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COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

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

**RESPONSE OF ATMOS ENERGY CORPORATION
TO ATTORNEY GENERAL'S OBJECTION TO
PETITION FOR CONFIDENTIALITY
AND AMENDED CONFIDENTIALITY PETITION**

Atmos Energy Corporation ("Atmos Energy" or "Company"), by counsel, responds as follows to the Objection filed by the Attorney General to the Company's Petition for Confidentiality and amends the previously filed petition as set forth below.

On July 1, 2019, the Company filed a Petition for Confidentiality ("Petition") relating to certain of the information contained in some of its responses to Staff's First Data Requests. On July 18, 2019, the Attorney General filed an objection to the Company's Petition.

Before addressing the merits of the Attorney General's Objection, it should be noted that under 807 KAR 5:001, Section 13, 3(d), any response to a motion for confidential treatment must be filed within seven (7) days after the motion was filed with the Commission. The Attorney General's Objection was accordingly not timely filed. In light of its response below, the Company waives its right to object to the late filing, as the Attorney General has raised certain valid objections.

The Attorney General's Objection relates to four of the Staff's First Data Requests:

1. Response to Commission Staff 1-01.

The Attorney General correctly points out that the Company's Confidentiality Petition states that the cost analysis was being submitted in response to Staff DR 1-01. Reference to Staff DR 1-01 was a typographical error. The Petition should have stated that the cost analysis was being submitted as an attachment to Staff DR 1-07. The cost analysis, was in fact, attached to Staff DR 1-07. The Company's

previously filed Petition is hereby amended to change the reference to Staff DR 1-01 to Staff DR 1-07 when referring to the cost analysis.

2. Response to Commission Staff 1-06.

Staff DR 1-06(b) requested the Company to provide a hypothetical bill illustrating the application of the EDR discount. In response, Atmos submitted the most recent actual invoice to the customer, Diageo Americas Supply, Inc. ("Diageo") which contained electronic bank account information of Diageo. The Company subsequently filed a redacted copy of the bank account information on July 10, 2019. The Attorney General correctly points out that the Petition for Confidentiality did not specifically refer to the redaction of private electronic banking information of the customer. Under 807 KAR 5:001, Section 4(10), bank account information is required to be redacted. The Company accordingly did not believe it was necessary to include in its Petition redaction related to relevant financial accounts. The Company believes that no further action is required to satisfy the Attorney General's concerns.

3. Response to Commission Staff 1-07.

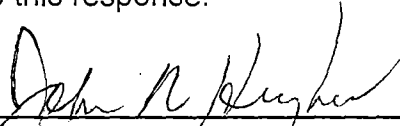
This objection from the Attorney General resulted from the same erroneous reference to Staff DR 1-01 discussed in Item 1 above. The Company had erroneously referred to the cost analysis being attached to Staff DR 1-01 when it should have stated Staff DR 1-07. The Company's previously filed Confidentiality Petition is hereby amended to change the reference from Staff DR 1-01 to Staff DR 1-07 when referring to the cost analysis. The Company continues to maintain that the redacted information in the cost analysis itself is entitled to confidential protection for the reasons set forth in the Company's originally filed Confidentiality Petition.

4. Response to Staff DR 1-09.

The Company requested, out of an abundance of caution, that its correspondence with its customer be treated as confidential. In light of the Attorney General's objection and upon further review of the correspondence, the Company will not oppose the Attorney General as to the customer correspondence. The previously filed Petition is hereby amended to withdraw the request that the correspondence provided in response to Staff DR 1-09 be treated as confidential and the correspondence included with the confidentiality petition should be filed into the public record.

SUMMARY

The Company acknowledges the Attorney General's discovery of the Company's clerical error in referring to the wrong Data Request number in its Petition and amends its petition for confidentiality to conform to this response.



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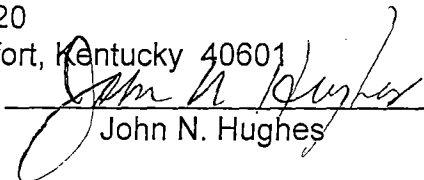
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CERTIFICATE OF SERVICE

Counsel certifies that an original and ten (10) copies were served and filed with the Kentucky Public Service Commission, 211 Sower Blvd., Frankfort, Kentucky 40601 and true and accurate copies were served upon the following, on this the 25 day of July, 2019:

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