage Company?
 - d. Does Dr. Woolridge know if the 78 percent gas revenue figure includes revenues that generated income from equity method investments?

- a. Yes
- b. No.
- c. According to *AUS Utility Reports*, the 78 percent figure is for regulated gas revenues. Therefore, Dr. Woolridge presumes that unregulated gas revenues are not part of the 78%.
- d. Se response to c.

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Witness Responsible: J. RANDAL WOOLRIDGE

- 23. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the market to book ratio of Piedmont Natural Gas as 193.
 - a. Does Dr. Wooridge consider that this measure shows that Piedmont is overpriced, underpriced, or priced correctly?
 - b. Would Dr. Woolridge recommend to a Piedmont stockholder to sell, buy, or hold their shares?

- a. Based on the market to book ratio alone, Dr. Woolridge does not believe you can state whether Piedmont is overpriced, underpriced, or priced correctly.
- b. Based on the market to book ratio alone, Dr. Woolridge does not believe you can recommend to a Piedmont stockholder to sell, buy, or hold their shares.

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Witness Responsible: J. RANDAL WOOLRIDGE

- 24. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the S&P Bond Rating of South Jersey Industries as 'A'.
 - a. Is AUS Utility Reports the source of this figure?

b. Did Dr. Woolridge confirm this with Standard & Poor's? Response:

a. Yes.

b. No.

Witness Responsible: J. RANDAL WOOLRIDGE

- 25. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the market to book ratio of South Jersey Industries as 183.
 - a. Does Dr. Wooridge consider that this measure shows that South Jersey is overpriced, underpriced, or priced correctly?
 - b. Would Dr. Woolridge recommend to a South Jersey stockholder to sell, buy, or hold their shares?

- a. Based on the market to book ratio alone, Dr. Woolridge does not believe you can state whether South Jersey is overpriced, underpriced, or priced correctly.
- b. Based on the market to book ratio alone, Dr. Woolridge does not believe you can recommend to a South Jersey stockholder to sell, buy, or hold their shares.

Witness Responsible: J. RANDAL WOOLRIDGE

- 26. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the market to book ratio of Southwest Gas as 144.
 - a. Does Dr. Wooridge consider that this measure shows that Southwest is overpriced, underpriced, or priced correctly?
 - b. Would Dr. Woolridge recommend to a Southwest stockholder to sell, buy, or hold their shares?

- a. Based on the market to book ratio alone, Dr. Woolridge does not believe you can state whether Southwest is overpriced, underpriced, or priced correctly.
- b. Based on the market to book ratio alone, Dr. Woolridge does not believe you can recommend to a Southwest stockholder to sell, buy, or hold their shares.

Witness Responsible: J. RANDAL WOOLRIDGE

- 27. Reference Schedule JRW-3 of the Direct Testimony of Dr. J. Randall Woolridge. Dr. Woolridge lists the market to book ratio of WGL Holdings as 143.
 - a. Does Dr. Wooridge consider that this measure shows that WGL is overpriced, underpriced, or priced correctly?
 - b. Would Dr. Woolridge recommend to a WGL stockholder to sell, buy, or hold their shares?

- a. Based on the market to book ratio alone, Dr. Woolridge does not believe you can state whether WGL is overpriced, underpriced, or priced correctly.
- b. Based on the market to book ratio alone, Dr. Woolridge does not believe you can recommend to a WGL stockholder to sell, buy, or hold their shares.

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Witness Responsible: J. RANDAL WOOLRIDGE

- 28. At page 28, lines 20 through 21 of the Direct Testimony of Dr. J. Randall Woolridge, he states, "E(Rm) represents the expected return on the overall stock market. Frequently, the 'market' refers to the S&P 500."
 - a. Is it Dr. Woolridge's understanding that the underlying theory of the Capital Asset pricing Model (CAPM) considers the expected return on the S&P 500 as the expected market return 'E(Rm)'?
 - b. If the response to part 'a' is in the affirmative, please provide all support for the response.
 - c. Is it Dr. Woolridge's understanding that the underlying theory of the Capital Asset pricing Model (CAPM) considers the expected return on the overall stock market as the expected market return 'E(Rm)'?
 - d. If the response to part 'a' is in the affirmative, please provide all support for the response.
 - e. Is it Dr. Woolridge's understanding that the underlying theory of the Capital Asset pricing Model (CAPM) does not consider the expected returns on assets like real estate as relevant in asset pricing?
 - f. If the response to part 'a' is in the affirmative, please provide all support for the response.
 - g. Is it Dr. Woolridge's understanding that the underlying theory of the Capital Asset pricing Model (CAPM) does not consider the expected returns on assets like investments in human capital and education as relevant for asset pricing?
 - h. If the response to part 'a' is in the affirmative, please provide all support for the response.

- a. No, but the return on the S&P 500 is considered as a proxy as the return on the market portfolio.
- b. No response.
- c. No, but the expected return on the overall stock market is considered as a proxy as the return on the market portfolio.
- d. No response.
- e. No, the expected market return does consider returns on assets like real estate.
- f. No response.

- g. No, the expected market return does consider returns on assets like investments in human capital.
- h. No response.

Witness Responsible: J. RANDAL WOOLRIDGE

29. At page 44, lines 5 through 7 of the Direct Testimony of Dr. J. Randall Woolridge, he states, " ... my expected market return is 8.10% which is composed of 3.25% expected inflation, 1.90% dividend yield, and 2.95% real earnings growth rate." Is it Dr. Woolridge's opinion that these are the only factors that investors might consider when pricing assets.

Response:

These are the factors identified by Ibbotson as the primary drivers of historic stock returns.

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Witness Responsible: J. RANDAL WOOLRIDGE

- 30. Reference Exhibit JRW-3, page 3 of 5 of the Direct Testimony of Dr. J. Randall Woolridge. Assume a beta of 0.50 and a risk-free rate of 5.0 percent.
 - a. Would the Claus Thomas risk premium (3.0%) produce an expected return of 6.50 percent?
 - b. Would the Arnott Bernstein risk premium (2.4%) produce an expected return of 6.20 percent?
 - c. Would the Seigel Thomas risk premium (2.5%) produce an expected return of 6.25 percent?
 - d. Would the Survey of Financial Forecasters risk premium (2.0%) produce an expected return of 6.00 percent?
 - e. Would the Graham and Harvey- CFOs risk premium (3.05%) produce an expected return of 6.53 percent?
 - f. Would the Ibbotson Chen risk premium (4.0%) produce an expected return of 7.0 percent?
 - g. Would the Woolridge risk premium (3.23%) produce an expected return of 6.62 percent?

- a. Yes.
- b. Yes.
- c. Yes.
- d. Yes.
- e. Yes.
- f. Yes.
- g. Yes.

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Witness Responsible: J. RANDAL WOOLRIDGE

- 31. Reference Exhibit JRW-3, page 3 of 5 of the Direct Testimony of Dr. J. Randall Woolridge. Assume a beta of 0.50 and a risk-free rate of 5.0 percent.
 - a. Is the 7.0 percent value listed under "SERIES: STOCK RETURNS (S&P 500) Median" reflected in the equity risk premium (2.0%) of the Survey of Financial Forecasters' on page 3 of 5 of Exhibit JRW-8?
 - b. Does Dr. Woolridge know if the 7.0 percent value listed under "SERIES: STOCK RETURNS (S&P 500) Median" includes a dividend yield for the S&P 500?
 - c. If the response to part 'b' is in the affirmative, please provide that value.

- a. Yes.
- b. Yes, Dr. Woolridge believes so. See Survey Responses in work papers.
- c. Yes, the dividend yield is not provided separately.

Witness Responsible: J. RANDAL WOOLRIDGE

- 32. On page 52 of the Direct Testimony of Dr. J. Randall Woolridge, he says, "... Professor Woolridge is the Director of the Smeal College Trading Room and President and CEO of the Nittany Lion Fund, LLC."
 - a. When did Dr. Woolridge become the President and CEO of the Nittany Lion Fund, LLC?
 - b. During the period when Dr. Woolridge has served as the President and CEO of the Nittany Lion Fund, LLC, has the Fund invested in or maintained a position in the common stock equities of any utilities?
 - c. If the response to part 'b' is in the affirmative, please identify those utilities in which the Nittany Lion Fund, LLC has or had positions and provide all analysis associated with the funds decision to acquire or liquidate those shares.
 - d. If the response to part 'b' is in the affirmative, please provide the date when the common stocks of utilities were acquired and the market price paid for the common equities.

- a. September, 2004.
- b. Yes.
- c. Since the Nittany Lion Fund, LLC is structured as a private limited liability corporation, Dr. Woolridge is not at liberty to discuss the Fund's present or past holdings.
- d. See response to c.

Witness Responsible: J. RANDAL WOOLRIDGE

33. Please provide the work papers associated with Dr. J. Randall Woolridge's direct testimony and schedules.

Response:

The work papers are included on the CD.

Witness Responsible: J. RANDAL WOOLRIDGE

34. Please provide the data in both hard copy and electronic format (Excel) for the three charts in the direct testimony of Dr. J. Randall Woolridge at page 12, line 11 through page 13, line 27.

Response:

The data are provided in the work papers on CD and a hard copy of the electronic file Gas Co Capital Structure is attached.

Long-term debt ATG CGC CGC KSE LG GAS NWN PGL PGL SJI	Average Sum	NJR SWX UGI	SJI APU EGN	ATO CGC KSE LG GAS NWN	Average Sum Current portion of long-term debt	GAS PGL SJI APU APU SWX SWX UGI	Short-term debt ATG ATO CGC KSE
					ong-term debt		
4th Quarter 1, 615,000 2,1181,500 3,920,500 3,941,400 486,400 521,500 895,210 895,210 895,210 895,210 895,210	61,116 1,038,970	3,470 126,850 83,210 423,000	35,000 2,360 152,840 15,000	3,290 8,000 8,000 8,000 9,0000 9,0000 9,00000000	329,106 5,594,810 4th Quarter 0	134,700 134,700 193,500 149,660 188,800 152,840 168,000 551,670 586,650 107,210 586,200	2005 4th Quarter 522,000 4777,350,00 670,600 670,600 309,460
3rd Quarter 1,616,000 2,183,100 173,840 3,914,500 3,41,380 496,300 594,000 594,000 895,580 625,000 3119,100	43,312 736,310	3,250 126,650 81,030 252,000	35,000 2,350 50,120 118,090 15,000	3,260 40,060 8,000 8,000 0 0 0 0 0 0	150,015 2,550,260 3rd Quarter 0	144,000 8,000 8,150 73,850 91,000 118,090 118,090 15,000 177,350 399,650 399,650 349,400	2005 3rd Quarter 344,000 148,070.00 12,500 321,500 1110,670
2nd Quarter 1, 621,000 2, 183,640 148,900 3,415,400 3,40,410 496,900 521,500 897,110 897,110 897,110 319,130	29,552 502,380	3,290 900 31,250 208,700	0 2,350 50,120 118,690	3,240 5,000 40,100 27,240 0	91,755 1,559,830 2nd Quarter 0	27,240 15,200 55,870 76,790 133,690 10,000 196,940 152,900 152,900 152,900 289,700	2005 2nd Quarter 172,000 3,240,00 22,2000 285,500 87,510
1st Ouarter 1,618,000.00 2,254,820.00 3,914,200.00 3,914,200.00 3,914,200.00 3,914,200.00 497,000.00 493,880.00 495,650.00 660,000.00 321,410.00	32,785 557,340	3,340,00 76,990,00 40,250,00 172,200,00	2,350,00 90,620,00 59,110,00 10,000,00	6,890.00 76,500.00 90.00 15,000.00 15,000.00	96,052 1,632,880 1st Quarter 0.00	25,500,000 25,500,000 34,750,00 71,110,00 10,640,00 195,990,00 249,400,00 249,400,00	2005 1st Quarter 38,000.000 5,890.000 18,500.000 547,400.000 86,320.000
4th Quarter 1,623,000.00 2,255,170.00 128,050.00 4,418,730.00 380,360.00 484,030.00 484,030.00 484,030.00 660,000.00 328,910.00	33,649 572,030	3,100.00 124,190.00 29,820.00 175,900.00	5,350.00 60,610.00 60,420.00 10,000.00	5,900,00 10,000,00 71,400,00 140,00 15,000,00 15,000,00 0,00	242,412 4,121,000 4th Quarter 0.00	490,200,00 117,500,00 172,060,00 97,650,00 97,650,00 90,420,00 145,000,00 281,690,00 129,820,00 129,820,00 306,100,00	2004 4th Quarter 334,000:000 34,690:000 55,000:000 983,650:000 1777,450:000
3rd Quarter 1,216,000.00 867,310.00 128,900.00 4,423,860.00 380,340.00 796,700.00 484,910.00 987,380.00 987,380.00 660,000.00 327,010.00	37,821 642,960	27,740.00 260,730.00 30,910.00 122,800.00	5,270.00 60,640.00 10,000.00	14,000.00 16,140.00 25,150.00 200.00 0.00 0.00	181,851 3,091,460 3rd Quarter 3,400.00	930,200,00 97,700,00 109,500,00 165,270,00 165,270,00 223,000,00 512,730,00 512,730,00 512,730,00 512,730,00 512,730,00	2004 3rd Quarter 85,000,000 5,510,000 47,500,000 591,520,000 96,5300,000
2nd Quarter 982.000.00 863,270.00 5,182,660.00 380,310.00 496,600.00 946,500.00 946,300.00 946,300.00 946,300.00 946,300.00 946,300.00 946,300.00 946,300.00 946,300.00 946,300.00	43,555 740,430	27,660.00 366,410.00 6,980.00 116,400.00	5,270.00 59,470.00 10,000.00	16,470,00 16,470,00 200,00 0,00 0,00	104,633 1,778,760 2nd Quarter 34,000,00	4.300.00 50,000.00 27,000.00 45,970.00 122,660.00 59,470.00 10,000.00 10,000.00 690,210.00 60,210.00 165,300.00	2004 2nd Quarter 195,000,00 5,920,00 32,000,00 56,470,00 36,620,00
1st Quarter 970,200.00 864,620.00 5,537,460.00 281,060.00 281,060.00 496,700.00 846,330.00 846,300.00	63,036 1,071,610	27, 840.00 734,750.00 5,770.00 95,800.00	5,270,00 32,170,00 58,950,00 10,000,00	31,000,00 1,470,00 25,150,00 0,00 0,00 0,00 0,00	142,891 2,429,150 1st Quarter 33,500.00	22,2900,00 50,000,00 2,000,00 49,370,00 146,740,00 58,950,00 43,690,00 986,250,00 158,100,00	2004 1st Quarter 133,100,00 8,090,00 31,000,00 295,620,00 216,570,00
4th Quarter 956,000.00 860,710.00 138,930.00 5,611,430.00 279,640.00 486,900.00 846,300.00 846,300.00 660,000,00 308,780.00	22,080 375,360	21,730,00 75,850,00 6,430,00 65,300,00	5,270.00 12,170.00 58,940.00 10,000.00	26,000,000 1,470,00 0,00 0,00 0,00 0,00 0,00 0,00 0,	41h Quarter 77,000.00	86,200,00 242,920,00 1126,000,00 118,070,00 58,940,00 21,000,00 21,000,00 286,660,00 286,660,00 411,600,00	2003 4th Quarter 383,000.00 198,990.00 285,620.00 655,620.00 265,580.00
3rd Cuarter 1,130,200.00 142,530.00 142,530.00 304,620,00 304,620,00 304,620,00 304,620,00 398,400.00 450,790,00 744,340,000,00 328,560,00	19,734 335,470	-2,450,00 67,190,00 7,070,00 65,000,00	8,420,00 58,710,00 20,000,00	22,000,00 11,420,00 0,00 7,880,00 7,880,00 2,000,00	210,000 3,706,930 3rd Quarter 42,000.00	92,800,00 207,950,00 557,060,00 170,820,00 178,840,00 58,710,00 59,000,00 188,250,00 357,190,00 7,7070,00 121,600,00	2003 3rd Quarter 169,200,00 127,540,00 25,800,00 542,420,00 542,420,00 542,420,00
2nd Quarter 765,600.00 864,350.00 142,350.00 3904,610.00 3904,610.00 396,400.00 396,400.00 396,400.00 2450,860.00 744,340.00 265,630.00	31,888 542,090	98,320.00 8,000.00 124,600.00	8,420,00 28,200,00 23,000,00 23,000,00	111,420.00 35,000.00 35,000.00 25,000.00 25,000.00	2,547,000 2nd Quarter 30,000.00	51,600,00 152,000,00 47,000,00 103,620,00 66,620,00 60,990,00 53,000,00 106,990,00 106,990,00 106,990,00 106,990,00 106,990,00 139,000,00	2003 2nd Quarter 242,800,00 10,450,00 0,00 688,750,00 128,860,00 335,000,00
1st Quarter 767,000.00 864,230.00 164,930.00 4,740,230.00 259,570.00 259,570.00 396,300.00 485,930.00 485,930.00 629,340.00 462,000.00 273,020.00	41,074 698,260	108,200,00 8,610,00 123,900,00	10,700.00 26,220.00 60,670.00 23,000.00	20,000 11,410,00 25,000,00 20,000,00 20,000,00 90,000,00 47,000,00	2,743,680 1st Quarter 30,000.00	20,000,00 242,000,00 96,000,00 138,950,00 60,670,00 88,000,00 240,000,00 161,300,00	2003 1st Cluarter 166,800.00 38,860.00 927,110.00 927,110.00 147,390.00

Sheet 1 1 of 9 Response to Atmos 34

Con 1	Average	APU NJR SUG SWX UGI	PNY SJI WGL	GAS NWN PGL	LG KSE	Total capitalization	Average Sum	UGI	SMX	NJR	EGN	WGL	SII	PGL	GAS	LG	CGC	ATG ATO	Common shareholder's equity	Average		UGI	SUG	NJR	APU	W/Ci
	ω					45	5 -									4	.		4th (18			N			
2005	2,206,944	1,575,910 861,580 3,903,210 2,076,030 2,665,300	1,509,190 710,650 1,510,350	1,297,700 1,108,430 1,697,310	290,160 8,400,200 733,990	4th Quarter 3, 152,000	1,037,938 17,644,950	1,012,800	751,140	526,150	892,680	921,760	884,190 391,180	802,100	811,300	392,580	124,430	1,499,000 1,637,620	4th Quarter	1,072,000	070 000	1,324,900 1,454,500	2,049,140	335,420	759,790	560 410
2005	2,177,589 34,841,420	1,413,710 755,260 4,012,530 2,000,600 2,596,400	1,530,310 687,670 1,506,310	1,277,200 1,164,500 1,695,740	292,460 8,317,300 707,910	3rd Quarter 3,098,000	1,015,101 17,256,710	997,600	1,703,200 751,410	438,050	753,780	993,990 099,598	905,310 368,220	800,150	780,900	366,520	118,610	1,451,000 1,602,420		18,206,490	1 020 020	1,249,190	2,049,300	317,200	795,410	584 150
2005	2,211,546 35,384,740	1,544,530 836,230 4,110,400 2,028,810 2,604,600	1,590,980 687,050 1,474,320	1,286,800 1,113,330 1,776,830	284,040 8,411,600 725,570	2nd Quarter 3,110,000	1,037,056 17,629,960	979,300	.765,620	518,130 + 703 040	851,610	922,460 973 850	367,650 361,960	879,720	789,900 501 940		125,140 4 493 500	1,457,000 1,616,010	2nd Quarter	18,353,490	1 079 617	1,2/3,190		318,090	795,660	523,690
2005	2,282,563 34,238,443	1,491,688.00 823,838.00 4,095,790.00 2,004,361.00 2,754,700	1,579,183.00 1,483,238.00	1,273,400.00 1,083,256.00 1,781,000.00	287,260.00 7,981,500.00 749,978.00	1st Quarter 3,064,000.00 3 794 951 00	1,015,964 17,271,380	1,020,200.00	742,230.00	517,000.00 1 698 370 00	789,790.00	945,490.00 359 220 00	367,960.00	877,800,00	776,400.00	382,630.00	128,360,00	1,446,000.00 1,632,270.00	1st Quarter	18,219,770	1.071.751	1,520,300.00			540,400.00	523,690,00
2004	1,916,140 32,574,376	1,416,557.00 783,804.00 3,412,878.00 1,968,612.00 2,650,700	1,514,898.00 675,016.00 1,471,761.00 289.038.00	1,246,000.00 1,052,544.00 1,767,460.00	251,840.00 8,333,139.00 737,359.00	4th Quarter 3,008,000.00	939,319 15,968,430	919,000.00	705,680.00	506,970.00	803,670.00	881,640.00 277.040.00	344,410.00	883,790.00	749,100.00 568.520.00	368,510.00	122,940.00	1,385,000.00	4th Quarter	18,920,030	1.112.943	1,561,900.00	2,074,690,00	319,870.00	840,810,00 612 890 00	573,720.00
2004	1,990,037 29,850,553	1,248,214.00 798,265.00 3,567,910.00 1,926,312.00 2,559,800	1,542,998.00 665,616.00 1,505,535.00	1,033,230.00	247,410.00 8,239,094.00 750,174.00	3rd Quarter 2,239,000.00 1,790,112.00	866,802 14,735,630	834,100.00	661,660.00	467,920.00	735,350.00	863,420.00 289.040.00	336,920.00	870,080.00	726,300.00 548.320.00	355,920.00	118,510.00	1,133,460.00	3rd Quarter	17,342,970	1,020,175	1,547,300.00	2,004,410.00	315,890.00	841,280.00 512.870.00	590,160.00
2004	2,033,636 30,504,537	1,276,518.00 807,552.00 3,434,758.00 1,892,898.00 2,704,400	1,501,203.00 642,229.00 1,552,343.00	1,063,077.00	256,390.00 9,182,378.00 607,354.00	2nd Quarter 1,973,000.00 1,797,473.00	868,204 14,759,470	925,700.00	667,130.00	481,460.00 918,440.00	753,640.00	887,970.00 350,300.00	338,530.00	890,550.00	754,300.00 563,000.00	368,760.00	122,460.00 3,916,380.00	926,850.00	2nd Quarter	30,422,870	1,789,581	1,573,800.00	2,041,450.00	316,810.00	8,421,100.00 522,870.00	5,893,900.00
2004	1,904,235 30,467,762	1,295,230,00 671,143,00 3,180,910,00 1,890,249,00 2,721,500	635,313.00 1,508,523.00 277,040.00	1,032,868.00	258,970.00 9,453,415.00 590,082.00	1st Quarter 1,972,100.00 1,740,057.00	1,708,096 29,037,640	894,500,00	6,698,400.00	490,240.00 920,420.00	742,360.00	906,270.00 347,790.00	329,340.00	906,570.00 901 260.00	754,600.00 532,740.00	325,180.00	3,832,530.00	9,328,500.00	1st Quarter	17,510,310	1,030,018		1,711,650.00 1 220 410 00	317,310.00	866,760.00	617,900.00
2003	1,752,256 29,788,359	1,251,874.00 676,840.00 2,959,896.00 1,851,631.00 1,920,000	608,432.00 1,483,041.00 253,683.00	1,231,300,000 1,006,635,00 1,592,344,00	257,550,00 9,356,948,00 604,955,00	4th Quarter 1,901,400.00 1,721,435.00	761,924 12,952,700	ons'onn'nn	630,470.00	438,050,00 691,540.00	699,030,00	842,740.00 282,250.00	297,960.00	862,580.00	50,620.00	309,180.00	3,670,660.00	879,350.00	4th Quarter	16,168,810	951,106	1,161,600.00	1,106,370.00	233,090.00	867,100.00 552,840.00	367,610.00
2003	1,724,383 29,314,504	1,188,969.00 708,760.00 3,416,606.00 1,799,516.00 1,811,800	585,867.00 1,502,380.00 316,126.00	939,960.00 1,620,003.00	255,490.00 8,584,406.00 614,376.00	3rd Quarter 2,038,700.00 1,691,801.00	746,626 12,692,650	A01001	595,420.00	711,620.00	685,940.00	818,220.00 253,680.00	255,620.00	848,000.00 630,200.00	489,170.00	299,070.00	3,573,290.00	857,520.00	3rd Quarter	15,439,770	908,222	1,178,500.00	1,041,260.00	257,900.00	868,580.00 503,030.00	636,650.00
2003	1,608,263 27,340,465	1,166,085.00 694,090.00 1,884,733.00 1,760,858.00 1,889,300	525,950.00 1,519,655.00 293,668.00	1,100,000.00 959,429.00 1,491,386.00 1 126 507.00	283,730.00 8,577,826.00 617,691.00	2nd Quarter 1,821,000.00 1,571,957.00	726,883 12,357,010	an Analon	595,420.00	679,920.00	653,080.00	850,900,00 316,130,00	258,690.00	875,660.00 645,140.00	501,070.00	308,510.00	3,588,520.00	827,450.00	2nd Quarter 845 900 00	14,968,310	880,489	1,135,900.00	1,204,090.00	273,670.00	868,930.00 513,010.00	623,300.00
2003	1,582,167 26,896,837	1,139,645.00 730,102.00 1,852,880.00 1,750,923.00 1,870,500	530,732.00 1,453,339.00 282,252.00	996,976.00 1,344,144.00 1.104.329.00	287,810.00 8,437,229.00 601,327,00 1 153 900 00	1st Quarter 1,878,800.00 1,482,049.00	739,482 12,571,190		612,990.00 569 100 00	685,350.00	626,660.00 494 970.00	293,670.00	256,030.00	862,040.00 664,510.00	502,800.00	295,490.00	3,613,150.00	707,730.00	1st Quarter 710.100.00	14,800,930	870,643	1,133,300.00	1,147,870.00	269,120.00	889,640.00 512,980.00	623,260.00

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Sheet 1 2 of 9 Response to Atmos 34

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Sheet 1 3 of 9

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Average of Ratios Short-term debt Current portion of long-term debt Long-term debt <u>Common shareholder's equity</u> <u>TOTAL</u>		Common shareholder's equity	Long-term debt	Current portion of long-term debt	Short-term debt	Ratios	Total Average Capital	Common shareholder's equity	Long-term debt	Current portion of long-term debt	Short-term debt	Average Totals	Total Capital	Total Capitalization	Common shareholder's equity	Long-term debt	Current portion of long-term debt	Short-term debt	Totals
8.05% 1.69% 47.91% 42.35% 100.00%	100%	41.50%	42.90%	2.44%	13.16%	4th Quarter	2,501,044	1,037,938	1,072,883	61,116	329,106	4th Quarter	42,517,740	35,311,100	17,644,950	18,239,010	1,038,970	5,594,810	4th Quarter
	100%	44.53%	46.98%	1.90%	6.58%	3rd Quarter	2,279,398	1,015,101	1,070,970	43,312	150,015	3rd Quarter	38,749,770	34,841,420	17,256,710	18,206,490	736,310	2,550,260	3rd Quarter
	100%	46.34%	48.24%	1.32%	4.10%	2nd Quarter	2,237,980	1,037,056	1,079,617	29,552	91,755	2nd Quarter	38,045,660	35,384,740	17,629,960	18,353,490	502,380	1,559,830	2nd Quarter
	100%	45.84%	48.35%	1.48%	4.33%	1st Quarter	2,216,551	1,015,964	1,071,751	32,785	96,052	1st Quarter	37,681,370	34,238,443	17,271,380	18,219,770	557,340	1,632,880	1st Quarter
	100%	40.34%	47.80%	1.45%	10.41%	4th Quarter	2,328,323	939,319	1,112,943	33,649	242,412	4th Quarter	39,581,490	32,574,376	15,968,430	18,920,030	572,030	4,121,000	4th Quarter
	100%	41.15%	48.43%	1.80%	8.63%	3rd Quarter	2,106,648	866,802	1,020,175	37,821	181,851	3rd Quarter	35,813,020	29,850,553	14,735,630	17,342,970	642,960	3,091,460	3rd Quarter
	100%	30.94%	63.78%	1.55%	3.73%	2nd Quarter	2,805,972	868,204	1,789,581	43,555	104,633	2nd Quarter	47,701,530	30,504,537	14,759,470	30,422,870	740,430	1,778,760	2nd Quarter
	100%	58.02%	34.99%	2.14%	4.85%	1st Quarter	2,944,042	1,708,096	1,030,018	63,036	142,891	1st Quarter	50,048,710	30,467,762	29,037,640	17,510,310	1,071,610	2,429,150	1st Quarter
	100%	38.62%	48.21%	1.12%	12.04%	4th Quarter	1,972,697	761,924	951,106	080'ZZ	237,587	4th Quarter	33,535,850	29,788,359	12,952,700	16,168,810	3/5,360	4,038,980	4th Quarter
	100%	39.45%	47.99%	1.04%	11.52%	3rd Quarter	1,892,636	/46,626	222,806	19,/34	218,055	3rd Quarter	32,1/4,820	29,314,504	12,692,650	15,439,770	335,470	3,706,930	3rd Quarter
	100%	40.63%	49.21%	1.78%	8.3/%	2nd Quarter	1,/89,083	120,000	300,489	31,665	749,824	2nd Quarter	30,414,410	27,340,400	12,357,010	14,968,310	542,090	2,547,000	2nd Quarter
	100%	40.80%	48.03%	2.27%	8.90%	1st Quarter	1,812,392	1 040 500	700,043	41,074	101,393	1st Quarter	30,814,000	20,090,007	12,5/1,190	14,800,930	002,000	2,743,000	1st Quarter

GAS			KSH	CGC	ATO	ATG	Long-term debt	Sum	Average		UGI	SWX	SUG	NJR	EGN	APU	WGL	SJI	PNY	PGL	NWN	GAS	6	KSE	CGC	ATO	ATG	Current portion of long-term debt		Sum	Averane	UGI	SWX	SUG	RIN	EGN	APU	WGL	SJI	PNY	PGL	NWN	GAS	LG	KSE	080	ATO	ATG	Short-term right	
						ADD. DOC. AND AND ADD. DOC ADD. ADD. ADD. ADD. ADD. ADD. ADD. ADD																						erm debt																		7 1 2 4				
501,500	100 000	341.270	3,920,000	165,600	2,181,120	1,458,000	1st Quarter	1,075,290	63,252		57,000	82,990	575,120	3,400	15,000	3,090	2,360	2,360	35,000	0	28,000	50,000	40,100	10,500	9,000	3,310	156,000	1st Quarter		5,434,040	319,649	UDR'LEL	82,990	2,480,120	91,900	70,000	3,090	124,460	124,460	385,000	166,190	78,400	138,000	241,710	510,300	B,000	265,620.00	472,000	1st Quarter	2006
521,500	405.400	341.400	3,920,800	165,730	2,181,500	1,615,000	4th Quarter	1,038,970	61,116		423,000	83,210	126,650	3,470	15,000	152.840	75,090	2,300	35,000		nnia 1	onn'ne	=0,000	10,000	12 000	000 8	3000	4th Quarter		5,594,810	329,106	002'500	012/201	548,650	351,670	168,000	152,840	385,800	149,660	193,500	177,270	134,700	636,000	309,460	670,600	26,900	477,350.00	522,000	4th Quarter	2005
594,000	495 200	341,380	3,914,500	173,840	2,183,100	1,616,000	3rd Quarter	736,310	43,312		252,000	81,030	126,650	3,250	15,000	UED'ELL	50,120	000,52	nnn'er.		umio	• • •	o oooto n	40.050	ŝ		096 E	3rd Quarter		2,550,260	150,015	ort, tru	110,000	000,000	1/7,350	15,000	118,090	91,000	73,850	119,000	8,150	8,000	144,000	110,670	321,500	12,500	148,070.00	344,000	3rd Quarter	2005
521,500	496 900	340,410	3,915,400	158,900	2,183,640	1,621,000	2nd Quarter	502,380	29,552		208,700	1250	006 006	3,290	10,000	0000	140 cm	50 100 C1000	2.950 C		0 61,240	07940	0 101	40100	1500	5000	3240	2nd Quarter		1,559,830	91,755	-00, m		152,900	0.000	conduct.	133,690	76,790	55,870	0	15,200	27,240	0	87,510	285,500	22,000	3,240.00	172,000	2nd Quarter	2005
483,880.00	497.000.00	380,390.00	3,914,200.00	158,900.00	2,254,820.00	1,618,000.00	1st Quarter	557,340	32,785		172,200.00	40,250.00	10,920,00	3,340.00	0,000,01	10 000 00	50 110 00	50,000 VG	0.00	0.00	000	150000	000	90.00	76.500.00	5.000.00	5.890.00	1st Quarter	I	1,632,880	96,052		240 400 00	196,330.00	100,040.00	10,000.00	71,110.00	173,530.00	34,750.00	0,00	0.00	25,500.00	34,600.00	86,320.00	547,400.00	18,500.00	5,890.00	36,000.00	1st Quarter	2005
	496,900.00	380,360.00	4,418,730.00		دد <u>ا</u>	1,623,000.00	4th Quarter	572,030	33,649	2000	175,900.00	22,020,00	00.000 (121)	404 400 00	10,000	10,000,00	50,010,00	60 610 00	5 350 00	0.00	0.00	15,000,00	200.00	140.00	71,400.00	10,000.00	5,900.00	4th Quarter 0.00	•	4,121,000	242,412		308 100 00	120 820 00	293,100.00	2023 100 00	90,420.00	221,180.00	00.000'76	189,500.00	172,050.00	117,500.00	490,200.00	177,450.00	983,650.00	55,000.00	34,690.00	334,000.00	4th Quarter	2004
	497,700.00) 380,340.00	4			1,216,000.00	3rd Quarter	042,900	640 000	100 10	122,800.00	00.010.00	30 910 00	00.067.036	27 740 00	10 000 00	50 070 00	R0 R40 00	5 270.00	000	0.00	0.00	200.00	25,150.00	16,140.00	14,000.00	5,910.00	3rd Quaner 3,400.00		3,091,460	181,851	Construct Device California (VET a Meruan Primare	220,900,00	00.006 89	E40 730 00	287 440 00	20,070,00	100,270,00	10,070,00	108,000.00	35,520.00	97,700.00	390,200.00	96,530.00	591,520.00	47,500.00	5,910.00	85,000.00	3rd Quarter	2004
) 496,600.00		ċ		863,270.00	962,000.00	2nd Quarter	1-101-100	740,020	10 555	110,400.00	118 400 00	00 086 9	365.410.00	27 680.00	10.000.00	59 470.00	60.650.00	5,270.00	0.00	0.00	0.00	200.00	0.00	16,470.00	31,000.00	5,920.00	2110 Qualter 34,000.00		1,778,760	104,633		165,300.00	60.980.00	500 210 00	120.060.00	10,000,00	E0 470 00	00.043.00F	AE 070 00	20,000,00	4,900.00	129,200.00	3,620.00	56,470.00	32,000.00	5,920.00	195,000.00	2nd Quarter	2004
500,130.00	496,700.00		ų				1st Quarter		1 071 610	960 69	00,000,00	95 800 00	5.770.00	734.750.00	27.690.00	10.000.00	58,950.00	32,170.00	5,270.00	2.000.00	0.00	0.00	0.00	25,150.00	1,470.00	31,000.00	8,090.00	33,500.00		2,429,150	142,891		158,100.00	29,770.00	986.250.00	43,690.00	10 000 00	58 950 00	146 740 00	49 370 00	2000.00	50 000 00	187,000.00	00.00 Cat 2	295,620.00	31,000.00	8,090,00	133,100.00	1st Quarter	2004
500,320.00	496,900.00		ç	00.000,001	100011/10100	930,000,00	4th Quarter		375.360	080.66	and a local de la	65.300.00	6,430.00	75,850.00	27,730.00	10.000.00	58,940.00	12,170.00	5,270.00	2,000.00	0.00	0.00	0.00	0.00	1,470.00	26,000.00	7,200.00	77,000.00	Ath Ouerter	4,471,040	263,002		411,600.00	58,440.00	285,650.00	326,830.00	21.000.00	58 940.00	198.440.00	118.070.00	557 080 00	949 920 00	3/3,000.00	E7E 000 00	222,020,00	20,000,00	198,990.00	383,000.00	4th Quarter	2003
) 450,790.00	398,400,00		.,	▶	00.060 671	1,130,200.00	3rd Quarter		335,470	19.734		65,000.00	7,070.00	67,190.00	2,450.00	20,000.00	58,710.00	12,180.00	8,420.00	2,000.00	0.00	7,680.00	0.00	0.00	11,420.00	22,000.00	9,350.00	42,000.00	and Quarter	3,190,070	188,051		121,600.00	7,070.00	357,190.00	188,250.00	59,000.00	58,710.00	178,840.00	104,820.00	47.000.00	207.950.00	030,000.00		00.000 810	EAD ADD DD	25 800 00	169,200.00		2003
) 450,860.00	396,400.00			Þ		954 350 00	2nd Quarter		542,090	31,888	Second	124,600.00	8,000.00	98,320.00	2,390.00	23,000.00	60,990.00	28,200.00	8,420.00	2,000.00	0.00	35,000.00	0.00	0.00	111,420.00	0.00	9,750.00	30,000.00	2nd Quarter	000,140,2	749,824		139,500.00	800,00	329,020.00	106,990.00	53,000.00	60,990.00	66,620.00	133,620.00	47,000.00	152.000.00	51 600 00	335 000.00	128 860.00	699 750 nn	0.00	10 450 00		2003
485,930.00				A		864 230.00	1st Quarter		698,260	41,074		123,900.00	8,610.00	108,200.00	2,390.00	23,000.00	60,670.00	28,220.00	10,700.00	47,000.00	90,000.00	20,000.00	100,000.00	25,000.00	11,410.00	0.00	9,160.00	30,000.00	1st Quarter	E, 140,000	0 743 680	404 000	161,300.00	8,610.00	240,000.00	70,690.00	88,000.00	60,870.00	138,950.00	96,300.00	47,000.00	242,000.00	20.000.00	290.000.00	147,390.00	927 110 00	0.00	38 860.00	tee ann n	2003 1st Quarter

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SMX	NJR	EGN	APU	WGI		PGL	NAM		GAS	91	KSE	CGC	ATO	ATG	Total capitalization	Sum	Average	UGI	SWX	SUG	NJR	EGN	APU	WGL	SI	PNY	PGI.	GAS	91	KSE	CGC	ATO			Sum	Average	UGI	SWX	SUG	NJR	EGN	APU	WGL	SI	PNY	PGL
2,127,680	UP6 137 5	951,990		1.711,790	755 420	1.556.486	1 1717 AV	1 120 410	1,319,200	751,640	8,560,800	296,360	3,887,410	3,076,000	1st Quarter	18,161,520	1,068,325	t,111,000	chaiter	1,707,990	617,530	1,028,530	360,570	419,550	419,550	000'666	843,970	618,910	410,370	4,625,500	130,760	1,706,290	ny 1,585.000	2	17,677,860	1,039,874	1,636,800	1,329,080	1,523,350	334,460	683,260	932,500	335,430	335,430	625,000	
2,076,030	012 EUG E	1,575,910		1,510,350	710,650	1.509.190	1.697.310	1,108,430	1,297,700	733,990	8,400,200	290,160	3,819,110	3,152,000	4th Quarter	17,644,950	1,037,938	1,014,000	1012 000	1,824,070	526,150	892,680	322,920	921,760	391,180	884,190	802,100	586.930	0.06 118	4,464,100	124,430	1,637,620	1,499,000	4th Quarter	18,239,010	1,072,883	1,454,500	1,324,900	2,049,140	336,420	683,240	759,790	560,410	. 319,070	625,000	
2,000,600	4 012 530	1,413,710 755 280		1,506,310	687,670	1,530,310	1.695.740	1,164,500	1,277,200	707,910	8,317,300	292,450	3,785,530	3,098,000	3rd Quarter	17,256,710	1,015,101	0001100	007-000	1,135,230	nen'sev	753,780	337,420	066'668	368,220	905,310	800,150	570,500	006 UB2 07C'000	4,387,600	118,610	1,602,420	1,451,000	3rd Quarter	18,206,490	1,070,970	000,260,1	1,249,190	2,049,300	002,716	659,940 .	795,410	584,150	319,100	625,000	
2,028,810	4,110,400	1,544,530		1,474,320	687,050	1,590,980	1,776,830	1,113,330	1,286,800	725,570	8,411,600	284,040	3,799,650	3,110,000	2nd Quarter	17,629,960	1,037,056	and re-	006 626	755 620	1 200 100	510 100	273,850	922,460	367,650	930,980	879,720	591,840	789.900	4,483,500	125,140	1,616,010	1,457,000	2nd Quarter	18,353,490	1,079,617	nnoloch'l	1,213,180	2,177,000	000,015	000 010	795,660	523,680	319,130	860,000	
	4	1,491,688.00		1,483.238.00		1,570,183.00	1,781,000.00	1,083,256.00	1,273,400.00	749,978.00	7,981,500.00	287,260.00	3,794,251.00	3,064,000.00	1st Quarter	17,271,380	1,015,964		1 020 200 00	742 230 00	00.000,110	247 000 00	359,220.00	945,490.00	367,960.00	930,980.00	877,800.00	599,380.00	776,400.00	4,067,300.00	128,360.00	1,632,270.00	1,446.000.00	1st Quarter	18,219,770	1,071,751	1,000,000,000	1,202,100,00	4 082 100 00	00.000,010	092,900.00	540,400,00	523,690.00	321,410.00	660,000.00	
0 1,968,612.00	ω) 1,410,337.00) 783,804.00			675,016.00			1,052,544.00	1,246,000.00		8,333,139.00	251,840.00	1,994,770.00	3,008,000.00	4th Quarter	15,968,430			919,000,00	705,680,00	1 108 190 00	505 970 00	277,040.00	881,640.00	344,410.00	910,180.00	863,790.00	568,520.00	749,100.00	368 510 00	122,940.00	1,539,080.00	1,385,000.00	4th Quarter	18,920,030	1,112,943	ananti anti	1 581 900 00	1 262 940 00	0 074 F90 00	010789150	613 800 00	5/3,/20.00	328,910.00	660,000.00	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
	ω) 1,240,214,00) 798,265.00) 665,618.00		1,736,883.00	1,033,230.00			.0		_		3rd Quarter	14,735,630	866,802		834,100.00	661,660,00	1.176.500.00	467 920 00	735 950 00	883,420,00	3:36,920,00	854,900.00	870,080.00	548,320.00	726,300.00	355.920.00	118,510.00	1,133,460.00	1,023,000.00	3rd Quarter	17,043,970	1,002,586		1.547.300.00	1 264 650 00	2 004 4 10 00	315 890 00	512 870 00	00.000	00.010,725	00,000,000	UU WW 400
) 1,892,898.00	ω		1 4 978 518 00	1,505,540.00) 642,229.00) 1,752,904.00	1,063,077.00			, e				-	14,/59,4/0			925,700.00	667,130.00	918,440.00	481,460.00	330,300.00	00.076,789	338,530.00	883,000.00	890,550.00	553,000.00	754,300.00	368,760.00	20102,400.00	926,850.00	1,011,000.00	2nd Quarter	17,539,370	1,031,728		1.573,800.00	1 225,770.00	2.041,450.00	316.610.00	522 870.00	942 110 00	302,010,00	302 010 00	OU UUU vas
) 1,890,249.00	3,180,910.00		277,040.00	<u>.</u>			1,708,914.00				u					20,041,330			894,500.00	6,698,400.00	920,420.00	490,240.00	742.360.00	900,27000		901,260.00	906,570.00	532,740.00	754,600.00	325,180.00	00.065.058 c	932,850.00	00.000,100,1	1st Quarter	17,510,310	1,030,018		1,628,700.00	1,220,410.00	1,711,650.00	317,310.00	552,870.00	855.760.00	00 000 1400	304 280 00	660.000.00
0 1,851,631.00	0 2,959,896.00) 253,683.00) 1 251,874.00			ھي					ű					10,700,600			608,600.00	630,470.00	691,540.00	438,050.00	699,030.00	00.056.086	P42 740.00	8/1,450.00 907 060 00	862,580.00	505,200.00	754,800.00	309,180.00	3 670 660 00	879,350.00	945,000.00	4th Quarter	10, 100,010	951,106		1,161,600.00	1,221,160.00	1,106,370.00	233,090.00	552,840.00	867.100.00	367 610 00	308.780.00	660,000.00
0 1,799,516.00			0 1,188,969.00	.		<u>_</u>						R 584 406 00					10 707 450		498,700.00	595,420.00	711,620.00	418,940.00	685,940.00	253,680,00	818.220.00	255 620 00	848,000.00	489,170.00	736,200.00	299,070.00	3.573.290.00	412 SEU DU	908,500.00	3rd Quarter	10,400,110	908,222		1,178,500.00	1,204,090.00	1,041,260.00	257,900.00	503,030.00	868,580.00	636.650.00	328,560.00	460,000.00
00.868(097'L 0			0 1,166,085.00	_		<u>_</u> _				4		30	00 062 486				7 726,883		58,600.00	595,420.00	679,920.00		т.,			258 630.00				308,510.00	3,588,520.00	118 800.00	885,900.00	2nd Quarter	10,121,010	45 107 810		1,135,900.00	1,204,090.00	1,049,080.00	273,670.00	510,010.00	868,930.00	623,300.00	265,630.00	400,000.00
norozeľna / 1 0			<u>_</u>	0 1,403.339.00		1		•				8		1,070,000000			12,571,190		569,100.00		685,350.00					256,030.00	664 510 00	502,800.00	755,500.00	295,490.00	3,613,150.00	122,880.00	00.001.017	1st Quarter		14 709 530		1,133,300.00	1,147,870.00	1,182,210.00	269,120.00	512,980.00	889,640.00	623,260.00	273,020.00	462,000.00

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	Common charabolder's equity	Long-term debt	Current portion of long-term debt	Short-term debt	Ratios	1 0			Common shareholder's equity	I ong-term debt	Current portion of long-term debt	Short-term debt		501			Common characteric entity		Short-term debt	Hatios					Common shareholder's equity	Lona-term debt	Current portion of long-term debt	Short-term debt	Ratios	ATO		Common shareholder a cyuny		Current portion or long-term dear	Siloi rigilii agu	Hatios	Alg		Sum	Averane	
100%	39.71%	33.02%	3.89%	23.39%	1st Quarter	2006	9,069,300		51.00%	43.22%	0.15%	5.63%	1st Quarter	2006	312,360	100%	41.86%	53 02%	2.56%	101 Counter	tet Duarter	2006	4,156,340	100%	41.05%	52.48%	0.08%	6.39%	1st Quarter	2006	3,671,000	100%	43 1R%	39.72%	4.25%	12.86%	1et Ouerter	3006	35,234,446	2,202,153	2,967,700
		31.51%	3.70%	28.56%	4th Quarter	2005	9,068,500	100%	49.23%	43.24%	0.14%	7.39%	4th Quarter	2005	325,060	100%	38.28%	50.98%	2.46%	8.28%	4th Quarter	2005	4,299,760	100%	38.09%	50.74%	0.08%	11.10%	4th Quarter	2005	3,636,000	100%	41.23%	44.42%	0.00%	14.36%	4th Oriarter	2005	35,311,100	2,206,944	2,665,300 2,596,400
100%	42.69%	39.76%	4.67%	12.89%	3rd Quarter	2005	8,625,100	100%	50.87%	45.38%	0.02%	3.73%	3rd Quarter	2005	304,950	100%	38.89%	57.01%	0.00%	4.10%	3rd Quarter	2005	3,936,850	100%	40.70%	55.45%	0.08%	3.76%	3rd Quarter	2005	3,411,000	100%	42.54%	47.38%	0.00%	10.09%	ard Quarter	2005	34,841,420	2,177,589	1000
100%	45.08%	39.94%	4.71%	10.27%	2nd Quarter	2005	8,685,900	100%	51.62%	45.08%	0.02%	3.29%	2nd Quarter	2005	311,040	100%	40.23%	51.09%	1.61%	7.07%	2nd Quarter	2005	3,806,130	100%	42.46%	57.37%	0.09%	0.09%	2nd Quarter	2005	3,250,000	100%	44.83%	49.88%	0.00%	5.29%	2nd Quarter	2005	35,384,740	2,211,546	2,604,600
100%	45.05%	44.78%	0.01%	10.16%	1st Quarter	2005	8,605,400	100%	47.26%	45.49%	0.89%	6.36%	1st Quarter	2005	310,760	100%	41.31%	51.13%	1.61%	5.95%	1st Quarter	2005	3,898,870	100%	41.87%	57.83%	0.15%	0.15%	1st Quarter	2005	3,102,000	100%	46.62%	52.16%	0.00%	%	rter	2005	34,238,443	2,282,563	2,754,700
100%	39.78%	41.06%	0.02%	19.15%	4th Quarter	2004	9,368,490	100%	41.57%	47.17%	0.76%	10.50%	4th Quarter	2004	316,840	100%	38.80%	40.68%	3.16%	17.36%	4th Quarter	2004	3,834,840	100%	40.13%	58.81%	0.15%	0.90%			3,342,000	100%	41.44%	48.56%	0.00%	9.99%	4th Quarter	2004	32,574,376	1,916,140	2,650,700
100%	41.49%	44.33%	2.93%	11.25%	3rd Quarter	2004	8,771,750	100%	42.64%	50,43%	0.18%	6.74%	3rd Quarter	2004	308,910	100%	38.36%	41.73%	4.53%	15.38%	3rd Quarter	2004	2,006,590	100%	55.49%	42.92%	0.29%	0.29%	1		2,327,400	100%	43.95%	52.25%	0.15%	3.65%	3rd Quarter 2	2004	31,073,553	1,942,097	2,559,800
100%	48.99%	50.53%	0.00%	0.48%		2004	9,171,970	2007	42.70%	55.51%	0.18%	0.62%	2nd Quarter	2004	319,390	100%	38.34%	41.93%	9.71%	10.02%	2nd Quarter	2004	1,801,960	100%	D1.447	47.91%	0.33%	0.33%			2,202,000	100%	45.91%	43.69%	1.54%		2nd Quarter	2004	31,851,420	1,990,714	2,704,400
100%	38.35%	00.10%	23 420/	0.7%	DE EAN	2004	9,667,080	10076	39.65%	57.20%	0.02%	3.06%	1st Quarter	2004	320,970	100%	38.96%	41.73%	9.66%	9.66%	1st Quarter	2004	1,813,650	100%	01.4070	41.01%	0.40%	0.43%	1st Quarter		2,138,700	100%	46.85%	45.36%	1.57%	6.22%	1st Quarter	2004	31,/19,062	1,865,827	2,721,500
%00L	30.19%	06.10%	%EZ CE	0 00%	21 08%	2003 4th Quarter	9,939,380	100 20	100%	00.40%	0.0170	0.01%	4th Quarter	2003	312,050	100%	38.01%	44.52%	8.33%	9.13%	4th Quarter	2003	1,946,250	400%	101070	45 18%	0.07 /0	0.37%	402 01		2,361,000	100%	40.03%	40.49%	3.26%	16.22%			29,101,909	1,752,233	1,920,000
100%	40.00/	%05.95	37.06%	0.00%	26.55%	2003 3rd Quarter	9,054,550		100%	20 AB%	54 49%	0.13%	3rd Quarter	2003	303,290	100%	3/.11%	47.13%	7.25%	8.51%	STO QUALTEI	2003	1,857,310	100 /0	100%	46 17%	46 44%	0.50%	9689 1911		2,249,900	100%	40.38%	50.23%	1.87%	7.52%	1.		23,017,007	1,724,383	1,811,800
100/20	100%	41.58%	41.05%	0.00%	17.37%	2003 2nd Quarter	9,294,300		100%	38 61%	52 78%	1.20%	2nd Quarter 7 41%	2003	261,730	10076	40.00%	04.0 1%	0.00%	0.00%		2003	1,712,000	100 20	100%	48.33%	50.49%	0.57%	0.61%	2003	2,083,800	100%		441.09%	1.777/0	11.65%				1,608,263 97 340 465	2,721,500 1,920,000 1,811,800 1,889,300 1,870,500
	100%	40.62%	35.68%	3.44%	20.26%	2003 1st Quarter	9,291,900		100%	38.88%	51.01%	0.12%	%86'6	2003	287,810	10070	400%	40 60%	C.UU /0	0.00%	191 0000	2003	1,619,980		100%	43.69%	53.35%	0.57%	2.40%	2003 1st Ouarter	1,672,500	100.%	400%	40.70%	AE 70%	4 70%	1St Quarter	2003		26.896.837	1,870,500

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WGL			Common shareholder's equity	Long-term debt	Current portion of long-term debt	Short-term debt	Ratios					Common shareholder's equity	I ono-term debt	Current nortion of Iona-term debt	Short-form deht		PNY			Common shareholder's equity	Long-term debt	Current portion of long-term debt	Short-term debt	Ratios	PGL			Common shareholder's equity	Long-term debt	Current portion of long-term debt	Short-term debt				Common shareholder's equity	Long-term debt	Current portion of long-term debt	Short-term debt	Ratios and a statement of a structure and a structure of the structure of	GAS	
2006	881,800	100%	47.58%	38.04%	0.27%	14.11%	1st Quarter	2006	1,984,000	- 004 000	100%	47.33%	31 50%	1.76%	19 41%	1et Ouarter	2006	1,904,420	100%	44.32%	46.96%	0.00%	8.73%	1st Quarter	2006	1,226,810	100%	50.45%	40.88%	22R%	%05.9	2006	1,507,200	100%	55.63%	31.90%	3.32%	9.16%	1st Quarter	2006	1,033,510
2005	862,270	100%	45.37%	37.00%	0.27%	17.36%	4th Quarter	2005	1,737,090	1 707 600	100%	50.88%	35 97%	2.01%	11.14%	4th Ouarter	2005	1,874,580	100%	42.79%	47.76%	0.00%	9.46%	4th Quarter	2005	1,251,130	100%	46.91%	41.68%	0.64%	10.77%	2005 4th Ouarter	1,983,700	100%	40.90%	24.52%	2.52%	32.06%	4th Quarter	2005	1,083,500
2005	763,520	100%	48.23%	41.79%	0.31%	9.67%	3rd Quarter	2005	1,004,310	1 694 940	100%	53.75%	37.11%	2.08%	7.07%	Ard Oliarter	2005	1,703,880	100%	46.96%	52.56%	0.00%	0.48%	3rd Quarter	2005	1,180,500	100%	48.33%	50.32%	0.68%	0.68%	3rd Duarter	1,421,200	100%	54.95%	34.92%	0.00%	10.13%	3rd Quarter	2005	858,630
2005	745,000	100%	49.35%	42.84%	0.32%	7.50%	2nd Quarter	2005	006'060'1	1 500 080	100%	58.52%	41.48%	0.00%	0.00%	2nd Quarter	2005 .	1,792,030	100%	49.09%	50.06%	0.00%	0.85%	2nd Quarter	2005	1,167,820	100%	50.68%	44.66%	2.33%	2.33%	2005 2nd Ouarter	1,286,800	100%	61.38%	38.62%	0.00%	0.00%	2nd Quarter	2005	852,230
2005	726,470	100%	50.65%	44.24%	0.32%	4.78%	1st Quarter	2005	1,090,900	1 500 080	100%	58.52%	41.48%	0.00%	0.00%	1st Quarter	2005	1,773,450	100%	49.50%	50.50%	0.00%	0.00%	1st Quarter	2005	1,123,760	100%	53.34%	43.06%	1.33%	2.27%	1st Quarter	1,308,000	100%	59.36%	38.00%	0.00%	2.65%	1st Quarter	2005	849,430
2004	776,320	100%	44.36%	42.37%	0.69%	12.58%	4th Quarter	2004	1,700,000	1 750 680	100%	51.72%	37.51%	0.00%	10.77%	4th Quarter	2004	1,953,050	100%	45.25%	45.94%	0.00%	8.81%	4th Quarter	2004	1,185,050	100%	47.97%	40.84%	1.27%	9.92%	2004 4th Quarter	1,736,400	100%	43.14%	28.62%	0.01%	28.23%	4th Quarter	2004	926,460
2004	742,870	100%	45.35%	44.02%	0.71%	9.92%	3rd Quarter	2004	1,024,400	1 624 400	100%	52.63%	40.63%	0.00%	6.74%	3rd Quarter	2004	1,913,080	100%	45.48%	51.61%	0.00%	2.91%	3rd Quarter	2004	1,130,930	100%	48.48%	42.88%	0.00%	*	2004 3rd Quarter	1,614,400	100%	44.99%	30.83%	0.01%	24.17%	3rd Quarter	2004	857,940
2004	691,780	100%	48.94%	43.66%	0.76%	6.65%	200 Quarter	2004	1,070,000	1 570 000	100%	56.24%	42.04%	0.00%	1.72%	2nd Quarter	2004	1,886,880	100%	47.20%	50.15%	0.00%	2.65%	2nd Quarter	2004	1,067,970	100%	52.72%	46.82%	0.00%	0.46%	2004 2nd Quarter	1,380,300	100%	54,65%	35.98%	0.01%	9.36%	2nd Quarter	2004	752,690
2004	688,260	100%	47.85%	44.21%	0.77%	1.1/%	ISI QUAINA ISI	2004	1,000,200	1 565 260	100%	57.58%	42.17%	0.13%	0.13%	1st Quarter	2004	1,802,900	100%	50.28%	46.94%	0.00%	2.77%	1st Quarter	2004	1,055,770	100%	50.46%	47.37%	0.00%	2.17%	1st Quarter	1,438,300	100%	52.46%	34.53%	0.00%	13.00%	1st Quarter	2004	847,960
2003	730,080	100%	40.81%	42.29%	0.72%	16.17%	40 400	2003	L'000'0'0	2.090.510	100%	41.69%	31.57%	0.10%	26.65%	4th Quarter	2003	1,951,830	100%	44.19%	43.36%	0.00%	12.45%	4th Quarter	2003	1,091,720	100%	46.37%	45.83%	0.00%	7.80%	2003 4th Quarter	1,826,500	100%	41.31%	27.21%	0.00%	31.48%	4th Quarter	2003	854,400
2003	697,420	100%	36.65%	47.11%	1.21%	10.03%		2003	1,101,000	1.154.000	100%	55.89%	39.86%	0.17%	4.07%	3rd Quarter	2003	1,800,290	100%	47.10%	41.35%	0.00%	11.55%	3rd Quarter	2003	1,040,520	100%	47.01%	43.32%	0.74%	8.93%	3rd Quarter	1,824,600	%001	40.35%	21.83%	0.00%	37.82%	3rd Quarter	2003	821,890
2003	666,300	100%	38.82%	39.87%	1.20%	4 05%		2003	1100100	1.154.140	100%	55.90%	39.86%	0.17%	4.07%	2nd Quarter	2003	1,772,000	100%	49.42%	42.01%	0.00%	8.58%	2nd Quarter	2003	1,038,530	100%	48.25%	43.41%	3.37%	4.97%	2nd Quarter	1,489,600	%001	%06'0G	26.61%	0.00%				741,980
2003	636,050	100%	40.20%	42.92%	1.00%	4 600/	151 Cuarter	2003		1.220.510	100%	54.45%	37.85%	3.85%	3.85%	1st Quarter	2003	1,823,380	100%	47.28%	34.52%	4.94%	13.27%	1st Quarter	2003	1,028,730	100%	48.88%	47.24%	1.94%	1.94%	1st Quarter	1,541,800	100%	49.00%	25.70%	6.49%	18.81%	1st Quarter	2003	727,450

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Current portio	Short-term deht	Ratios	SWX			Common share	Long-term debt	Current portio	Short-term debt	Ratios	SUG			Common share	Long-term debt	Current portion	Short-term debt	Ratios	NJR			Common share	Long-term debt	Current portion	Short-term debt	Ratios	EGN			Common share	Long-term debt	Current portion	Short-term debt	Dating	APII			Common share	Long-term debt	Current portion	Short-term debt	Ratios
Current portion of long-term debt						Common shareholder's equity	¥.	Current portion of long-term debt	¥					Common shareholder's equity	æ	Current portion of long-term debt	¥					Common shareholder's equity	-	Current portion of long-term debt	*					Common shareholder's equity		Current nortion of long-term debt						Common shareholder's equity	-	Current portion of long-term debt	*	
3.62%	%c9 5	1st Quarter	2006	6,286,580	100%	27.17%	24.23%	9.15%	39.45%	1st Quarter	2006	1,047,290	100%	58.96%	31.94%	0.32%	8.78%	1st Quarter	2006	1,796,790	100%	57.24%	38.03%	0.83%	3.90%	1st Quarter	2006	1,299,250	100%	27.75%	71.77%	0.24%	0.24%	1et Ouarter	2006	008,188	100%	47.58%	38.04%	0.27%	14.11%	1st Quarter
3.67%	4.73%	4th Quarter	2005	4,346,510	100%	37.36%	47.14%	2.91%	12.58%	4th Quarter	2005	1,216,710	100%	43.24%	27.57%	0.29%	28.90%	4th Quarter	2005	1,758,920	100%	50.75%	38.84%	0.85%	9.55%	4th Quarter	2005	1,388,390	100%	23.26%	54.72%	11.01%	11.01%	4th Oliarter	2005	1,943,060	100%	47.44%	28.84%	3.86%	19.86%	4th Quarter
3.70%	5.02%	3rd Quarter	2005	4,308,830	100%	40.23%	47.56%	2.94%	9.28%	3rd Quarter	2005	935,850	100%	46.81%	33.89%	0.35%	18.95%	3rd Quarter	2005	1,443,720	100%	52.21%	45.71%	1.04%	1.04%	3rd Quarter	2005	1,369,010	100%	24.65%	58.10%	8.63%	8.63%	3rd Onarter	2005	1,619,260	100%	55.21%	36.08%	3.10%	5.62%	3rd Quarter
1.49%	1.49%	2nd Quarter	2005	4,034,200	100%	42.22%	53.97%	0.02%	3.79%	2nd Quarter	2005	1,036,450	100%	49.99%	30.69%	0.32%	19.00%	2nd Quarter	2005	1,564,530	100%	54.43%	44.29%	0.64%	0.64%	2nd Quarter	2005	1,321,890	100%	20.72%	60.19%	8.98%	10.11%	2nd Ollarter	2005	1,573,050	100%	58.64%	33.29%	3.19%	4.88%	2nd Quarter
1.93%	1.93%	1st Quarter	2005	4,139,770	100%	40.78%	52.60%	1.86%	4.76%	1st Quarter	2005	939,660	100%	55.02%	33.91%	0.36%	10.71%	1st Quarter	2005	1,502,690	100%	52.56%	46.11%	0.67%	0.67%	1st Quarter	2005	1,029,840	100%	34.88%	52.47%	5.74%	6.90%	1st Quarter	2005	1,733,330	100%	54.55%	30.21%	5.23%	10.01%	1st Quarter
1.40%	6.10%	4th Quarter	2004	3,588,760	100%	30.88%	57.81%	3.46%	7.85%	4th Quarter	2004	1,123,040	100%	45.14%	28.48%	0.28%	26.10%	4th Quarter	2004	1,571,560	100%	51.14%	39.00%	0.64%	9.23%	4th Quarter	2004	1,268,690	100%	21.84%	66.27%	4.76%	7.13%	4th Quarter	2004	1,737,150	100%	50.75%	33.03%	3.49%	12.73%	4th Quarter
1.53%	3.40%	3rd Quarter	2004	3,954,370	100%	29.75%	50.69%	6.59%	12.97%	3rd Quarter	2004	1,098,990	100%	42.58%	28.74%	2.52%	26.15%	3rd Quarter	2004	1,481,220	100%	49.64%	34.62%	0.68%	15.06%	3rd Quarter	2004	1,250,460	100%	23.11%	67.28%	4.80%	4.80%	3rd Quarter	2004	1,679,490	100%	51.41%	35.14%	3.61%	9.84%	3rd Quarter
0.36%	3.11%	2nd Quarter	2004	4,016,510	100%	22.87%	50.83%	9.12%	17.18%	2nd Quarter	2004	945,990	100%	50.89%	33,49%	2.92%	12.69%	2nd Quarter	2004	1,296,510	100%	58.13%	40.33%	0.77%	0.77%	2nd Quarter	2004	1,311,350	100%	26.71%	64.22%	4.54%	4.54%	2nd Quarter	2004	1,660,670	100%	53.47%	35.49%	3.65%	7.39%	2nd Quarter
0.07%	0.37%	1st Quarter	2004	4,353,070	100%	21.14%	39.32%	16.88%	22.66%	1st Quarter	2004	878,930	100%	55.78%	36.10%	3.15%	4.97%	1st Quarter	2004	1,315,230	100%	56.44%	42.04%	0.76%	0.76%	1st Quarter	2004	1,332,450	100%	26.10%	65.05%	4.42%	4.42%	1st Quarter	2004	1,703,080	100%	53.21%	36.28%	1.89%	8.62%	1st Quarter
0.34%	3.05%	4th Quarter	2003	2,159,410	100%	32.02%	51.23%	3.51%	13.23%	4th Quarter	2003	1,025,700	100%	42.71%	22.72%	2.70%	31.86%	4th Quarter	2003	1,282,870	100%	54.49%	43.09%	0.78%	1.64%	4th Quarter	2003	1,267,230	100%	22.27%	68.42%	4.65%	4.65%	4th Quarter	2003	1,420,960	100%	59.31%	25.87%	0.86%	13.97%	4th Quarter
0.39%	0.39%	3rd Quarter	2003	2,177,260	100%	32.68%	47.82%	3.09%	16.41%	3rd Quarter	2003	867,540	100%	48.29%	29.73%	0.28%	21.70%	3rd Quarter	2003	1,267,970	100%	54.10%	39.67%	1.58%	4.65%	3rd Quarter	2003	1,239,680	100%	20.46%	70.06%	4.74%	4.74%	3rd Quarter	2003	1,645,890	100%	49.71%	38.68%	0.74%	10.87%	3rd Quarter
0.44%	0.04%	2nd Quarter	2003	2,156,340	100%	31.53%	48.65%	4.56%	15.26%	2nd Quarter	2003	818,130	100%	53.18%	33.45%	0.29%	13.08%	2nd Quarter	2003	1,242,090	100%	52.58%	41.30%	1.85%	4.27%	2nd Quarter	2003	1,307,040	100%	24.19%	66.48%	4.67%	4.67%	2nd Quarter	2003	1,569,020	100%	54.23%	39.73%	1.80%	4,25%	2nd Quarter
0.48%	0.48%	1st Quarter	2003	2,215,760	100%	30.93%	53.35%	4.88%	10.83%	1st Quarter	2003	767,170	100%	55.39%	35.08%	0.31%	9.21%	1st Quarter	2003	1,250,640	100%	50.11%	41.02%	1.84%	7.04%	1st Quarter	2003	1,304,650	100%	22.51%	68.19%	4.65%	4.65%	1st Quarter	2003	1,658,650	100%	52.34%	37.58%	1.70%	8.38%	1st Quarter

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		Common shareholder's equity	Long-term debt	Current portion of long-term debt	Short-term debt	Ratios	UGI			Common shareholder's equity	Long-term debt
2,996,600	100%	37.08%	54.62%	1.90%	6.40%	1st Quarter	2006	2,293,660	100%	34.82%	57.95%
3,475,500	100%	29.14%	41.85%	12.17%	16.84%	4th Quarter	2005	2,266,460	100%	33.14%	58.46%
2,991,500	100%	33.35%	46.55%	8.42%	11.68%	3rd Quarter	2005	2,191,660	100%	34.28%	57.00%
2,936,300	100%	33.35%	49.67%	7.11%	9.87%	2nd Quarter	2005	2,091,310	100%	36.13%	60.88%
2,962,100	100%	34.44%	51.33%	5.81%	8.42%	1st Quarter	2005	2,084,860	100%	35.60%	60.54%
2,964,900	100%	31.00%	52.68%	5.93%	10.39%	4th Quarter	2004	2,128,260	100%	33.16%	59.34%
2,725,100	100%	30.61%	56.78%	4.51%	8.11%	3rd Quarter	2004	2,026,120	100%	32.66%	62.42%
2,781,200	100%	33.28%	56.59%	4.19%	5.94%	2nd Quarter	2004	1,960,860	100%	34.02%	62.51%
2,777,100	100%	32.21%	58.65%	3.45%	5.69%	1st Quarter	2004	7,954,350	100%	84.21%	15.34%
2,247,100	100%	27.08%	51.69%	2.91%	18.32%	4th Quarter	2003	1,916,500	100%	32.90%	63.72%
1,863,800	100%	26.76%	63.23%	3.49%	6.52%	3rd Quarter	2003	1,813,650	100%	32.83%	66.39%
1,458,600	100%	4.02%	77.88%	8.54%	9.56%	4th Quarter 3rd Quarter 2nd Quarter	2003	1,808,310	100%	32.93%	66.59%
1,987,600	100%	28.63%	57.02%	6.23%	8.12%	1st Quarter	2003	1,778,080	100%	34.47%	64.56%