

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
ATMOS ENERGY CORPORATION)	CASE NO.
FOR PRP RIDER RATES)	2017-00308

ATTORNEY GENERAL’S MOTION FOR LEAVE TO FILE DATA REQUESTS

Comes now, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and moves the Kentucky Public Service Commission (“Commission”) for leave to file data requests. In support of his Motion, the Attorney General states as follows:

On July 28, 2017 Atmos Energy Corporation (“Atmos”) filed with the Commission its application to establish PRP Rider Rates for the twelve month period commencing October 1, 2017 (“Application”). The tariffs tendered with the Application were issued as of August 1, 2017, with an effective date of October 1, 2017. Pursuant to its August 22, 2017 Order, the Commission both suspended the proposed tariffs up to and including March 1, 2018, and propounded discovery upon Atmos via a single data request. Atmos filed its response to the data request on August 24, 2017, the same day on which the Attorney General moved for intervention.

The Attorney General has discussed this matter with representatives of Atmos, who have stated they have no objection to the Attorney General filing one round of data requests. The Attorney General also understands that Atmos wishes to obtain approval of the PRP rates as close to the proposed effective date of October 1, 2017 as

possible. Additionally, the Attorney General is cognizant of the fact that the Commission itself has noted that it intends to “use its best effort to expedite the review of the revised PRP rates.”¹ The Attorney General’s tendered requests are limited in scope and he is flexible in regards to a due date for Atmos’ responses. Moreover, the Attorney General believes that as Atmos wishes to obtain approval as soon as possible, the company is motivated to file responses as soon as possible, even without a specified due date. By merely requesting leave to conduct a single round of discovery, without requesting the creation or alteration of a procedural schedule, the Attorney General wishes to avoid any burden or inconvenience to the Commission or Atmos. Most importantly, the Attorney General believes that these data requests and the responses thereto may prove useful to the Commission in determining the reasonableness of the proposed tariffs and the ongoing pipeline replacement program itself.

WHEREFORE, the Attorney General moves the Commission for leave to file a single round of data requests tendered herein, to be answered upon Atmos’ ability to do so.

¹ Order. Case No. 2017-00308, p. 1 (Ky. PSC August 24, 2017).

Respectfully submitted,

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ATTORNEY GENERAL



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