

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF ATMOS CORPORATION FOR) CASE NO.
FOR A GENERAL RATE ADJUSTMENT) 2015-00343

ATTORNEY GENERAL'S RESPONSES TO DISCOVERY REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and files the following responses to data requests in the above-styled matter.

Respectfully submitted,
ANDY BESHEAR
ATTORNEY GENERAL



KENT CHANDLER
REBECCA GOODMAN
LAWRENCE W. COOK
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE
SUITE 200
FRANKFORT, KY 40601-8204
(502) 696-5456
FAX: (502) 573-1009
Kent.Chandler@ky.gov
Larry.Cook@ky.gov
Rebecca.Goodman@ky.gov

WITNESS/RESPONDENT RESPONSIBLE

Lane Kollen

REQUEST No.1

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To Lane Kollen:

Provide your testimony from the five most recent cases involving regulated gas utility companies and the final orders in those cases.

RESPONSE:

Please reference the links for the testimonies and orders listed below.

04/08, Docket No. 26837, Direct, Rebuttal, and Supplemental Rebuttal, SCANA Energy Marketing, Inc.

Direct Testimony

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=111343>

Rebuttal Testimony

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=111962>

Supplement Rebuttal Testimony

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=112165>

Order

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=128487>

07/08, Docket No. 27163, Direct and Panel Direct, Atmos Energy Group

Direct Testimony and Panel Direct Testimony

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=113484>

Order

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=115739>

08/09, Docket No. 29950, Direct, Atlanta Gas Light Company

Direct Testimony

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=122554>

Order

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=160430>

08/10, Docket No. 31647, Direct and Panel Direct, Atlanta Gas Light Company

Direct Testimony and Panel Testimony

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=130625>

Order

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=132939>

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04/16, Docket No. 39971, Panel Direct, Southern Company, AGL Resources, Georgia
Power Company, Atlanta Gas Light Company
Panel Direct Testimony
<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=162909>
Order
Not yet issued.

WITNESS/RESPONDENT RESPONSIBLE

Lane Kollen

REQUEST No.2

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To Lane Kollen:

Provide your testimony from the five most recent cases involving regulated electric utility companies and the final orders in those cases.

RESPONSE:

Please reference the links or PDF files for the testimonies and orders listed below.

05/15, 07/15, Docket No. E10-65, Direct, Direct and Answering, Entergy Services, Inc.

Direct Testimony

See PDF file.

Direct and Answering Testimony

See PDF file.

Order

Not yet issued.

09/15, Case No. 14-1693-EL-RDR, Direct, Ohio Energy Group

Direct Testimony

<http://dis.puc.state.oh.us/TiffToPDF/A1001001A15I11B55341J02332.pdf>

Order

<http://dis.puc.state.oh.us/TiffToPDF/A1001001A16C31B40932C01840.pdf>

12/15, Docket No. 45188, Direct, Oncor Electric Delivery Company

Direct Testimony

http://interchange.puc.texas.gov/WebApp/Interchange/application/dbapps/filings/pgSearch_Results.asp?TXT_CNTR_NO=45188&TXT_ITEM_NO=398

Order

http://interchange.puc.texas.gov/WebApp/Interchange/application/dbapps/filings/pgSearch_Results.asp?TXT_CNTR_NO=45188&TXT_ITEM_NO=671

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12/15, 01/16, Docket No. 6680-CE-176, Direct, Surrebuttal, Supplemental Rebuttal,
Wisconsin Power and Light Company

Direct

See PDF file.

Surrebuttal

See PDF file.

Order

Not yet issued.

03/16, Docket No. 15-1673-E-T, Direct, Appalachia Power Company

Direct Testimony

<http://www.psc.state.wv.us/scripts/WebDocket/ViewDocument.cfm?CaseActivityID=447115&NotType=%27WebDocket%27>

Order

Not yet issued.

ATTACHMENTS:

ATTACHMENT 1 – Kollen_Direct_EL10-65.pdf

ATTACHMENT 2 – Kollen_Direct_and_Answering_EL10-65.pdf

ATTACHMENT 3 – Kollen_Direct_6680-CE-176.pdf

ATTACHMENT 4 – Kollen_Supplemental_Rebuttal_6680-CE-176.pdf

WITNESS/RESPONDENT RESPONSIBLE

Lane Kollen

REQUEST No.3

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To Lane Kollen:

Provide your testimony from the five most recent cases involving the issue of NOLC for regulated utility companies and the final orders in those cases.

RESPONSE:

Please reference the links or PDF files for the testimonies and orders listed below.

11/95, Docket No. U-21485, Supplemental Direct, Surrebuttal, Gulf States Utilities Co.
Supplemental Direct Testimony

<http://lpscstar.louisiana.gov/star/ViewFile.aspx?Id=41030bce-ad77-4dc0-a0fe-7412ee586a68>

Surrebuttal Testimony

<http://lpscstar.louisiana.gov/star/ViewFile.aspx?Id=11248bb3-4ba7-4d86-b7f2-4b4aeb7478c5>

Order

<http://lpscstar.louisiana.gov/star/ViewFile.aspx?Id=3cb503bb-da9c-43ae-96e5-fbc0373f2b04>

09/96, 11/96, Docket No. U-22092, Direct and Surrebuttal, Entergy Gulf States, Inc.
Direct Testimony

See PDF file.

Surrebuttal Testimony

<http://lpscstar.louisiana.gov/star/ViewFile.aspx?Id=c4fcc168-bf75-4acd-ab21-c1874c7885c6>

Order

<http://lpscstar.louisiana.gov/star/ViewFile.aspx?Id=7bdc2d25-54f2-425d-804d-36d0a9d9972f>

02/08, Docket No. ER07-956-000, Direct, Cross Answering, Entergy Services, Inc. and the Entergy Operating Companies

Direct Testimony

See PDF file.

Cross Answering Testimony

See PDF file.

Orders – Opinions 505 and 505-A

See PDF files.

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06/12, Docket No. 40020, Direct, Lone Star Transmission, LLC

Direct Testimony

http://interchange.puc.texas.gov/WebApp/Interchange/application/dbapps/filings/pgSearch_Results.asp?TXT_CNTR_NO=40020&TXT_ITEM_NO=533

Order

http://interchange.puc.texas.gov/WebApp/Interchange/application/dbapps/filings/pgSearch_Results.asp?TXT_CNTR_NO=40020&TXT_ITEM_NO=762

10/12, Docket No. 40604, Direct, Cross Texas Transmission, LLC

Direct Testimony

http://interchange.puc.texas.gov/WebApp/Interchange/application/dbapps/filings/pgSearch_Results.asp?TXT_CNTR_NO=40604&TXT_ITEM_NO=137

Order

http://interchange.puc.texas.gov/WebApp/Interchange/application/dbapps/filings/pgSearch_Results.asp?TXT_CNTR_NO=40604&TXT_ITEM_NO=223

03/16, Docket No. EL01-88-015, Direct, Answering, Entergy Services, Inc.

Direct Testimony

See PDF file.

Answering Testimony

See PDF file.

Order

Not yet issued.

ATTACHMENTS:

ATTACHMENT 1 – Kollen_Direct_U-22092.pdf

ATTACHMENT 2 – Kollen_Direct_ER07-956-000.pdf

ATTACHMENT 3 – Kollen_Cross_Answering_ER07-956-000.pdf

ATTACHMENT 4 – Opinion_505_ER07-956-001.pdf

ATTACHMENT 5 – Opinion_505-A_ER07-956-002.pdf

ATTACHMENT 6 – Kollen_Direct_EL01-88-015.pdf

ATTACHMENT 7 – Kollen_Answering_EL01-88-015.pdf

WITNESS/RESPONDENT RESPONSIBLE

Lane Kollen

REQUEST No.4

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To Lane Kollen:

Provide your testimony from the five most recent cases involving the issue of lead-lag studies for regulated utility companies and the final orders in those cases.

RESPONSE:

Please reference the links or PDF files for the testimonies and orders listed below.

11/01, 03/02, Docket No. 14311, Direct Panel, Rebuttal Panel, Atlanta Gas Light Company

Direct Panel Testimony

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=51567>

Rebuttal Panel Testimony

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=54266>

Order

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=54940>

02/05, Docket No. 18638, Direct, Atlanta Gas Light Company

Direct Testimony

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=80412>

Order

<http://www.psc.state.ga.us/factsv2/Document.aspx?documentNumber=82042>

11/08, Docket No. 35717, Direct, Oncor Delivery Company

Direct Testimony

http://interchange.puc.texas.gov/WebApp/Interchange/application/dbapps/filings/pgSearch_Results.asp?TXT_CNTR_NO=35717&TXT_ITEM_NO=541

Order

http://interchange.puc.texas.gov/WebApp/Interchange/application/dbapps/filings/pgSearch_Results.asp?TXT_CNTR_NO=35717&TXT_ITEM_NO=954

07/12, Docket No. 120015-EI, Direct, Florida Power & Light Company

Direct Testimony

<http://www.psc.state.fl.us/library/filings/12/04393-12/04393-12.pdf>

Order

<http://www.psc.state.fl.us/library/filings/13/00264-13/00264-13.pdf>

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01/01, Case No. 2000-386, Direct, Louisville Gas & Electric Company
Direct Testimony
See PDF file.
Order
http://psc.ky.gov/order_vault/Orders_2001/200000386_041801.pdf

ATTACHMENTS:

ATTACHMENT 1 – Kollen_Direct_2000-386.pdf

ATTACHMENT 2 – Order_Case_No._2000-386.pdf

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WITNESS/RESPONDENT RESPONSIBLE

Lane Kollen

REQUEST No.5

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To Lane Kollen:

Provide any public comments prepared by or submitted by you to the Internal Revenue Service or Treasury Department related to the issue of NOLC or tax normalization.

RESPONSE:

Please see attachments

ATTACHMENTS:

ATTACHMENT 1 – Transcript.pdf

ATTACHMENT 2 – IRS_EDIT_and_ITC.pdf

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WITNESS/RESPONDENT RESPONSIBLE

Lane Kollen

REQUEST No.6

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To Lane Kollen:

Please provide all workpapers in excel (native) format with formulas and links intact and sources cited

RESPONSE:

Please see attachments

ATTACHMENTS:

ATTACHMENT 1 – AG Recomm Comp Alloc Factors - Staff_2-21_Att1_-_Fall_2015_KY_Rev_Req_Model_-_Final_Copy_-_External_Links_to_1-59_WPs.xlsx

ATTACHMENT 2 – AG_1-04_Att5_-_Total_Operating_Expenses-As Summed and Calculated by AG.xlsx

ATTACHMENT 3 – As Filed - Staff_2-21_Att1_-_Fall_2015_KY_Rev_Req_Model_-_Final_Copy_-_External_Links_to_1-59_WPs.xlsx

ATTACHMENT 4 – Atmos Rev Req - AG Recommendation.xlsx

ATTACHMENT 5 – Copy of Staff_1-59_Att26 - KY Plant Data-Fall 2015 case - After Change in Cap Addition Rate.xlsx

ATTACHMENT 6 – New Calc Page out of Model.xlsx