

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ATMOS	)	
ENERGY CORPORATION FOR CERTIFICATES	)	CASE NO.
OF PUBLIC CONVENIENCE AND NECESSITY	)	2026-00202
FOR PROJECTS TO BE INCLUDED IN THE	)	
PIPELINE MODERNIZATION RIDER	)	

COMMISSION STAFF'S FIRST 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 on October 2, 2026. 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Atmos shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, page 3, paragraph 5. Refer also to Attachment RC-1. Refer further to Direct Testimony of Ryan A. Chastain (Chastain Direct Testimony), page 9, lines 16-21.

- a. Provide a detailed cost breakdown for each project that compares the cost of pressure-testing of the lines versus the costs of line replacement, separately

in Excel spreadsheet format, including all calculations, with all formulas, columns, and unprotected rows and fully accessible. Provide any supporting workpapers.

b. Explain the difference between the length of the pipelines in paragraph 5 and the Attachment RC-1.

c. Provide the length, diameter/size, and material of each project's pipeline in a table comparing the existing pipeline with the replacement pipeline for the 5,600-foot and 2,300-foot project segments.

2. Refer to Chastain Direct Testimony, page 8, line 11-13. Provide the actual historical operating and maintenance (O&M) cost data for comparable segments in Atmos's system that form the basis of this estimate in Excel spreadsheet format, including all calculations, with all formulas, columns, and unprotected rows and fully accessible.

3. Refer to the Application, pages 3 and 8, and Case No. 2024-00276, Atmos's response to Commission Staff's First Post-Hearing Request for Information (Staff's Response to First Post-Hearing Request), Item 2, including Exhibit TRA-5.²

a. For the Hawesville Domtar Line (Domtar) project:

(1) Confirm whether this is the pipeline with an in-service date of 12/5/1964 listed on Exhibit TRA-5.

(2) State what portion of the \$6,124,697 listed as Estimated Capital Cost in Exhibit TRA-5 for the three projects including Domtar was attributable to Domtar.

² Case No. 2024-00276, *Electronic Application of Atmos Energy Corporation for an Adjustment of Rates; Approval of Tariff Revisions; and Other General Relief* (filed May 28, 2025), Atmos's Response to Commission Staff's First Post-Hearing Request for Information.

(3) Confirm that the Estimated Capital Cost in Exhibit TRA-5 attributable to Domtar has not changed. If unable to confirm, provide an updated estimated capital cost for Domtar and explain the difference.

(4) Explain the difference in pipeline length between the Application and Exhibit TRA-5.

(5) Explain whether pressure testing to comply with the PHMSA Mega Rule is feasible from a technological, logistical, and safety perspective, including a discussion that addresses the issues raised in Atmos's Response to Staff's First Post-Hearing Request, Item 2(b).

(6) Explain whether retrofitting existing pipeline for ILI tool capability to comply with the PHMSA Mega Rule is feasible from a technological, logistical, and safety perspective, including a discussion that addresses the issues raised in Atmos's Response to Staff's First Post-Hearing Request, Item 2(b).

b. For the Bon Harbor Field Lines (Bon Harbor) project:

(1) Confirm whether this is the pipeline with an in-service date of 8/1/1964 listed on Exhibit TRA-5.

(2) Explain the difference in pipeline length between the Application and Exhibit TRA-5.

(3) Explain the difference in estimated cost _ between the Application and Exhibit TRA-5.

(4) Explain whether pressure testing to comply with the PHMSA Mega Rule is feasible from a technological, logistical, and safety perspective, including a

discussion that addresses the issues raised in Atmos's response to Staff's First Post-Hearing Request, Item 2(b).

(5) Explain whether retrofitting existing pipeline for ILI tool capability to comply with the PHMSA Mega Rule is feasible from a technological, logistical, and safety perspective, including a discussion that addresses the issues raised in Atmos's response to Staff's First Post-Hearing Request, Item 2(b).

c. For both projects:

(1) Provide the estimated useful life of the replacement pipeline.

(2) Provide the estimated cost of pressure testing (if feasible) and retrofitting for ILI capability (if feasible) over the expected useful life of the proposed projects.

4. Describe all benefits to replacing the Domtar and Bon Harbor lines other than PHMSA Mega Rule compliance.

5. Explain how Atmos determined what size pipe to use for each of the proposed projects.


Justin McNeil
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601-8294

DATED SEP 15 2026

cc: Parties of Record

Service List for Case 2026-00202

* L. Allyson Honaker
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

* Heather Temple
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

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

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

* Meredith L. Cave
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

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