

JOHN N. HUGHES
Attorney at Law
Professional Service Corporation
124 West Todd Street
Frankfort, Kentucky 40601

Telephone: (502) 227-7270

jnhughes@johnnhughespsc.com

April 22, 2019

Gwen Pinson
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: Atmos Energy Corporation:
Case No. 2018-00281

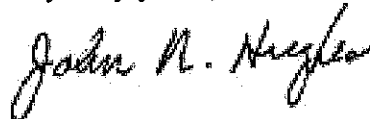
Dear Ms. Pinson:

Atmos Energy Corporation submits its supplemental response to the Commission's Post Hearing Data Requests PHDR -1. Included with the filing is a petition for confidentiality for PHDR 1-12.

I certify that the electronic filing is a complete and accurate copy of the original documents to be filed in this matter, which will be filed within two days of this submission and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

If you have any questions about this matter, please contact me.

Very truly yours,



John N. Hughes

And

Mark R. Hutchinson
Wilson, Hutchinson and Littlepage
611 Frederica St.
Owensboro, KY 42301
270 926 5011
randy@whplawfirm.com

Attorneys for Atmos Energy
Corporation

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

Application of Atmos Energy Corporation)
for an Adjustment of Rates) Case No. 2018-00281
and Tariff Modifications)

PETITION FOR CONFIDENTIALITY
FOR RESPONSE TO DR 1-12
OF THE COMMISSION'S POST HEARING DATA REQUEST

Atmos Energy Corporation (Atmos Energy), by counsel, petitions for an order granting confidential protection of certain responses to the data request dated April 5, 2019, pursuant to 807 KAR 5:001, Section 13 and KRS 61.878.

The Commission's data request (PHDR) 1-12 requests information about risk assessment studies and risk rankings for pipeline replacement in the states Atmos operates. Atmos previously filed similar information for the KY DIM model on April 8, 2019. The additional information provided in this portion of the response to PHDR 1-12 contains sensitive commercial information in the that can be associated with specific projects and pipeline locations for all Atmos Energy's service areas. The information, including risk assessment policies and methods as well as risk priority rankings of various pipeline facilities across Atmos Energy's service areas, identifies threats to the Company's distribution systems and assigns a relative risk rating to facilities to help indicate elevated levels of risk and need for replacement. The disclosure of this information could allow competitors of Atmos Energy or others to

determine pipeline locations, risk factors, high risk locations of facilities and other vulnerabilities of Atmos Energy's pipeline facilities.

KRS 61.878(1)(m)(1) protects "[p]ublic records the disclosure of which would have a reasonable likelihood of threatening the public safety by exposing a vulnerability in preventing protecting against, mitigating, or responding to a terrorist act. . . ." The response provides information about the distribution system, which could be used to analyze vulnerable locations in all of Atmos Energy's distribution system, which is a public utility critical system, and which could therefore threaten public safety.

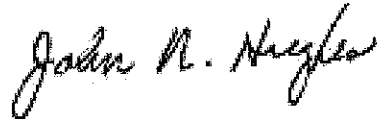
Public disclosure of the information would unnecessarily provide interested parties and Atmos Energy's competitors with access to exclusive information regarding physical plant information, plant locations, potential plant replacements and other sensitive information about the operational activities of the Company; which could unfairly harm Atmos Energy's competitive position in the marketplace as well as its security.

The information sought in the data request is commercial information that if disclosed could cause substantial harm to Atmos Energy and its customers. These portions of Atmos Energy's Response contain proprietary information that would aid competitors of Atmos Energy or others and such proprietary information is subject to protection from disclosure pursuant to Kentucky law. This information is not publicly available. It would be difficult or impossible for someone to discover this information from other sources. If this information were available to competitors in this form, they could use it to the competitive detriment of Atmos Energy. This information is not generally disclosed to non-management employees of Atmos Energy and is protected internally by the Company as proprietary information. The disclosure of this proprietary

information would result in significant or irreparable competitive harm to Atmos Energy by providing its competitors with non-reciprocal competitive advantage. No public purpose is served by the disclosure of such information. Atmos Energy requests that the information be held confidentially indefinitely. The statutes cited above do not allow for disclosure at any time.

For these reasons, Atmos Energy requests that the items identified in this petition be treated as confidential in their entirety. Should the Commission determine that some or all the material is not to be given confidential protection, Atmos Energy requests a hearing prior to any public release of the information to preserve its rights to notice of the grounds for the denial and to preserve its right of appeal of the decision.

Submitted by:



John N. Hughes
124 West Todd St.
Frankfort, KY 40601
502 227 7270
inhughes@johnnhughespsc.com

And

Mark R. Hutchinson
Wilson, Hutchinson & Littlepage
611 Frederica St.
Owensboro, KY 42303
270 926 5011
Fax: 270-926-9394
randy@whplawfirm.com

Attorneys for Atmos Energy Corporation

Certification: I certify that is a true and accurate copy of the documents to be filed

in paper medium; that the electronic filing was transmitted to the Commission on April 22, 2019; that an original and one copy of the filing will be delivered to the Commission within two days; and that no party has been excused from participation by electronic means.

John N. Hargrave

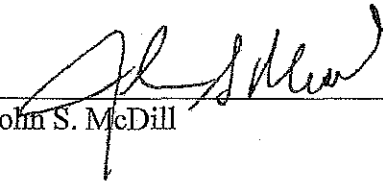
COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF)
RATE APPLICATION OF) Case No. 2018-00281
ATMOS ENERGY CORPORATION)

AFFIDAVIT

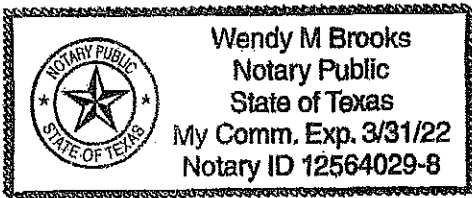
The Affiant, John S. McDill, being duly sworn, deposes and states that the attached responses to Commission Staff's first post-hearing request for information are true and correct to the best of his knowledge and belief.




John S. McDill

STATE OF Texas
COUNTY OF Dallas

SUBSCRIBED AND SWORN to before me by John S. McDill on this the 12 day of April, 2019.





Notary Public
My Commission Expires: 3/31/22

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF)
RATE APPLICATION OF) Case No. 2018-00281
ATMOS ENERGY CORPORATION)

AFFIDAVIT

The Affiant, Gregory W. Smith, being duly sworn, deposes and states that the attached responses to Commission Staff's first post-hearing request for information are true and correct to the best of his knowledge and belief.



Gregory W. Smith

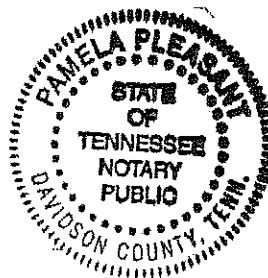
STATE OF Tennessee
COUNTY OF Williamson

SUBSCRIBED AND SWORN to before me by Gregory W. Smith on this the 11th day of April, 2019.



Notary Public

My Commission Expires: MARCH 3, 2020



Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-12 Supplement
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(SUPPLEMENTAL RESPONSE 4/22/2019)

REQUEST:

Provide the separate risk assessment studies and risk rankings for pipeline replacement in each state in which Atmos operates, including the Kentucky/Mid-States division.

SUPPLEMENTAL RESPONSE:

Below are descriptions of risk assessment processes that result in selection of pipeline replacement for each of Atmos Energy's Divisions, with references to the relevant attachments provided.

In Tennessee and Virginia, the Company uses the same processes it described for Kentucky. So although the Company does not have a quantitative 'risk-ranking for pipeline replacement projects' for Tennessee and Virginia, the process of determining what projects to undertake is comparable to Kentucky's. An overall risk assessment is derived from the analysis of Subject Matter Experts ("SMEs") as informed by the Company's Distribution Integrity Management ("DIM") plan. As previously, discussed, the DIM plan is not designed to prioritize replacement. Rather, it is designed to facilitate integrity management through relative threat identification and take additional actions as appropriate. Not all threats can be mitigated by replacement. For example, some threats are mitigated through leak surveying, corrosion control activities, damage prevention efforts or public awareness programs.

The Company's Colorado-Kansas Division prepares a formulaic replacement ranking for pipeline projects. These rankings are specific to each of those states and were developed and approved at the specific request of state regulators in those jurisdictions to be used in conjunction with accelerated pipeline replacement mechanisms. Those mechanisms, while different, are both focused primarily on bare steel replacement. The most recent pipeline prioritization rankings for Colorado and Kansas are attached as Confidential Attachments 1, 2 and 3 to this supplemental response.

The Company's Louisiana Division does not formulaically rank pipe for replacement. Rather, that Division uses SMEs, supported by a software-based tool and the Company's DIM analysis to determine what pipeline projects to undertake each year.

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The Company's Mississippi Division has its own risk model based on the guidance approved by the state regulator in the Division's tariff. The process does not formulaically rank replacement. Rather, the analysis informs the SMEs' determination of which projects to undertake each year. The most recent results and a related data request from Mississippi are attached as Confidential Attachments 4 and 5 to this supplemental response.

The Company's Texas operations perform an analysis pursuant to 16 T.A.C. §8.209. The overall determination of which projects to undertake in a year are determined by SME's and software-based tools. For a further description of the regulator-approved distribution facilities replacement plans specific to Texas, please see the Company's response and attachments to Staff Post-Hearing DR No. 1-30.

Also, although it is not a risk assessment or a study, the Company maintains a section of its public website in which it lists ongoing replacement projects throughout all eight states in which it operates. In addition to showing individual projects on a United States map, each division lists its total miles of pipeline replaced and its capital expenditure level for the prior year.

<https://www.atmosenergy.com/pipeline-projects/pipeline-replacement-projects>

ATTACHMENTS:

ATTACHMENT 1 - Atmos Energy Corporation, Staff Post-Hearing_1-12_Supplement Att1 - CO 5 Yr SSIR Rankings (CONFIDENTIAL).pdf, 2 Pages.

ATTACHMENT 2 - Atmos Energy Corporation, Staff Post-Hearing_1-12_Supplement Att2 - KS 343 2019 Annual Report (CONFIDENTIAL).pdf, 6 Pages.

ATTACHMENT 3 - Atmos Energy Corporation, Staff Post-Hearing_1-12_Supplement Att3 - KS 343 Rankings (CONFIDENTIAL).pdf, 4 Pages.

ATTACHMENT 4 - Atmos Energy Corporation, Staff Post-Hearing_1-12_Supplement Att4 -MPUS 1-7 Confidential Company Risk Ranking (CONFIDENTIAL).pdf, 1 Page.

ATTACHMENT 5 - Atmos Energy Corporation, Staff Post-Hearing_1-12_Supplement Att5 -MPUS 1-7 Confidential Company Risk Ranking (CONFIDENTIAL).pdf, 7 Pages.

Respondents: Greg Smith and John McDill