## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

## THE APPLICATION OF ATMOS ENERGY)CORPORATION FOR AN ADJUSTMENT OF)RATES AND TARIFF MODIFICATIONS)

CASE NO. 2013-00148

## ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Requests for Information to Atmos Energy Corporation [hereinafter referred to as "Atmos" or "the company"] to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for Columbia with an electronic version of these questions, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information

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within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and

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shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computerreadable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) The Attorney General reserves the right to pose additional supplemental data requests on or before the due date specified in the Commission's procedural schedule.

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Respectfully submitted,

JACK CONWAY ATTORNEY GENERAL

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## Notice of Filing, Certifications, and Notice of Service

Undersigned counsel provides the following notice with regard to the filing of this Motion for Extension of Time, certifications for the filing, and notice of the service of information to the other parties of record. Pursuant to the Commission's 28 June 2013 Order of procedure, the material was filed through uploading an electronic version of each document via the Commission's E - Filing System.

Furthermore, the original and two (2) paper copies of the material will be filed at the Commission's office on the next business day following the electronic filing.

Consistent with Numbered Paragraph 4 of the Commission's 28 June 2013 Order of procedure, undersigned certifies that the electronic version of the filing is a true and accurate version of each document filed in paper medium; that the electronic version has been transmitted to the Commission; and a copy of the filing in paper medium has been mailed to all parties that the Commission has excused from participation by electronic means.

The Attorney General has provided notice to the Commission and other parties, by electronic mail, of this filing.

Honorable John N Hughes Attorney at Law 124 West Todd Street Frankfort, KY 40601

Mark R Hutchinson Wilson, Hutchinson & Poteat 611 Frederica Street Owensboro, KY 42301 Eric Wilen Project Manager-Rates & Regulatory Affairs Atmos Energy Corporation 5420 LBJ Freeway, Suite 1629 Dallas, TX 75420

Honorable John M Dosker General Counsel Stand Energy Corporation 1077 Celestial Street Building 3, Ste 110 Cincinnati, OH 45202-1629

The electronic filing took place on 11 September 2013 with the filing of the documents in paper medium scheduled for 12 September 2013.

/s/ Jennifer Black Hans Assistant Attorney General