COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S THIRD 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 December 14, 2026. The Commission directs Atmos to the Commission's July 22, 2021 Order in Case No. 2020-00085[1] 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 Atmos's response to Commission Staff's First Request for Information (Staff's First Request), Item1(a); Atmos's response to Commission Staff's Second Request for Information (Staff's Second Request), Item2(a); and Atmos's Application, Direct Testimony of Ryan A. Chastain (Chastain Direct Testimony), page 6, line 19, through page 7, line 2, regarding the Hawesville Domtar Line, in which testimony indicated:

> [p]ressure testing on this section of pipeline is not possible because this pipe serves one of the largest industrial customers Atmos Energy serves in the state that constantly consumes natural gas for their process. To pressure test this line, Atmos Energy would have to take the pipeline out of service. Additionally, a pressure test requires doubling the pressure on the line. Doing so could lead to additional operational concerns of the pipe. Furthermore, Atmos Energy would have to excavate and perform tests to verify the material properties in conjunction with a pressure test.

a. State whether taking the pipeline out of service is possible. If so, identify steps required to mitigate the outage, including, but not limited to, use of liquid natural gas (LNG) and provide estimated costs.[2]

b. If taking the pipeline out of service is not possible, explain why not.

c. Explain what was meant by "additional operational concerns of the pipe."

d. State whether doubling the pressure on the line is possible. If so, identify risks or costs involved.

e. If doubling the pressure on the line is not possible, explain why not.

f. State whether excavating and performing tests to verify material properties is possible. Provide estimated costs for this work.

g. If excavating and performing tests to verify material properties is not possible, explain why not.

[2] For the purposes of these data requests, Commission Staff is not requesting that Atmos "develop segment-specific testing plans" as noted in Atmos's Response to Staff's First Request (filed Oct. 2, 2026), Item 1(a). Commission Staff seeks the same level of cost accuracy that Atmos used to determine that under some circumstances, pressure testing was a feasible option, as noted in Chastain Direct Testimony at 5, lines 6-7; Atmos's Response to Staff's First Request, Item 3, Attachment RC-1; and Atmos's Response to Staff's Second Request (filed Oct. 30, 2026), Item 2(a).

h. Identify any other estimated costs associated with pressure testing, including but not limited to, repair of faulty pipeline.

2. Refer to Chastain Direct Testimony, page 10, lines 6-10, regarding the Bon Harbor Field Line, in which testimony indicated:

> [p]ressure testing this pipeline is not an option because the storage field would be taken out of service and the Company would lose ability to inject or withdrawal from the storage field. This would have a negative impact on the system and the customers it serves. Additionally, with a pressure test, material properties would have to be determined and verified as well.

a. Explain the effects of the storage field being taken out of service, including, but not limited to, effects beyond outages for customers taking service using the Bon Harbor Field Line.

b. State whether taking the pipeline out of service is possible. If so, identify steps required to mitigate the outage, including, but not limited to, use of liquid natural gas (LNG) and provide estimated costs.

c. If taking the pipeline out of service is not possible, explain why not.

d. Explain what was meant by "additional operational concerns of the pipe."

e. State whether doubling the pressure on the line is possible. If so, identify risks or costs involved;

f. If doubling the pressure on the line is not possible, explain why not.

g. State whether excavating and performing tests to verify material properties is possible. Provide estimated costs for this work.

h. If excavating and performing tests to verify material properties is not possible, explain why not.

3. Refer to Atmos's response to Staff's First Request, Item 3(a)(6), regarding Hawesville Domtar Line retrofitting, stating:

> [t]o ensure piggability, large sections of the pipeline would have to be exposed to check for and remove existing tap tees and potential bends or elbows of insufficient radius. Excavating the pipeline to identify and replace sections to remove "non-piggable" fittings introduces additional safety concerns. To install pig launchers and receivers and to remove fittings and appurtenances that are not designed for piggability, the pipeline would have to be removed from service, impacting downstream customers.

a. Identify the safety concerns with retrofitting and compare the risks to the risks of replacing pipeline to a live line.

b. Identify any facts that make ILI retrofitting impossible as opposed to being prohibitively expensive.

c. Evaluate the use of robotic inspection, tethered or remote-control pigs, and bypassing for inspection of non-piggable pipeline sections. State whether bypass installations can be reused for future testing.

d. Provide estimated costs for the steps described regarding Hawesville Domtar Line retrofitting, as well as any other costs.

4. Refer to Atmos's response to Staff's First Request, Item 3(b)(5), regarding the Bon Harbor Field Line.

a. Identify any facts that make ILI retrofitting impossible as opposed to being prohibitively expensive.

b. Provide estimated costs for the steps described regarding retrofitting, as well as any other costs.

5. Refer to Atmos's response to Staff's Second Request, Item 2(a).

a. Describe the policies or processes used to determine which projects are more closely examined to determine whether they are candidates for pressure reduction or pressure testing as opposed to replacement.

b. Identify cost estimate specificity levels used at the "preliminary evaluation" stage and any other stage used to evaluate these options.

c. Identify what value of cost savings or other metrics must be satisfied to trigger closer examination of pressure reduction or pressure testing.

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DATED NOV 17 2026

cc: Parties of Record

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