

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

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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

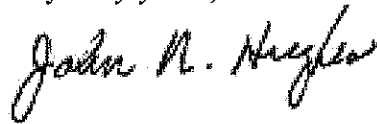
Dear Ms. Pinson:

Atmos Energy Corporation submits its completed responses to the Commission's Post Hearing Data Requests PHDR -1, which were not previously filed.

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

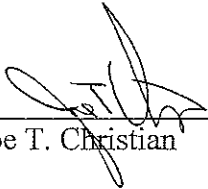
COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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

AFFIDAVIT


The Affiant, Joe T. Christian, 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.



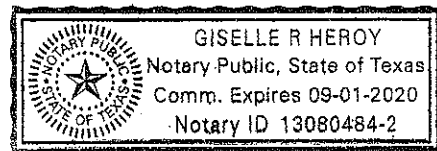
Joe T. Christian

STATE OF Texas
COUNTY OF Dallas

SUBSCRIBED AND SWORN to before me by Joe T. Christian on this the 12th day of April, 2019.



Notary Public
My Commission Expires: 9/1/2020



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, Mark A. Martin, 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.

Mark A. Martin
Mark A. Martin

STATE OF Kentucky
COUNTY OF Davies

SUBSCRIBED AND SWORN to before me by Mark A. Martin on this the 18th day of April, 2019.

Joanne M. Henderson
Notary Public

My Commission Expires: Joanne M. Henderson
NOTARY PUBLIC
State at Large, Kentucky
ID # 596005
My Commission Expires 3/22/2022

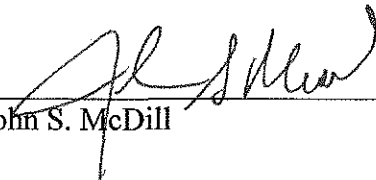
COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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

AFFIDAVIT

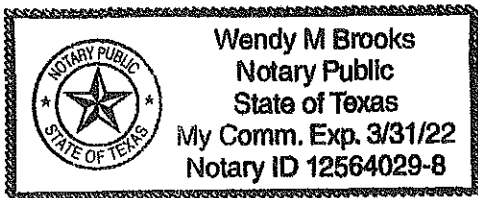
The Affiant, John S. McDill, being duly sworn, deposes and states that the attached responses to Commission Staff's first post-hearing request for information are true and correct to the best of his knowledge and belief.




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

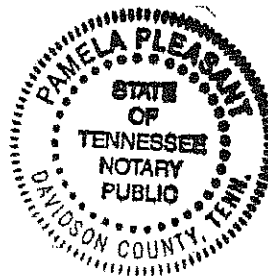
STATE OF Tennessee
COUNTY OF Williamson

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




COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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

AFFIDAVIT

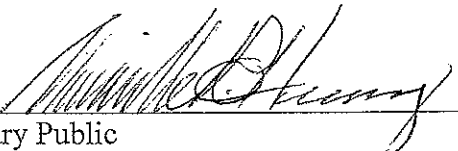
The Affiant, Gregory K. Waller, being duly sworn, deposes and states that the attached responses to Commission Staff's first post-hearing request for information are true and correct to the best of his knowledge and belief.



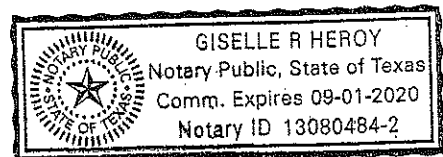
Gregory K. Waller

STATE OF Texas
COUNTY OF Dallas

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



Notary Public
My Commission Expires: 9/1/2020



Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-05
Page 1 of 1

REQUEST:

Refer to the Rebuttal Testimony of Gregory K. Waller, Exhibit GKW-R-1, page 108 of 121.

- a. For fiscal years ending 2009 through 2018, provide a schedule that compares each state's regulated net income and its percentage to Atmos's total regulated net income.
- b. For fiscal years ending 2009 through 2018, provide a schedule that compares each state's regulated cash flow and its percentage to Atmos's total regulated cash flow.

RESPONSE:

- a. Please see Attachment 1.
- b. Consistent with the Company's legal structure that includes all of its utility jurisdictions within a single legal entity, the Company is not able to distinguish a particular state's cash flow (or capitalization) from the corporate entity.

ATTACHMENT:

ATTACHMENT 1 - Atmos Energy Corporation, Staff Post-Hearing_1-05_Att1 - Net Income by State.xls, 1 Page.

Respondent: Greg Waller

Atmos Energy Corporation
 Net Income by State
 Fiscal 2009 through Fiscal 2018

State	Fiscal 2009	%	Fiscal 2010	%	Fiscal 2011	%	Fiscal 2012	%	Fiscal 2013	%	Fiscal 2014	%	Fiscal 2015	%	Fiscal 2016	%	Fiscal 2017	%	Fiscal 2018	%
Kentucky	7,703,185	4%	8,933,990	4%	12,651,427	6%	12,740,760	6%	10,912,659	4%	14,919,498	5%	15,095,841	5%	17,374,827	5%	22,922,719	6%	24,252,018	4%
Tennessee	8,308,814	4%	8,406,182	4%	8,897,927	4%	12,648,433	6%	11,798,081	5%	12,344,056	4%	10,894,043	3%	12,370,490	4%	14,888,353	4%	21,501,310	4%
Virginia	1,545,472	1%	2,369,070	1%	2,178,535	1%	1,589,398	1%	1,022,194	0%	718,237	0%	3,872,917	1%	2,931,276	1%	2,474,742	1%	7,545,701	1%
Louisiana	19,270,680	10%	19,075,237	9%	22,590,046	11%	23,253,825	11%	21,967,148	9%	24,435,425	8%	22,949,834	7%	28,622,483	8%	35,741,380	9%	44,553,714	7%
Colorado	3,854,612	2%	5,507,527	3%	5,654,200	3%	7,240,725	3%	3,801,849	2%	4,298,625	1%	4,486,733	1%	6,710,774	2%	6,896,107	2%	8,561,730	1%
Kansas	5,108,717	3%	5,178,084	3%	7,208,658	3%	7,763,052	4%	7,291,218	3%	7,919,233	3%	8,325,244	3%	9,321,691	3%	11,598,138	3%	13,854,061	2%
Mississippi	7,246,130	4%	9,983,129	5%	10,442,563	5%	11,674,323	5%	12,113,228	5%	11,843,442	4%	15,613,065	5%	19,570,848	6%	20,835,107	5%	28,301,654	5%
Texas-Distribution	56,431,624	30%	62,863,526	31%	75,255,983	36%	68,975,042	32%	84,867,568	35%	107,405,301	37%	122,477,456	39%	132,170,122	38%	148,164,495	37%	229,465,031	38%
Atmos Pipeline- Texas	41,056,246	21%	41,485,931	20%	52,415,240	25%	63,059,405	29%	68,260,315	28%	86,191,060	30%	94,662,234	30%	101,689,132	29%	107,423,624	27%	149,321,344	25%
Other	40,352,059	21%	42,036,248	20%	10,310,651	5%	7,771,523	4%	21,158,991	9%	19,742,374	7%	16,887,118	5%	19,342,407	6%	27,478,310	7%	75,707,285	13%
Total Company	190,977,539	100%	205,838,926	100%	207,601,231	100%	216,716,505	100%	243,193,250	100%	289,817,261	100%	315,074,485	100%	350,104,028	100%	396,420,973	100%	603,063,848	100%

Note: Fiscal 2018 includes the impact of the Tax Cuts and Jobs Act.

Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-06
Page 1 of 1

REQUEST:

Refer to Atmos's response to Commission Staff's Fifth Request for Information, Item 2, Attachment 1, and explain whether any of the listed projects were designed by an engineering firm under the same contract or constructed by a contractor pursuant to the same contract.

RESPONSE:

The Company does not believe that any of the projects listed in Confidential Attachment 1 to the Company's response to Staff DR No. 5-02 were designed or constructed "under the same contract" or "pursuant to the same contract" as in the manner described in the question.

As is typical in the industry, the Company has "Master Service Agreements" with multiple engineering/contractors, and an engineer/contractor could work on multiple projects that are all under that Master Service Agreement. However, individual project on the referenced attachment would also be performed pursuant to a separate Task Request Form when work is assigned.

Additionally, the Company would point out that it is very common for an individual project to be worked on by multiple contractors. It is highly unlikely that a single contractor can perform all of the various tasks (Pipeline Construction, Engineering, Construction Inspection, X-Ray/NDT, Environmental Permitting, ROW and Easement Acquisition, etc.) required by an individual project.

Respondent: Greg Smith

Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-13
Page 1 of 1

REQUEST:

Refer to Atmos's Response to Staff's Third Request, Item 27, Attachment 1. Provide the risk assessment study and risk ranking for each project.

RESPONSE:

As stated in the Company's response to Staff Post-Hearing DR No. 1-12, the Company does not have a quantitative "risk-ranking for pipeline replacement projects" for Kentucky. The Company does have a "risk assessment" for its distribution assets in the state, its Distribution Integrity Management ("DIM") plan.

The DIM plan identifies threats to Company assets in Kentucky by cost center, and not by individual pipeline segment. Therefore, the Company's response to Staff DR No. 3-27, Attachment 1, which lists individual projects, is more granular than the risk assessment created by the DIM plan. Also, as stated in the Company's response to Staff Post-Hearing DR No. 1-12, the DIM is not the sole source of information used for determining which assets to replace in Kentucky.

There is no "risk assessment study" listing each of the proposed projects. If asked to rank them, as stated in his testimony at hearing, Company witness Smith would rank the projects that are part of the Company's bare steel pipe replacement program as the highest priority. Next would come "System Integrity" projects, and then would come "System Improvement" projects.

"Growth" projects are not proposed to respond to risk and cannot be risk-ranked. Similarly, projects described as "Public Improvement," "Equipment," "Structure," and "Information Technology" cannot readily be prioritized based upon risk.

Respondent: Greg Smith

Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-14
Page 1 of 2

REQUEST:

With the approved level of capital spending for fiscal year 2019, state the rate at which Atmos would replace all pipes in its system in each state in which it operates (e.g. Atmos testified that it would be 95 years for the Commonwealth of Kentucky).

RESPONSE:

The calculation of replacement cycle for the purpose of this response is simply the number of miles of infrastructure currently in service divided by the number of miles that are projected to be replaced each year. If these factors hold true over an extended period of time, then it should indicate a forecast of long term system age. It is important to note that a single year of replacement reflects the relative progress at a point in time and that other factors will effect a complete timeline cycle of replacement (In Tennessee, for example, a significant percentage of the investment is spent on growth and public improvements i.e. road relocations). The table below reflects the amount of pipe that is planned for replacement or abandonment in the other states that Atmos Energy operates. Atmos Energy is currently filing for a pipe replacement program in Virginia, which targets unlocatable plastic. If approved, Virginia would have a similar replacement cycle as Texas and Kentucky.

The slide below reflects Atmos Energy's commitment to infrastructure replacement on a corporate level.

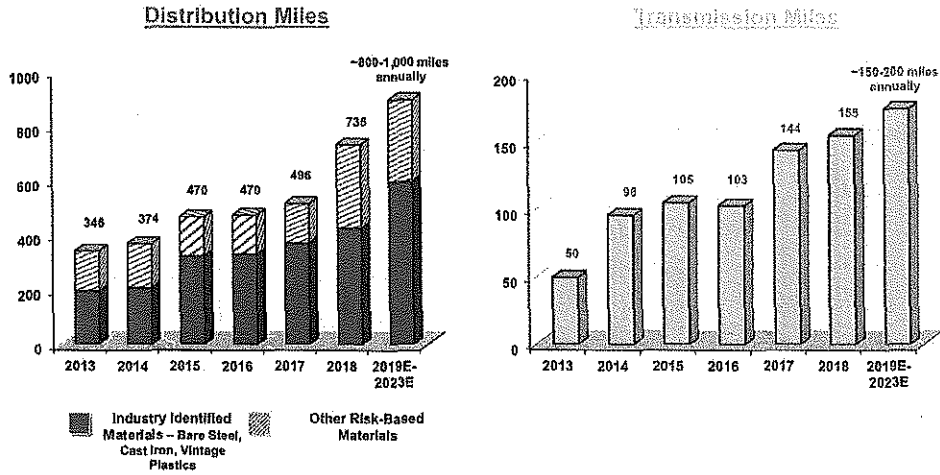
Replacement Cycle: Distribution Pipe - Replaced or Abandoned

Jurisdiction	Distribution Pipe - Replaced or Abandoned (Miles)	Distribution Pipe Inventory - 2017 DOT Report (Miles)	Replacement Cycle (years)
TX	406	38,723	95
KS	17.5	3,658	209
VA	2.5	703	281
TN	12	3,545	295
MS	51	6,493	127
LA	196	8,727	45
CO	10	3,201	320

Pipe Replacement Mileage



Estimated Miles Replaced by Fiscal Year - An Ongoing Commitment



Note: Pipeline replacement due to changes in state or federal regulations is not projected in this 5-year replacement estimate. Year over year variances in mileage replacement are driven by factors including: construction reorders, project type and permitting.

As of November 7, 2018

14

Respondent: John McDill

Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-18
Page 1 of 1

REQUEST:

Provide the amount of flotation costs included in the return on equity (ROE) for each state in which Atmos operates.

RESPONSE:

While flotation costs have not been explicitly approved or cited in Orders from the Company's other states, Company expert witnesses, including Dr. Vander Weide in the instant case, have provided testimony and support for their inclusion as a prudent variable in determining a fair and reasonable rate of return on equity.

Respondent: Joe Christian

Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-19
Page 1 of 2

REQUEST:

Provide Atmos's ROE by state for the three fiscal years ending September 30, 2018.

RESPONSE:

Please see the Company's response to Staff DR No. 2-59, which is repeated here for convenience:

Please see the most recent Atmos Energy 10-K, page 7, publicly available on the Company's website at <http://www.investquest.com/iq/a/ato/fin/10k/index.htm> for the most recently awarded ROE.

The most current available earned return for jurisdictions where the calculation is performed as part of earnings monitoring reports or rate models is as follows:

State	Filing	ROE	ROR
Colorado			8.07%
Louisiana	TLA	10.91%	
Louisiana	LGS	9.71%	
Mississippi		8.58%	
Tennessee			8.19%
Texas	Mid-Tex		6.77%
Texas	WT		6.89
Virginia	AIF	10.08%	

The Company does not have earned returns available for its distribution utilities that are not listed in the chart above.

Please also see the Company's response to Staff DR No. 3-12 from Case No. 2017-00349, which is repeated here for convenience:

- a) The most current available earned return for jurisdictions where the calculation is performed as part of earnings monitoring reports or rate models is as follows:

Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-19
Page 2 of 2

State	Filing	ROE	ROR
Colorado			7.67%
Louisiana	TLA	9.19%	
Louisiana	LGS	7.98%	
Mississippi		9.20%	
Tennessee		8.26%	
Texas	Mid-Tex		7.05%
Texas	WT		6.44%
Virginia	AIF	9.48%	

Respondent: Joe Christian

Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-20
Page 1 of 1

REQUEST:

Provide Atmos's size premium contained in the ROE granted by state using each state's most recent proceeding.

RESPONSE:

While size premium has not been explicitly approved or cited in Orders from the Company's other states, Company expert witnesses, including Dr. Vander Weide in the instant case, have provided testimony and support for its inclusion as a prudent variable in determining a fair and reasonable rate of return on equity.

Respondent: Joe Christian

Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-29
Page 1 of 1

REQUEST:

Provide how many miles of each type of pipeline are left in Atmos's system in Kentucky and how many miles are supposed to be replaced. (e.g., bare steel, low-pressure systems, Aldyl-A, unlocatable plastic pipe, etc.)

RESPONSE:

- 188 miles of Bare Steel
- 210 miles of Aldyl-A and Unlocatable plastic
- 45 miles of Low Pressure (of which 60% already is bare steel and included within the bare miles above)

As stated in the testimony of Greg Smith, the company plans to continue Bare Steel pipe replacement on the schedule already stipulated by Case No. 2017-00349. At this time, LP system replacement is scheduled to be complete in FY2023. We do not have a timeline for completion of Aldyl-A/Unlocatable plastic. Projects targeting this material type extend past our current 5 year plan.

Respondent: Greg Smith

Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-30
Page 1 of 2

REQUEST:

In Mr. McDill's rebuttal testimony, he stated that Texas has enacted policy measures that mandate the replacement of a certain percentage of high relative risk assets on an annual basis.

- a. Provide the percentage of high relative risk assets that Texas policy require Atmos to replace on an annual basis.
- b. Provide the percentage of high relative risk assets that Atmos actually replaces in Texas on an annual basis.
- c. Describe how a high relative risk asset is defined.

RESPONSE:

- a. Pursuant to Texas Administrative Code ("TAC") §8.209(h): "Unless otherwise approved in an operator's risk-based plan, all replacement programs require a minimum annual replacement of 5% of the pipeline segments or facilities posing the greatest risk and identified for replacement pursuant to this section."
- b. The Company has consistently exceeded the minimum requirements of TAC §8.209. The actual percentage of high relative risk assets replaced varies from year to year. The actual footage replaced for each year in the Company's Mid-Tex Division is shown on its annual 8.209 reports to the RRC, which are included as Attachment 1 through Attachment 6 to this response. The actual footage replaced for each year in the Company's West Texas Division is shown on its annual 8.209 reports to the RRC, which are included as Attachments 7 through Attachment 10 to this response.
- c. Pursuant to TAC §8.209(e): "Each operator must create a risk model that will identify by segment those lines that pose the highest risk ranking or consequence of failure. The determination of risk is based on the degree of hazard associated with the risk factors assigned to the pipeline segments or facilities within each of the operator's distribution systems. The priority of service line or facility replacement is determined by classifying each pipeline segment or facility based on its degree of hazard associated with each risk factor." The factors to be considered are described in more detail in TAC §8.209. Also, please see Attachment 11 to this response, which is the Company's most recently approved Atmos Energy Distribution Facilities Replacement Written Plan for Texas.

Case No. 2018-00281
Atmos Energy Corporation, Kentucky Division
Staff Post-Hearing DR Set No. 1
Question No. 1-30
Page 2 of 2

ATTACHMENTS:

ATTACHMENT 1 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att1 - 8.209_annual_2015.pdf, 7 Pages.

ATTACHMENT 2 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att2 - 8.209_annual_2016.pdf, 9 Pages.

ATTACHMENT 3 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att3 - 8.209_annual_2016_revised.pdf, 1 Page.

ATTACHMENT 4 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att4 - 8.209_annual_2017.pdf, 8 Pages.

ATTACHMENT 5 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att5 - 8.209_July 2_2018_Supplement.pdf, 4 Pages.

ATTACHMENT 6 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att6 - 8.209_annual_2018.pdf, 12 Pages.

ATTACHMENT 7 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att7 - 2015 Completion Report Submission.pdf, 4 Pages.

ATTACHMENT 8 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att8 - 2016 Completion Report Submission.pdf, 4 Pages.

ATTACHMENT 9 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att9 - 2017 Completion Report Submission.pdf, 4 Pages.

ATTACHMENT 10 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att10 - 2018 Completion Report Submission.pdf, 4 Pages.

ATTACHMENT 11 - Atmos Energy Corporation, Staff Post-Hearing_1-30_Att7 - Written Plan 8.209.pdf, 8 Pages.

Respondent: John McDill



March 15, 2016

Ms. Kari French
Director, Gas Services Division
Railroad Commission of Texas

RECEIVED
RRC OF TEXAS
MAR 09 2016
PIPELINE SAFETY DIVISION
AUSTIN, TEXAS

Dear Kari:

Please find attached for your review and approval the Atmos Energy Mid-Tex Division's Distribution Facilities Replacement Completion Report and Distribution Facilities Replacement Work Plan pursuant to the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule.

During the calendar year ending December 31, 2015, the Atmos Energy Mid-Tex Division replaced facilities based on an assessment of existing, known risk and in response to changing conditions that created risk as they presented themselves during the year (i.e. occurrence of leaks, newly identified threats). In total, the Mid-Tex Division replaced approximately 514,000 feet of steel main, 333,000 feet of cast iron main, 162,000 feet of plastic main, and 17,000 service lines. The Distribution Facilities Replacement Completion Report detailing the distribution facilities replaced by the Mid-Tex Division during the calendar year ending December 31, 2015 is included as an enclosure to this correspondence.

During the calendar year ending December 31, 2016, the Atmos Energy Mid-Tex Division will continue to replace facilities based on an assessment of existing, known risk and in response to changing conditions that create risk as they present themselves during the year. In total, the Mid-Tex Division plans to replace approximately 448,000 feet of steel main, 237,000 feet of cast iron main, 132,000 feet of plastic main, and 15,000 service lines. The Distribution Facilities Replacement Work Plan outlining the facilities proposed for replacement by the Mid-Tex Division during the calendar year ending December 31, 2016 is included as an enclosure to this correspondence.

Atmos Energy recognizes that risk characterized in the Work Plan is defined by 'known' conditions that exist within facilities in the distribution system at the time the risk assessment is performed and the Work Plan is established. A risk model cannot quantify unknown, undiscovered or unranked risk. Atmos Energy will take into account these 'unknown' conditions in any given year as they present themselves and may retire or replace facilities in order to mitigate these risks.

We appreciate the opportunity to update the Railroad Commission on work completed in 2015 and your consideration of our replacement plans for 2016. We look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Andy Treadway".

Andy Treadway
Director, Regulatory and Compliance - Mid-Tex

Enclosures (2)

Distribution Facilities Replacement Completion 2015
Atmos Energy Mid-Tex Division

Completion Report (2015)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	514,753	12,365	-
Cast Iron	333,635	-	-
Copper	-	57	-
Plastic	162,495	4,601	-
Misc	-	-	23,313
Grand Total	1,010,883	17,023	23,313

Work Plan (2016)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	448,800	11,129	-
Cast Iron	237,600	-	-
Copper	-	500	-
Plastic	132,000	4,141	-
Grand Total	818,400	15,769	20,982

Distribution Facilities Replacement Completion 2015
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Abilene	211069	17,628	8,243	1,906	322	-	-	390
Addison	610005	-	5	-	-	1	-	-
Alba	310012	-	8	-	1	-	-	1
Albany	611443	-	268	-	7	4	-	5
Allen	610007	-	-	9	-	-	-	38
Alvarado	610012	-	-	-	1	1	-	1
Alvord	610013	-	-	-	-	1	-	-
Anna	610018	-	-	-	1	1	-	9
Anson	211075	-	-	-	-	-	-	5
Archer City	611445	-	166	-	5	2	-	-
Argyle	610021	-	-	-	-	1	-	3
Arlington	610023	-	3,451	1,158	148	62	-	213
Athens	310028	-	15	-	6	-	-	42
ATHENS NATL. GAS (Dist)	310198	-	-	-	38	-	-	-
Aubrey	610031	-	-	-	-	-	-	2
Austin	411519	-	-	-	-	-	-	26
Avalon	610033	-	613	-	2	43	-	31
Avery	310056	-	-	-	-	1	-	1
Azle	610036	-	8	-	7	-	-	13
Baird	611446	-	-	-	4	-	-	8
Bald Springs	611383	-	456	-	12	2	-	10
Ballinger	211078	-	596	-	9	3	-	3
Bandera	410111	-	-	-	3	-	-	4
Bangs	611447	-	-	-	-	1	-	3
Bardwell	610038	-	-	-	8	-	-	6
Barry	310064	-	-	-	-	-	-	-
Bartlett	410115	-	200	-	-	-	-	-
Bedford	610042	-	-	-	24	1	3	31
Bellevue	610043	-	450	-	1	2	-	1
Bellmead	962845	-	-	-	1	-	-	2
Bells	610044	-	-	-	1	1	-	-
Belton	410950	-	279	284	4	2	-	6
Ben Hur	961626	-	-	-	1	-	-	1
Ben Wheeler	310076	-	65	-	1	-	-	1
Benbrook	611434	-	-	-	5	2	-	45
Benjamin	110880	-	-	-	-	-	-	-
Bertram	410132	-	8	-	5	2	-	6
Beverly Hills	962847	-	2,372	-	-	-	-	-
Blooming Grove	310094	-	-	-	3	1	-	1
Blossom	310095	-	-	-	-	1	-	-
Blue Mound	612123	-	-	-	6	-	-	8
Blum	610048	-	-	-	-	-	-	-
Bogata	310099	-	-	-	1	1	-	2
Bonham	310101	-	945	115	11	9	-	15
Bowie	610053	-	3,526	13	22	14	-	14
Boyd	610055	-	-	-	-	-	-	-
Brenoud	410978	-	297	-	-	5	-	1
Bridgeport	610058	-	2,300	-	29	20	-	70
Bronfo	211082	-	-	-	-	2	-	-
Brookston	310108	-	-	-	-	-	-	-
Brownwood	611449	379	10,957	450	155	6	-	70
Brushy Creek	411255	-	-	-	2	-	-	2
Bryan	411071	-	6,695	2,581	106	93	-	377
Buckholts	410939	-	4	-	1	-	-	3
Buffalo	311779	-	5	-	5	3	-	7
Buffalo Gap	211083	-	-	-	1	-	-	1
Burkburnett	611451	-	-	51	150	53	-	277
Burleson	610071	-	-	-	9	1	-	139
Burnet	410161	-	-	-	16	4	-	19
Byers	611455	-	200	-	-	1	-	1
Caddo Mills	310124	-	-	24	1	1	-	1
Caldwell	411076	-	557	-	46	1	-	48
Calvert	411041	-	-	-	3	-	-	4
Cameron	410940	301	837	-	2	1	-	1
Campbell	310125	-	43	-	-	-	-	-
Canton	310127	-	-	5	6	2	-	3
Carbon	611458	-	-	-	-	-	-	1
Carrollton	610077	-	-	29	15	5	-	56
Cayuga	311480	-	-	-	1	1	-	2
Cedar Hill	610084	-	-	5	6	2	-	8
Cedar Park	411284	-	8	-	-	3	-	317
Celeste	310139	-	-	8	-	-	-	-
Celina	610089	-	192	-	2	1	-	63
Center Point	410186	-	-	-	1	2	-	1
Centerville	310141	-	533	-	8	4	-	12
Chandler	310145	-	-	-	-	3	-	3
Chapel Hill	310968	-	-	-	1	-	-	1
Chico	610098	-	-	-	1	-	-	-
Childress	110099	-	1,843	-	20	1	-	14
Chillicothe	111024	-	-	-	2	-	-	-
Chilton	410979	-	-	-	2	1	-	-
Cisco	611460	-	50	-	1	-	-	6
Clarksville	310161	-	-	-	3	3	-	1
Cleburne	610103	-	42,855	282	187	245	8	384
Clifton	610107	-	-	419	-	15	2	11
Clyde	611461	-	373	-	6	2	-	9
Clyde (DRS6624)	611461	-	-	-	1	-	-	-

Cockrell Hill	610134	17,080	3,160	12	71	4	-	-	92
Coleman	611465	-	1,680	-	40	14	-	-	18
College Station	411071	-	1,479	18	194	21	-	-	627
Colleyville	610113	-	11,590	1,750	13	57	-	-	43
Collinville	610114	-	2,018	-	16	-	-	-	17
Colorado City	211089	-	246	-	5	-	-	-	5
Comanche	611466	-	3,770	30	33	2	-	-	26
Comfort	410209	-	14	-	2	1	-	-	3
Commerce	310168	-	1,276	62	12	7	-	-	2
Como	310171	-	-	-	-	1	-	-	-
Coolidge	610121	-	-	-	2	-	-	-	1
Cooper	310174	-	-	15	-	4	-	-	-
Coppell	610122	-	-	1,409	2	8	-	-	29
Copperas Cove	410945	-	-	-	2	1	-	-	2
Corinth	610125	-	-	90	-	1	-	-	3
Corsicana	411360	-	1,943	220	44	27	-	-	24
Crandall	310192	-	-	-	1	-	-	-	-
Crawford	610130	-	5	-	6	-	-	-	7
Crossroads	611198	-	-	-	-	-	-	-	1
Crowley	611435	-	-	-	6	2	-	-	12
Cumby	310218	-	-	-	1	1	-	-	-
Dallas	610134	99,279	106,348	6,176	3,249	369	11	-	4,246
Dalworthington Gardens	611425	-	-	-	-	-	-	-	2
Dawson	311780	-	812	-	2	-	-	-	1
De Leon	611468	-	-	-	-	-	-	-	2
Deatur	610150	-	-	-	3	1	-	-	1
Denison	610153	-	2,296	177	43	21	-	-	52
Denison Grayson Co IP	610268	-	-	-	2	-	-	-	-
Denton	610162	-	11,783	19,769	31	133	-	-	165
Deport	310239	-	-	-	1	1	-	-	-
Desdemona	611469	-	310	284	-	-	-	-	-
DeSoto	610148	-	-	1,274	12	5	-	-	26
Detroit	310241	-	583	-	1	3	-	-	6
Dodd City	310248	-	606	4	-	-	-	-	1
Dublin	611470	-	2,322	175	21	3	-	-	9
Duncanville	610180	-	2,036	195	39	8	1	-	45
E3 HP	632288	-	-	-	1	-	-	-	1
Early	611471	-	-	-	-	-	-	-	4
Eastland	612219	-	1,015	125	7	1	-	-	12
Ector	310280	-	-	-	3	-	-	-	1
Edgecliff Village	611436	-	-	-	5	1	-	-	7
Electra	611474	-	1,134	17	10	3	-	-	6
Elm Mott	610189	-	134	-	3	1	-	-	3
Elmo	310290	-	-	-	1	-	-	-	1
Emory	310294	-	-	-	-	-	-	-	1
Ennis	610191	-	-	286	14	6	-	-	12
Eules	610200	-	14	-	34	3	-	-	58
Eustace	310312	-	-	-	-	-	-	-	-
Evant	411118	-	20	-	4	1	-	-	3
Everman	612054	-	120	-	3	2	-	-	7
Fairfield	311900	-	261	10	-	-	-	-	-
Fairview	962834	-	-	5,435	-	5	-	-	-
Farmers Branch	610208	-	85	5,830	64	9	-	-	89
Farmersville	612203	-	2,325	280	15	-	-	-	38
Fate	610209	-	-	-	1	-	-	-	-
Ferris	610210	-	3,570	485	1	5	-	-	14
Flower Mound	610215	-	4,678	124	-	2	-	-	8
Forest Hill	612055	-	-	-	5	18	1	-	12
Forney	310325	-	-	-	2	1	-	-	1
Forreston	610216	-	-	-	-	-	-	-	-
Fort Worth	610226	39,429	80,282	5,359	1,296	933	29	-	2,039
Fort Worth ML-10 (Hanger C-O)	610219	-	-	-	1	-	-	-	-
Franklin	411043	-	608	-	1	1	-	-	-
Frankston	310329	-	-	-	-	1	-	-	1
Fredericksburg	410285	-	31	-	17	6	-	-	20
Frisco	610233	-	203	5	3	2	-	-	14
Frost	310335	-	-	-	5	-	-	-	2
Gainesville	610237	-	1,887	42	8	3	-	-	18
Gainesville ML-03	610241	-	-	-	2	-	-	-	-
Garland	610244	-	7,215	187	285	26	-	-	399
Gatesville	411038	-	152	225	5	1	-	-	6
Georgetown	411289	-	1,536	370	14	11	-	-	685
Glen Rose	610256	-	2,434	81	14	-	-	-	16
Glen Heights	610180	-	-	-	-	1	-	-	10
Godley	610259	-	-	-	-	4	-	-	1
Goldthwaite	611995	-	250	-	57	24	-	-	104
Goodlow	310503	-	-	440	12	3	-	-	-
Gorce	110883	-	-	-	1	-	-	-	3
Gorman	611478	-	-	-	2	-	-	-	-
Granbury	610263	-	90	-	8	-	-	-	10
Grand Prairie	610265	-	15,334	40	490	146	-	-	704
Grandview	610266	-	43	-	2	-	-	-	2
Granger	410309	-	333	177	2	-	-	-	-
Grapevine	610267	-	11	5	10	3	-	-	15
Greenville	310388	-	4,730	293	26	11	-	-	37
Groesbeck	612001	-	21	-	2	1	-	-	3
Gustine	611479	-	-	-	2	-	-	-	2
Haltom City	612026	-	3,834	94	35	42	2	-	95
Hamilton	411119	-	1,612	-	16	-	-	-	5
Hamlin	211099	-	1,302	-	1	-	-	-	1
Harrier Heights	411047	-	3,416	404	12	12	-	-	9
Harrod	611481	-	-	-	1	-	-	-	-
Haskell	110884	-	394	-	3	-	-	-	7
Haslet	610282	-	728	-	-	-	-	-	-
Hawley	211100	-	-	-	-	-	-	-	1
Hearne	411044	-	-	-	17	4	-	-	16

Heath	610283	-	181	-	-	6	-	-
Henrietta	611482	-	313	-	3	2	-	4
Hermleigh	211101	-	-	-	1	-	-	2
Hico	611999	-	28	-	4	-	-	-
Hickory Creek	610336	-	-	-	-	-	-	11
Highland Park	612100	10,496	-	-	130	32	-	181
Highland Village	610352	-	-	215	-	1	-	2
Hillsboro	610288	-	4,533	429	41	7	-	54
Holland	410339	-	-	-	-	-	-	1
Holiday	611483	-	955	11	4	4	-	12
Honey Grove	310440	-	-	10	5	5	-	1
Howe	610292	-	-	-	-	-	-	1
Hubbard	610293	-	-	-	1	1	-	1
Hurst	610297	-	71	51	55	9	-	53
Hutto	411280	-	-	-	-	-	-	128
Iowa Park	611484	-	1,134	65	8	2	-	20
Irving	610304	-	11,906	1,033	405	350	-	904
Italy	610308	-	-	-	2	-	-	1
Itasca	610309	-	68	11	10	-	-	2
Jean	611488	-	-	-	-	-	-	1
Josephine	612205	-	-	-	-	2	-	-
Joshua	610315	-	-	-	2	3	-	3
Justin	610321	-	290	240	1	-	-	1
Kamay	611489	-	15	25	3	-	-	3
Kaufman	310501	-	-	-	11	4	-	10
Keene	610323	-	-	-	-	-	-	8
Keller	610324	-	916	694	3	8	2	18
Kemp	310502	-	31	-	-	-	-	-
Kennedale	612056	-	-	-	1	-	-	25
Kerens	310503	-	364	5	7	4	-	1
Kerrville	410360	-	1,542	2,819	30	14	-	40
Killeen	411048	-	1,459	894	5	4	-	12
Kleberg	611384	-	-	-	-	-	-	1
Knox City	110885	-	-	-	-	-	-	1
Kosse	610332	-	-	-	2	-	-	2
Krum	610333	-	-	-	1	-	-	2
L29 HP	411368	-	-	-	1	-	-	1
Lacy Lakeview	962850	-	281	-	1	-	-	2
Ladonia	310530	-	-	-	-	1	-	1
Lake Dallas	610336	-	-	-	-	1	-	1
Lake Worth	612669	-	-	-	11	2	1	13
Lakeside	612668	-	-	-	2	-	-	3
Lampasas	411611	-	457	-	22	2	-	32
Lancaster	610341	-	937	33	14	4	-	15
Lawn	211108	-	-	-	1	-	-	1
Leander	411294	-	-	2,319	-	-	-	807
Leona	311916	-	-	-	1	-	-	-
Leonard	310546	-	84	-	2	1	-	2
Lewisville	610350	-	193	118	3	5	-	12
Lexington	410400	-	-	-	2	2	-	5
Liberty Hill	411294	-	-	-	-	-	-	39
Lillian	610358	-	-	-	-	-	-	-
Lindsay	610360	-	-	-	-	-	-	1
Lipan	611491	-	-	-	1	-	-	-
Little Elm	610946	-	-	960	-	3	-	4
Little River-Academy	410954	-	5	-	2	-	-	2
Llano	410488	-	6	-	1	2	-	6
Lometa	410948	-	-	-	1	-	-	2
Lone Oak	310872	-	-	-	-	1	-	26
Longview	310882	-	3,151	1,334	18	12	-	19
Loraine	211109	-	-	-	-	-	-	-
Lorena	610955	-	-	-	1	-	-	-
Loti	410981	-	-	-	1	-	-	-
Lueders	211110	-	-	-	-	-	-	-
Mabank	310903	-	420	5	8	-	-	-
Madisonville	311631	-	360	-	4	6	-	12
Malakoff	310904	-	-	-	1	1	-	1
Malone	610963	-	-	-	2	-	-	-
Manor	410510	-	-	-	-	-	-	11
Mansfield	610964	-	545	1,010	5	15	-	77
Marble Falls	410512	-	112	-	4	2	-	9
Margaret	110100	-	-	-	1	-	-	3
Martin	410982	-	1,356	130	11	21	-	8
Martin ML-02	410984	-	-	-	1	-	-	-
Mart	610965	-	520	-	4	2	-	2
May	611500	-	-	-	-	-	-	-
Maypearl	610966	-	-	-	1	4	-	2
McGregor	610967	-	5,303	119	69	18	-	134
McKinney	610969	-	2,374	120	20	25	-	215
Megargel	611501	-	37	-	-	-	-	3
Melissa	610975	-	-	-	-	-	-	34
Merkel	211113	-	1,089	134	3	1	-	9
Mesquite	610980	-	225	236	12	15	-	18
Mexia	610983	-	91	200	10	-	-	4
Midlothian	610984	-	363	-	3	4	-	8
Miles	211114	-	-	-	-	1	-	-
Milford	610986	-	-	-	-	8	-	-
Montagne	610993	-	-	-	1	-	-	1
Moody	610995	-	-	-	2	-	-	1
Moran	611502	-	-	-	1	-	-	1
Morgan	610996	-	91	8	-	-	-	-
Muenster	610998	-	-	-	3	2	-	3
Munday	110894	-	1,377	-	1	-	-	3
Murphy	610999	-	-	-	-	1	-	2
Myra	611000	-	-	-	-	-	-	-
N Richland Hills	612028	-	-	-	22	-	4	34

Nash R/W	611001	-	-	-	1	-	-	-	1
Nevada	612207	-	-	-	1	1	-	-	3
Newark	611004	-	-	-	-	3	-	-	1
Newcastle	611503	-	80	-	1	-	-	-	8
Nocona	611016	-	340	-	10	1	-	-	9
Nolanville	411050	-	191	126	39	17	-	-	112
Normangee	311633	-	597	-	-	2	-	-	-
North Richland Hills	612028	-	250	1,875	19	20	-	-	34
Northlake	612545	-	-	-	-	-	-	-	34
North Zuleh	311634	-	-	-	-	1	-	-	-
Novice	611504	-	-	-	1	-	-	-	2
Oglesby	611035	-	-	-	-	-	-	-	1
Oklamion	611507	-	650	6	2	-	-	-	-
Olden	611510	-	-	-	-	-	-	-	1
Olney	611511	-	525	5	11	-	-	-	24
ORAI	331444	-	-	-	1	-	-	-	1
Ovilla	611072	-	-	-	-	-	-	-	4
Palcetine	311008	-	4,563	-	9	5	-	-	33
Palmer	611040	-	127	5	5	5	-	-	5
Pantego	611426	-	-	-	3	-	-	-	4
Paradise	611043	-	-	-	1	-	-	-	1
Paris	311017	14,782	7,714	85	77	43	-	-	113
Paris-Arthur City Line E16	311082	-	-	-	2	-	-	-	-
Paris-Reno Line E	311025	-	-	-	3	-	-	-	-
Petrolia	611515	-	-	-	1	1	-	-	2
Petty	311041	-	-	-	1	1	-	-	-
Pflugerville	411296	-	-	207	1	2	-	-	647
Pilot Point	611052	-	1,050	1,143	3	9	-	-	5
Piano	611054	-	-	3,463	17	21	-	-	70
Point	311079	-	9	5	1	-	-	-	1
Ponder	611057	-	-	-	1	-	-	-	1
Pottsboro	611061	-	-	-	2	-	-	-	4
Princeton	611064	-	1,200	90	1	12	-	-	25
Prosper	611070	-	-	-	-	1	-	-	37
Quannah	110900	-	3,096	150	10	-	-	-	1
Quinlan	311096	-	-	12	2	1	-	-	-
Quitman	311097	-	193	-	7	-	-	-	8
Ranger	611517	-	567	-	2	-	-	-	4
Ravenna ML	311144	-	-	-	1	-	-	-	2
Red Oak	611072	-	-	-	3	1	-	-	4
Rendon	611435	-	-	-	-	3	-	-	1
Retreat	311157	-	-	-	1	2	-	-	-
Rheme	611082	-	-	-	-	1	-	-	1
Richardson	611083	-	1,457	25,988	40	423	-	-	302
Richland Hills	612027	-	294	-	19	7	-	-	26
Riesel	611085	-	-	-	1	1	-	-	1
Rio Vista	611086	-	-	-	-	-	-	-	-
River Oaks	612670	-	-	-	13	-	-	-	15
Roanoke	611089	-	1,100	47	4	11	-	-	26
Robert Lee	211123	-	-	-	3	-	-	-	5
Robinson	962853	-	13	-	2	17	1	-	18
Roby	211125	-	16	-	1	-	-	-	2
Rockdale	410626	638	317	110	12	1	-	-	15
Rockwall	611090	-	174	386	-	4	-	-	7
Roscoe	211127	-	17	-	-	1	-	-	-
Rosebud	410943	-	11,049	-	8	1	-	-	2
Rotan	211128	-	-	-	-	-	-	-	3
Round Rock	410633	-	13	1,009	3	3	-	-	1,052
Rowlett	611105	-	2,806	893	-	3	-	-	6
Roxton	311171	-	-	5	-	2	-	-	-
Royse City	611114	-	541	145	1	2	-	-	3
Rule	110905	-	-	-	1	-	-	-	-
Sachse	611119	-	-	-	1	-	-	-	1
Saginaw	611121	-	-	8	6	2	-	-	9
Saint Jo	611122	-	-	-	1	-	-	-	-
San Angelo	211132	-	8,682	269	65	37	-	-	141
San Saba	611996	-	12	-	9	1	-	-	10
Sanger	611125	-	15	-	-	1	-	-	1
Sansom Park	612671	-	-	-	6	3	-	-	13
Santa Anna	611521	-	-	-	2	-	-	-	-
Savoy	611126	-	21	-	2	-	-	-	4
Sengoville	611387	-	2,633	70	2	4	-	-	5
Seymour	611523	-	667	5	18	8	-	-	19
Shady Shores	611132	-	-	-	-	2	-	-	2
Sherman	611136	518	1,901	200	31	10	1	-	98
Snyder	211139	-	292	-	19	3	-	-	25
Somerville	411080	-	-	595	1	12	-	-	38
Southlake	611162	-	3,505	5,481	3	15	-	-	21
Southmayd	611163	-	-	-	1	-	-	-	1
Springtown	611165	-	1,114	547	-	1	-	-	-
Stamford	211478	-	1,805	8	4	1	-	-	4
Star	611997	-	-	-	-	-	-	-	1
Star Harbor	311228	-	-	19,222	1	290	-	-	118
Stephenville	611556	-	337	25	9	3	-	-	6
Strawn	611526	-	-	-	-	-	-	-	-
Streetman	311901	-	-	-	-	-	-	-	-
Sulphur Springs	311237	-	2,069	795	33	29	-	-	37
Sunnyvale	611388	-	10	-	-	-	-	-	-
Sweetwater	211142	-	795	-	21	7	-	-	28
Talpa	612020	-	-	-	3	-	-	-	-
Tarrant County North	610226	-	-	-	-	-	-	-	1
Taylor	410708	-	331	-	16	5	-	-	12
Tegue	311902	-	427	1,900	15	10	-	-	17
Temple	410955	-	2,055	9,613	204	107	-	-	234
Terrell	311258	-	2,129	7	4	10	-	-	4
The Colony	610116	-	-	-	-	1	-	-	19

Thorndale	410777	-	-	-	-	-	-	1
Thornton	611366	-	-	-	4	1	-	2
Thrall	410780	-	-	-	6	-	-	6
Throckmorton	611529	-	-	-	-	-	-	6
Tioga	611194	-	16	4	1	-	-	1
Tom Bean	611195	-	-	-	1	3	-	3
Trent	211148	-	-	5	-	1	-	1
Trenton	311310	-	1,100	8	11	-	-	15
Trinidad	311315	-	-	-	-	-	-	-
Trophy Club	612301	-	-	-	-	-	-	1
Troy	410975	-	-	1,035	4	-	-	-
Tuscola	211150	-	-	-	-	-	-	-
Tye	211152	-	1,291	-	8	-	-	8
University Park	612099	23,695	-	-	330	40	-	527
Valera	611530	-	-	-	1	-	-	1
Valley Mills	611211	-	-	-	-	1	-	1
Van Alstyne	611213	-	-	-	-	-	-	62
Vera	110909	-	-	-	-	-	-	1
Venus	611214	-	-	-	-	1	-	-
Vernon	611532	-	1,591	-	31	7	-	22
View ML-15	211156	-	-	-	1	-	-	1
Waco	611218	66,555	17,826	1,261	773	97	1	1,385
Waco ML-15	962856	0	-	-	2	-	-	-
Walnut Springs	611228	-	-	28	-	-	-	-
Watauga	611229	-	109	4,045	24	3	-	64
Waxahachie	611230	-	1,713	427	29	14	-	53
Weinert	110910	-	-	-	-	-	-	-
West	611240	-	4,499	1,830	14	50	-	67
Westminster	611244	-	-	-	1	-	-	2
Westover Hills	610226	-	-	-	-	2	-	3
Westworth Village	612672	-	-	-	6	4	-	10
White Settlement	612673	-	-	275	11	8	-	29
Whitehouse	311383	-	-	-	13	6	-	20
Whitesboro	611248	-	406	143	4	-	-	8
Whitewright	611251	-	-	-	1	-	-	-
Whitney	611252	-	-	-	3	-	-	2
Wichita Falls	611539	-	30,581	6,907	1,316	167	-	1,467
Wilmer	611264	-	-	-	7	2	-	7
Wingate	211159	-	-	-	1	1	-	1
Winters	211160	-	710	-	7	1	-	3
Wolf City	311402	-	-	-	1	-	-	1
Woodway	962861	-	-	-	-	-	-	3
Wortham	611271	-	2,611	-	10	3	-	7
Wylie	611273	-	-	-	9	-	-	18
X20-5	632482	-	-	-	2	-	-	2
<i>Summary</i>		<i>333,635</i>	<i>514,753</i>	<i>162,495</i>	<i>12,365</i>	<i>4,601</i>	<i>57</i>	<i>23,313</i>



March 15, 2017

Ms. Kari French
Director, Oversight and Safety Division
Railroad Commission of Texas

Ms. French:

Please find attached for your review and approval the Atmos Energy Mid-Tex Division's Distribution Facilities Replacement Completion Report and Distribution Facilities Replacement Work Plan pursuant to the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule.

During the calendar year ending December 31, 2016, the Atmos Energy Mid-Tex Division replaced facilities based on an assessment of existing, known risk and in response to changing conditions that created risk as they presented themselves during the year (i.e. occurrence of leaks, newly identified threats, etc.). In total, the Mid-Tex Division replaced approximately 718,270 feet of steel main, 274,515 feet of cast iron main, 170,218 feet of plastic main, and 20,370 service lines. The Distribution Facilities Replacement Completion Report detailing the distribution facilities replaced by the Mid-Tex Division during the calendar year ending December 31, 2016 is included as an enclosure to this correspondence.

During the calendar year ending December 31, 2017, the Atmos Energy Mid-Tex Division will continue to replace facilities based on an assessment of existing, known risk and in response to changing conditions that create risk as they present themselves during the year. In total, the Mid-Tex Division plans to replace approximately 634,000 feet of steel main, 396,000 feet of cast iron main, 123,000 feet of plastic main, and 14,000 service lines. The Distribution Facilities Replacement Work Plan outlining the facilities proposed for replacement by the Mid-Tex Division during the calendar year ending December 31, 2017 is included as an enclosure to this correspondence.

Atmos Energy recognizes that risk characterized in the Work Plan is defined by 'known' conditions that exist within facilities in the distribution system at the time the risk assessment is performed and the Work Plan is established. A risk model cannot quantify unknown, undiscovered or unranked risk. Atmos Energy will take into account these 'unknown' conditions in any given year as they present themselves and may retire or replace facilities in order to mitigate these risks.

We appreciate the opportunity to update the Railroad Commission on work completed in 2016 and your consideration of our replacement plans for 2017. We look forward to your response.

Sincerely,

A handwritten signature in cursive script that reads "Marlo A. Sutton".

Marlo Sutton
Director, Compliance, Mid-Tex

Enclosures (2)

Distribution Facilities Replacement Reporting

Atmos Energy Mid-Tex Division

Completion Report (2016)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	718,270	15,253	-
Cast Iron	274,515	-	-
Copper	-	478	-
Plastic	170,218	4,639	-
Misc	-	-	29,015
Grand Total	1,163,003	20,370	29,015

Work Plan (2017)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	634,000	11,000	-
Cast Iron	396,000	-	-
Plastic	123,000	3,000	-
Misc	-	-	26,000
Grand Total	1,153,000	14,000	26,000

Distribution Facilities Replacement Completion Report (2016)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	
Abbott	610001	-	553	-	-	-	-	3
Ablene	211069	1,202	12,594	335	449	32	-	426
Addison	610005	-	3,660	170	5	-	-	1
Alba	310012	-	-	-	-	2	-	-
Albany	611443	-	428	-	3	2	-	3
Allen	610007	-	-	5	1	-	-	155
Alvarado	610012	-	504	2,834	4	27	-	26
Anna	610018	-	-	-	-	-	-	114
Anson	211075	-	2,198	-	15	1	-	17
Archer City	611445	-	727	-	4	8	-	9
Argyle	610021	-	-	-	1	-	-	29
Arlington	610023	-	8,745	2,990	36	119	-	397
Athens	310028	-	885	-	22	-	-	16
ATHENS NATL. GAS (Dist)	310198	-	-	-	-	-	-	5
Aubrey	610031	-	-	-	-	1	-	-
Aurora	611082	-	-	-	-	-	-	2
Austin	411519	-	-	-	-	-	-	126
Austonio	311629	-	-	-	-	-	-	2
Avalon	610033	-	-	-	-	26	-	1
Avery	310056	-	-	-	3	2	-	-
Azle	610036	-	1,713	-	16	1	10	26
Baird	611446	-	3,656	-	11	-	-	5
Balch Springs	611383	-	2,676	325	146	11	-	21
Ballinger	211078	-	549	-	3	1	-	-
Bandera	410111	-	-	-	6	-	-	4
Bangs	611447	-	-	-	34	20	-	83
Bardwell	610038	-	-	-	-	-	-	4
Bartlett	410115	-	-	-	-	-	-	-
Bedford	610042	-	1,419	5	73	3	13	27
Bellevue	610043	-	-	-	-	-	-	-
Bellmead	962845	-	729	21	9	1	-	2
Bells	610044	-	-	-	-	3	-	3
Belton	410950	-	3,264	305	22	2	-	25
Ben Wheeler	310076	-	-	-	-	1	-	1
Benbrook	611434	-	-	-	-	5	16	77
Benjamin	110880	-	-	-	-	-	-	-
Bertram	410132	-	-	-	3	1	-	2
Beverly Hills	962847	-	-	-	29	3	-	-
Blackwell	211081	-	-	-	-	2	-	1
Blooming Grove	310094	-	-	-	3	5	-	1
Blossom	310095	-	376	351	1	-	-	1
Blue Ridge	612167	-	-	200	1	-	-	-
Blum	610048	-	-	-	1	-	-	2
Bogata	310099	-	-	-	5	7	-	5
Bonham	310101	-	1,238	294	14	12	-	23
Bonham ML-01 (Jones Field)	310491	-	-	-	-	-	-	1
Bowie	610053	-	-	-	14	5	-	9
Boyd	610055	-	-	-	-	-	-	2
Bremond	410978	-	1,320	18	8	-	-	-
Bridgeport	610058	-	810	-	21	2	-	21
Bristol	610062	-	-	-	-	-	-	2
Bronte	211082	-	216	-	3	-	-	2
Brownsboro (Union Hill)	310048	-	-	-	-	-	-	1
Brownwood	611449	-	2,643	465	156	69	-	261
Bruceville-Eddy	610065	-	-	-	6	-	-	-
Brushy Creek	411255	-	-	-	-	1	-	1
Bryan	411071	-	4,771	6,984	94	18	-	330
Bryan ML-24 (Wixon Valley)	411319	-	-	-	-	-	-	3
Buckholts	410939	-	1	-	1	-	-	-
Buffalo	311779	-	8	-	2	-	-	1
Buffalo Gap	211083	-	14	-	1	-	-	3
Burkburnett	611451	-	3,947	139	144	74	-	234
Burleson	610071	-	-	832	5	6	1	146
Burnet	410161	-	2,216	86	19	3	-	8
Byers	611455	-	189	-	8	4	-	5

Distribution Facilities Replacement Completion Report (2016)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	
Caddo Mills	310124	-	476	-	5	-	-	14
Caldwell	411076	-	222	7	11	1	-	13
Calvert	411041	-	-	-	4	-	-	1
Cameron	410940	-	64	-	100	34	-	58
Campbell	310125	-	-	-	1	-	-	-
Canton	310127	-	-	-	2	-	-	2
Carlsbad	211085	-	-	-	2	-	-	2
Carrollton	610077	-	5	892	220	11	-	434
Cayuga	311480	-	-	-	1	-	-	-
Cedar Hill	610084	-	-	-	48	4	-	6
Cedar Park	411284	-	-	610	-	1	-	261
Celeste	310139	-	-	-	2	1	-	3
Cellina	610089	-	1,880	61	8	8	-	118
Center Point	410186	-	162	-	4	-	-	2
Centerville	310141	-	-	-	1	-	-	2
Chandler	310145	-	-	-	1	1	-	1
Chapel Hill	310968	-	-	-	1	2	-	-
Chico	610098	-	43	-	-	2	-	-
Childress	110099	-	1,409	6	146	37	-	135
Chillicothe	111024	-	13	-	-	1	-	2
Chilton	410979	-	32	-	1	-	-	-
Cisco	611460	-	5,471	111	26	8	-	19
Clarksville	310161	-	1,095	138	14	8	-	10
Cleburne	610103	3,849	1,548	270	97	93	-	179
Clifton	610107	-	705	-	9	2	-	1
Clyde	611461	-	315	-	24	1	-	14
Clyde (DRS6624)	611461	-	-	-	-	-	-	2
Cockrell Hill	610134	4,059	-	-	93	-	-	90
Coleman	611465	-	2,482	87	14	11	-	11
College Station	411071	-	1,136	2,094	29	17	-	374
Colleyville	610113	-	390	11	10	1	3	103
Collinsville	610114	-	-	5	-	1	-	-
Colorado City	211089	-	400	-	18	1	-	8
Comanche	611466	-	1,524	-	18	-	-	12
Comfort	410209	-	8	-	2	-	-	2
Commerce	310168	-	135	-	13	11	-	11
Como	310171	-	-	-	-	1	-	-
Coolidge	610121	-	-	-	3	-	-	-
Cooper	310174	-	-	-	5	2	-	2
Coppell	610122	-	560	6,005	1	49	-	91
Copperas Cove	410945	-	1,077	26	14	-	-	4
Corinth	610125	-	-	-	-	-	-	17
Corsicana	310177	-	5,353	5,733	28	69	1	54
Crandall	310192	-	-	-	1	-	-	1
Crawford	610130	-	-	-	1	-	-	3
Cross Roads	611198	-	-	-	-	-	-	3
Crowley	611435	-	-	-	9	1	9	20
Cumby	310218	-	-	-	1	-	-	1
D9-7 D/T	630478	-	-	-	-	-	-	1
Dallas	610134	132,908	115,601	13,042	3,408	634	1	5,176
Dalworthington Gardens	611425	-	-	-	-	-	-	4
Dawson	311780	-	2,824	239	20	6	-	8
De Leon	611468	-	255	-	3	1	-	2
Decatur	610150	-	6	-	10	2	-	12
Denison	610153	-	944	-	7	10	-	70
Denison Grayson Co IP	610153	-	-	-	-	-	-	2
Denison ML-05	610159	-	-	-	-	-	-	4
Denison ML-06	610160	-	-	-	-	-	-	1
Denton	610462	-	5,163	1,765	24	104	-	236
Deport	310239	-	-	-	1	1	-	1
DeSoto	610148	-	-	-	11	3	-	41
Detroit	310241	-	-	-	2	-	-	-
Dodd City	310248	-	-	-	-	-	-	1
Dublin	611470	-	610	-	7	2	-	1
Duncanville	610180	-	8	5	11	2	-	21
Early	611471	-	-	-	3	-	-	8
Eastland	612219	-	-	-	6	-	-	1
Ector	310280	-	2,211	398	5	2	-	12
Edgecliff Village	611436	-	-	-	-	3	29	90
Electra	611474	-	14	-	22	11	-	4

Distribution Facilities Replacement Completion Report (2016)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	
Elm Mott	610189	-	-	-	1	-	-	1
Elmo	310290	-	-	-	-	-	-	-
Emhouse	310293	-	-	-	-	1	-	-
Emory	310294	-	-	-	3	-	-	2
Ennis	610191	-	-	4	18	5	-	26
Eules	610200	-	46	-	58	9	-	115
Eustace	310312	-	-	-	1	1	-	-
Evant	411118	-	-	-	-	-	-	1
Everman	612054	-	-	-	10	3	6	15
Fairfield	311900	-	1,860	-	22	10	-	72
Fairview	962834	-	-	5,277	2	6	-	6
Farmers Branch	610208	-	1,695	4,623	470	90	-	677
Farmersville	612203	12	2,099	616	3	6	-	11
Fate	610209	-	-	-	-	1	-	36
Ferris	610210	-	-	-	17	1	-	4
Flower Mound	610215	-	-	300	1	-	-	163
Forest Hill	612055	-	359	-	26	40	11	74
Forney	310325	-	704	504	-	2	-	39
Fort Gates	411037	-	-	-	-	-	-	2
Fort Worth	610226	58,418	123,822	19,788	2,340	883	286	2,850
Fort Worth (Alliance Area)	610226	-	-	-	-	-	-	7
Fort Worth ML-06	610226	-	-	-	-	-	-	9
Fort Worth-Chadwick Farms	610226	-	-	-	-	-	-	3
Fort Worth-Morningstar	610226	-	-	-	-	-	-	11
Fort Worth-Sendera	610226	-	-	-	-	-	-	30
Franklin	411043	-	657	-	5	1	-	7
Frankston	310329	-	-	-	-	1	-	-
Fredericksburg	410285	-	27	-	58	1	-	43
Frisco	610233	-	8	847	4	1	-	65
Frost	310335	-	43	-	1	1	-	-
Gainesville	610237	2,146	2,718	683	41	8	-	65
Gainesville ML-03	610241	-	-	-	-	-	-	3
Garland	610244	-	4,021	591	1,349	91	-	1,340
Gatesville	411038	-	6,869	2,020	27	4	-	16
Georgetown	411289	-	10,800	2,332	50	1	-	322
Glen Rose	610256	-	-	-	-	1	-	-
Glenn Heights	610180	-	-	-	1	1	-	18
Godley	610259	-	-	-	6	-	-	-
Goldthwaite	611995	-	115	-	9	-	-	13
Goodlow	310503	-	-	-	-	-	-	-
Gorman	611478	-	-	-	-	-	-	3
Granbury	610263	-	728	-	6	4	-	7
Grand Prairie	610265	-	3,531	372	179	121	2	729
Grandview	610266	-	12,908	279	9	6	-	25
Granger	410309	-	424	-	11	3	-	-
Grapevine	610267	-	2,048	1,336	16	39	1	92
Greenville	310388	-	11,904	6,958	38	17	-	126
Groesbeck	612001	-	10	-	27	-	-	19
Gustine	611479	-	-	-	2	-	-	1
Haltom City	612026	-	-	2,672	39	20	12	90
Hamilton	411119	-	740	-	28	4	-	10
Hamiln	211099	-	-	-	2	1	-	3
Harker Heights	411047	-	2,727	904	-	5	-	4
Haskell	110884	-	268	-	8	1	-	3
Haslet	610282	-	99	-	-	-	-	-
Hawley	211100	-	-	-	-	-	-	1
Hearne	411044	-	3,982	-	115	3	-	74
Heath	610283	-	333	446	1	2	-	9
Henrietta	611482	-	-	-	1	1	-	3
Hewitt	962848	-	-	-	-	-	-	1
Hickory Creek	610336	-	-	116	-	1	-	49
Hico	611999	-	3,754	-	27	-	-	3
Highland Park	612100	15,312	-	-	232	14	-	290
Highland Village	610352	-	5	-	-	-	-	29
Hillsboro	610288	-	6,189	446	36	14	-	47
Holland	410339	-	6	-	2	-	-	-
Holliday	611483	-	363	-	-	3	-	-
Honey Grove	310440	-	-	-	13	10	-	2

Distribution Facilities Replacement Completion Report (2016)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Howe	610292	730	18,930	3	2	-	-	3
Hubbard	610293	-	314	-	11	1	1	1
Hurst	610297	-	6,145	-	452	3	2	477
Hutchins	610298	-	-	20	5	1	-	6
Hutto	411280	-	-	-	3	-	-	262
Iowa Park	611484	-	5,188	98	12	3	-	21
Jredell	611557	-	609	100	1	1	-	-
Irving	610304	-	8,681	699	36	70	-	604
Italy	610308	-	-	-	13	2	-	10
Itasca	610309	-	-	-	3	1	-	1
Jewett	311781	-	-	-	-	-	-	1
Josephine	612205	-	-	5	-	-	-	-
Joshua	610315	-	-	5	1	-	-	3
Justin	610321	-	734	1,238	1	1	1	5
Kamay	611489	-	-	-	-	-	-	1
Kaufman	310501	-	184	-	12	1	-	5
KC (WEST) HP	632644	-	-	-	-	-	-	2
Koene	610323	-	-	-	1	-	-	1
Keller	610324	-	-	10	4	2	-	119
Kemp	310502	-	117	-	2	-	-	-
Kennedale	612056	-	-	24	-	2	-	13
Kerens	310503	-	-	-	2	3	-	4
Kerrville	410360	-	304	70	34	4	-	35
Killeen	411048	-	3,847	145	6	4	-	5
Knox City	110885	-	235	-	4	-	-	2
Kosse	610332	-	-	-	2	-	-	2
Krum	610333	-	-	-	1	-	-	3
Kurten Mt.	411079	-	-	-	-	-	-	1
L1	632481	-	-	-	-	-	-	1
Lacy Lakeview	962850	-	2,263	-	-	3	-	1
Ladonia	310530	-	232	-	-	2	-	1
Lake Dallas	610336	-	1,520	1,385	1	20	-	23
Lake Worth	612669	-	606	-	21	7	-	11
Lakeport	311484	-	-	-	2	1	-	-
Lakeside	612668	-	-	-	-	-	1	2
Lampasas	411611	-	111	-	24	4	-	107
Lancaster	610341	-	-	5,627	9	4	-	14
Lavon	610347	-	-	-	-	-	-	2
Lawin	211108	-	-	-	10	-	-	6
Leander	411294	-	-	-	-	-	-	741
Leona	311916	-	-	-	1	-	-	-
Leonard	310546	-	-	-	-	-	-	3
Lewisville	610350	-	27	5	2	4	-	188
Lexington	410400	-	-	-	5	-	-	4
Liberty Hill	310392	-	-	-	-	-	-	7
Lillian	610358	-	-	-	1	-	-	-
Lindsay	610360	-	-	-	2	-	-	1
Lindsay MI-02	610361	-	-	-	-	-	-	2
Lipan	611491	-	240	-	-	-	-	3
Little Elm	610946	-	-	110	-	2	-	2
Little River-Academy	410954	-	-	-	1	1	-	1
Llano	410488	-	-	-	4	3	-	4
Lometa	410948	-	12	-	5	-	-	1
Longview	310882	-	6,354	-	32	11	-	30
Loraline	211109	-	-	2,150	-	-	-	-
Lorena	610955	-	-	-	1	1	-	-
Lott	410981	-	113	-	1	2	-	-
Lueders	211110	-	-	-	6	-	-	1
Mabank	310903	-	-	5	1	1	-	-
Madisonville	311631	-	1,277	-	22	2	-	13
Malakoff	310904	-	-	-	7	-	-	4
Malone	610963	-	1,773	309	5	5	-	13
Manor	410510	-	-	-	-	1	-	32
Mansfield	610964	-	775	411	1	19	-	142
Marble Falls	410512	-	170	353	10	5	-	8
Marlin	410982	-	6,096	1,520	62	6	-	49
Mart	610965	-	5,107	1,119	33	26	-	55
May	611500	-	-	-	30	-	-	-

Distribution Facilities Replacement Completion Report (2016)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Maypearl	610966	-	5	-	5	1	-	1
McGregor	610967	-	15,532	213	36	18	-	28
McKinney	610969	-	5,036	1,063	14	41	-	577
McKinney (Trinity Falls) HP	610969	-	-	-	-	-	-	110
McKinney ML-04	612541	-	-	-	-	-	-	74
McLendon-Chisholm	611090	-	-	-	-	-	-	22
Melissa	610975	-	-	220	2	-	-	104
Meridian	610976	-	-	-	4	-	-	2
Merkel	211113	-	149	-	27	3	-	-
Mesquite	610980	-	3,739	485	182	36	1	239
Mexia	610983	-	141	-	40	4	-	72
Midlothian	610984	-	-	-	1	-	-	9
Miles	211114	-	-	-	-	1	-	1
Millford	610986	-	2,413	659	21	8	-	26
Montague	610993	-	-	-	3	1	-	4
Moody	610995	-	2,767	5	42	5	-	-
Moran	611502	-	140	-	3	-	-	1
Morgan	610996	-	-	-	-	1	-	-
Muenster	610998	-	707	10	2	-	-	7
Munday	110894	-	55	-	3	-	-	2
Murchison	310947	-	-	-	-	-	-	1
Murphy	610999	-	-	-	-	1	-	15
Myra	611000	-	11,373	108	-	2	-	3
Nevada	612207	-	-	-	-	1	-	1
Newark	611004	-	-	-	2	-	-	-
Newcastle	611503	-	30	-	1	-	-	-
Nocona	611016	-	1,806	-	7	5	-	14
Nolanville	411050	-	-	-	-	-	-	5
Normangee	311633	-	-	-	-	-	-	-
North Richland Hills	612028	-	201	2,655	-	17	46	181
North Zulch	311634	-	431	-	1	3	-	3
Northlake	612545	-	-	-	-	-	-	282
Novice	611504	-	-	-	3	-	-	3
Oak Point	611198	-	-	-	-	-	-	81
Oakwood	310999	-	-	-	1	2	-	2
Olden	611510	-	1,069	-	3	2	-	4
Olney	611511	-	4,517	367	24	13	-	28
Ovalo	211120	-	-	-	-	-	-	1
Palestine	311008	-	704	74	10	-	-	8
Palmer	611040	-	-	-	-	-	-	1
Pantego	611426	-	-	-	-	-	-	7
Paris	311017	616	2,482	1,297	20	62	-	39
Paris-Reno Line E	311025	-	-	-	-	-	-	11
Parker	610999	-	-	-	-	-	-	15
Petrolia	611515	-	-	-	4	4	-	3
Petty	311041	-	-	-	1	-	-	1
Pflugerville	411296	-	-	78	3	-	-	583
Pilot Point	611052	-	-	-	1	1	-	4
Plano	611054	-	525	2,075	23	40	-	177
Point	311079	-	-	-	-	-	-	1
Ponder	611057	-	-	-	-	-	-	-
Pottsboro	611061	-	550	-	4	1	-	15
Princeton	611064	-	2,460	950	23	4	-	126
Prosper	611070	-	1,381	1,661	12	1	-	247
Prosper ML-01	611070	-	-	-	-	-	-	1
Quanah	110900	-	1,896	20	35	20	-	15
Quinlan	311096	-	-	-	-	-	-	1
Quitman	311097	-	643	85	3	1	-	9
Ranger	611517	-	1,213	151	-	3	-	3
Ravenna ML	311144	-	-	-	-	-	-	1
Reagan	410976	-	-	-	4	-	-	-
Red Oak	611072	-	-	5	1	2	-	7
Rendon	611435	-	-	-	-	-	-	2
Reno (Live Oak Tap)	610949	-	33,169	66	7	4	-	-
Retreat	311157	-	-	-	-	-	-	-
RFB HP	963148	-	-	-	-	-	-	1
Rhome	611082	-	-	-	1	-	-	1
Rice	611959	-	-	-	-	-	-	1

Distribution Facilities Replacement Completion Report (2016)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	
Richardson	611083	-	5,153	14,010	8	174	-	206
Richland	311159	-	-	-	-	1	-	1
Richland Hills	612027	-	-	-	-	2	2	8
Riesel	611085	-	-	-	-	2	-	10
Rio Vista	611086	-	-	-	2	-	-	-
River Oaks	612670	-	-	-	-	5	-	16
Roanoke	611089	-	-	-	2	-	-	86
Robert Lee	211123	-	-	-	1	-	-	-
Robinson	962853	-	-	-	7	-	-	9
Roby	211125	-	-	-	-	-	-	3
Rochester	110904	-	-	-	-	1	-	1
Rockdale	410626	-	118	-	7	-	-	4
Rockwall	611090	-	-	124	1	8	-	42
Rogers	410942	-	-	-	1	2	-	2
Roscoe	211127	-	284	-	3	-	-	5
Rosebud	410943	-	48	-	9	1	-	3
Rotan	211128	-	498	-	1	-	-	1
Round Rock	410633	-	-	98	6	2	-	951
Rowena	211129	-	132	-	-	1	-	1
Rowlett	611105	-	-	27	1	16	-	39
Roxton	311171	-	-	-	4	2	-	4
Royse City	611114	-	148	389	-	3	-	4
Rule	110905	-	20	-	2	-	-	-
Runaway Bay	611117	-	-	-	-	-	-	1
S2G	331459	-	-	-	-	-	-	1
Sabine	310552	-	-	-	-	-	-	1
Sachse	611119	-	-	-	1	-	-	40
Sadler	611120	-	-	-	-	1	-	-
Saginaw	611121	-	-	3,735	2	-	3	9
Saint Jo	611122	-	-	-	11	-	-	-
San Angelo	211132	-	22,743	3,746	271	84	-	167
San Saba	611996	-	547	-	288	6	-	55
Sanger	611125	-	-	-	3	-	-	12
Sansom Park	612671	-	-	-	-	-	-	2
Santa Anna	611521	-	-	-	28	-	-	3
Savoy	611126	-	-	-	1	-	-	3
Scurry	311197	-	14,583	-	10	-	-	-
Seagoville	611387	-	-	-	38	5	-	5
Seymour	611523	-	79	-	19	2	-	12
Shady Shores	611132	-	-	-	-	-	-	2
Sherman	611136	-	7,132	1,671	8	17	-	87
Sherman (DRS08)	611136	-	-	-	-	-	-	1
Snyder	211139	-	200	40	3	2	-	11
Snyder (Cogdell Tap)	211088	-	-	-	-	-	-	2
Somerville	411080	-	-	-	1	-	-	1
South Mountain	411040	-	-	-	-	-	-	1
Southlake	611162	-	66	128	7	7	-	127
Southmayd	611163	-	5	6,484	-	-	-	-
Springtown	611165	-	-	-	3	2	-	2
Stamford	211478	-	-	-	6	1	-	4
Star Harbor	311228	-	-	5	-	72	-	-
Stephenville	611556	-	2,119	1,953	8	4	-	13
Strawn	611526	-	-	-	1	-	-	-
Streetman	311901	-	1,239	-	1	-	-	-
Sulphur Springs	311237	-	2,318	1,146	28	4	-	18
Sunnyvale	611388	-	-	-	-	-	-	9
Sunset	611183	-	-	-	1	-	-	1
Sweetwater	211142	-	1,162	16	26	2	-	17
Talpa	612020	-	1,548	417	2	-	-	-
Taylor	410708	-	1,275	45	66	68	-	10
Teague	311902	-	15	-	56	35	-	45
Tehuacana	611188	-	10	-	-	-	-	-
Temple	410955	355	2,325	422	56	19	-	40
Terrell	311258	-	4,852	139	26	11	-	16
The Colony	610116	-	-	-	-	1	-	60
Thorndale	410777	-	-	-	3	1	-	1
Thornton	611366	-	-	-	2	1	-	2
Thrall	410780	-	-	-	-	-	-	-
Throckmorton	611529	-	2,571	6	11	1	-	6

Distribution Facilities Replacement Completion Report (2016)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Tioga	611194	-	-	-	-	1	-	-
Tom Bean	611195	-	-	-	1	-	-	2
Trent	211148	-	-	-	2	-	-	-
Trenton	311310	-	-	-	-	-	-	2
Trophy Club	612301	-	-	-	-	-	-	57
Troy	410975	-	-	-	1	-	-	-
Tuscola	211150	-	-	-	5	1	-	1
Tye	211152	-	603	-	-	-	-	9
Tyler	310041	-	-	-	-	1	-	-
Tyler ML-40	311869	-	-	-	-	-	-	1
University Park	612099	3,020	-	-	49	41	1	139
Valley Mills	611211	-	-	-	5	2	-	3
Valley View-Cooke	611212	-	9	-	2	-	-	-
Van Alstyne	611213	-	-	-	-	1	-	40
Venus	611214	-	-	-	1	-	-	-
Vernon	611532	-	347	-	-	6	-	12
Waco	611218	51,888	22,080	4,517	660	99	-	1,245
Waco (Industrial Loop) HP	962859	-	-	-	-	-	-	1
Waco ML-15	962856	-	-	-	-	-	-	1
Walnut Springs	611228	-	-	-	1	-	-	-
Watauga	611229	-	-	12	-	2	12	19
Waxahachie	611230	-	6,421	290	126	45	-	165
Weinert	110910	-	-	-	3	-	-	2
West	611240	-	6,140	728	30	12	-	8
Westlake	611243	-	-	-	-	-	-	6
Westminster	611244	-	-	-	-	-	-	2
Westover Hills	610226	-	536	564	-	6	4	12
Westworth Village	612672	-	690	-	-	-	-	3
White Settlement	612673	-	6	-	-	-	3	9
Whitehouse	311383	-	-	-	-	6	-	10
Whitesboro	611248	-	-	-	-	-	-	11
Whitewright	611251	-	-	-	1	1	-	4
Whitney	611252	-	-	-	8	-	-	3
Wichita Falls	611539	-	15,950	2,866	516	227	-	648
Willmer	611264	-	-	-	26	1	-	1
Winters	211160	-	30	-	6	3	-	-
Wolfe City	311402	-	-	-	1	3	-	1
Woodway	962861	-	-	-	34	-	-	8
Wortham	611271	-	274	-	-	-	-	6
Wylie	611273	-	4,844	-	1	-	-	26
Summary		274,515	718,270	170,218	15,253	4,639	478	29,015

Distribution Facilities Replacement Reporting

Atmos Energy Mid-Tex Division

Work Plan (2016)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	448,800	11,129	-
Cast Iron	237,600	-	-
Copper	-	500	-
Plastic	132,000	4,141	-
Misc.	-	-	20,982
Grand Total	818,400	15,769	20,982

Completion Report (2016)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	718,270	15,253	-
Cast Iron	274,515	-	-
Copper	-	478	-
Plastic	170,218	4,639	-
Misc	-	-	29,015
Grand Total	1,163,003	20,370	29,015

Work Plan (2017)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	634,000	11,000	-
Cast Iron	396,000	-	-
Plastic	123,000	3,000	-
Misc	-	-	26,000
Grand Total	1,153,000	14,000	26,000



March 15, 2018

Ms. Kari French
Director, Oversight and Safety Division
Railroad Commission of Texas

Ms. French:

Please find attached for your review and approval the Atmos Energy Mid-Tex Division's Distribution Facilities Replacement Completion Report and Distribution Facilities Replacement Work Plan pursuant to the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule.

During the calendar year ending December 31, 2017, the Atmos Energy Mid-Tex Division replaced facilities based on an assessment of existing, known risk and in response to changing conditions that created risk as they presented themselves during the year (i.e. occurrence of leaks, newly identified threats, etc.). In total, the Mid-Tex Division replaced approximately 655,819 feet of steel main, 417,736 feet of cast iron main, 186,059 feet of plastic main, and 21,699 service lines. The Distribution Facilities Replacement Completion Report detailing the distribution facilities replaced by the Mid-Tex Division during the calendar year ending December 31, 2017 is included as an enclosure to this correspondence.

During the calendar year ending December 31, 2018, the Atmos Energy Mid-Tex Division will continue to replace facilities based on an assessment of existing, known risk and in response to changing conditions that create risk as they present themselves during the year. In total, the Mid-Tex Division plans to replace approximately 750,000 feet of steel main, 424,000 feet of cast iron main, 200,000 feet of plastic main, and 23,000 service lines. The Distribution Facilities Replacement Work Plan outlining the facilities proposed for replacement by the Mid-Tex Division during the calendar year ending December 31, 2018 is included as an enclosure to this correspondence.

Atmos Energy recognizes that risk characterized in the Work Plan is defined by 'known' conditions that exist within facilities in the distribution system at the time the risk assessment is performed and the Work Plan is established. A risk model cannot quantify unknown, undiscovered or unranked risk. Atmos Energy will take into account these 'unknown' conditions in any given year as they present themselves and may retire or replace facilities in order to mitigate these risks.

We appreciate the opportunity to update the Railroad Commission on work completed in 2017 and your consideration of our replacement plans for 2018. We look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Marlo A. Sutton".

Marlo Sutton
Director, Compliance, Mid-Tex

Enclosures (2)

Distribution Facilities Replacement Reporting

Atmos Energy Mid-Tex Division

Work Plan (2017)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	634,000	11,000	-
Cast Iron	396,000	-	-
Plastic	123,000	3,000	-
Misc	-	-	26,000
Grand Total	1,153,000	14,000	26,000

Completion Report (2017)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	655,819	15,057	-
Cast Iron	417,736	-	-
Copper	-	488	-
Plastic	186,059	6,154	-
Misc	-	-	39,604
Grand Total	1,259,614	21,699	39,604

Work Plan (2018)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	750,000	17,000	-
Cast Iron	424,000	-	-
Plastic	200,000	6,000	-
Misc	-	-	36,000
Grand Total	1,374,000	23,000	36,000

Distribution Facilities Replacement Completion Report (2017)
 Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
A27	131059							1
Abbott	610001				1			
Ablene	211069	684	34550	2229	183	292		590
Addison	610005			1300	7	14		4
Alba	310012							1
Albany	611443		2996	539	33	21		55
Allen	610007		944	369	11	14		422
Alma	610009			2281		1		4
Alvarado	610012				2	1		3
Alvord	610013		2079	745	14			17
Anna	610018		320			3		290
Anson	211075		360		2	2		2
Archer City	611445				6	2		2
Argyle	610021		110			1		36
Arlington	610023		6933	11759	582	673	3	1936
Athens	310028		1625	77	19	1		24
ATHENS NATL GAS (Dist)	310198							2
Aubrey	610031			194				2
Aurora	611082							3
Austin	411519							330
Austin (MS8854)	411281							1
Avalon	610033			2791		21	1	10
Avery	310056				1	0		
Avoca	211077		788					
Azle	610036		94		5	3		11
Baird	611446		65		6			1
Balch Springs	611383		910		153	0		15
Ballinger	211078		10108	3904	31	19		85
Bandera	410111				2			2
Bangs	611447				20	0		4
Bardwell	610038				1			
Bartlett	410115				3			1
Bedford	610042		380	46	9	86		598
Bellmead	962845		723	0	2			
Bells	610044					1		4
Bellton	410950		1495	6	16	3		5
Ben Wheeler	310076							1
Benbrook	611434		424	8	7	29	5	82
Benjamin	110880		270					2
Bertram	410132		469	2008	3	6		13
Beverly Hills	962847		5		35			
Blanket	611448		482		2			2
Blossom	310095				1			1
Blue Mound	612123				1			2
Blum	610048				1			1
Bogata	310099				1	1		1
Bonham	310101		680	437	29	2		32
Bowie	610053		230		12	1		12
Boyd	610055		280		1			4
Brashear	310103				1			
Bremond	410978		0		0	1		
Bridgeport	610058		677	196	13	2		17
Bronte	211082				5			1
Brownwood	611449		2732	20	10	16		28
Bruceville-Eddy	610065		59		1	1		2
Brushy Creek	411255							1
Bryan	411071		7796	63	129	41		437
Buckholts	410939		2		2			1
Buffalo	311779				1			
Burkburnett	611451		1553	18	19	5		41
Burleson	610071		240	429	4	2		132
Burnet	410161			56	108	29		125
Byers	611455				15			2
Caddo Mills	310124				0			
Caldwell	411076		200	322	6			17
Calvert	411041		1127		9	5		13
Cameron	410940		72		27	1		7
Campbell	310125			5				
Canton	310127		722	14	2	3		9
Carbon	611458							1
Carey	110092					3		6
Carlsbad	211085		1252		1			1
Carrollton	610077		2288	429	34	209		422
Cayuga	311480							1
Cedar Hill	610084				22	2		20
Cedar Park	411284			546		0		158
Celeste	310139				1			

Distribution Facilities Replacement Completion Report (2017)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Celina	610089		1430	193	1	12		305
Center Point	410186				1			1
Centerville	310143		390	37	6			9
Chandler	310145		834	61	1	2		6
Chapel Hill	310968				1	1		2
Chico	610098				1			1
Childress	110099		1497		25	10		12
Chillicothe	111024							1
Chilton	410979		975	6	3	4		1
Cisco	611460	464	1610		15	1		3
Clarksville	310161		9		2	0		2
Cleburne	610103		1992	132	77	104		37
Clifton	610107		5059		27	5		10
Clyde	611461		201		4	1		5
Cockrell Hill	610134		933			20		22
Coleman	611465		0			0		7
College Station	411071		837	804	33	7		356
Colleyville	610113			838	1	7		122
Collinsville	610114							1
Colorado City	211089		150		6	2		4
Comanche	611466		3097	57	8	15		18
Comfort	410209				3	2		7
Commerce	310168		2276	2	10	1		4
Cooks Point ML-02	411078							1
Coolidge	610121				0			
Cooper	310174				1	1		1
Coppell	610122				10			79
Copperas Cove	410945				3			2
Corinth	610125							78
Corsicana	310177		14822	3592	19	37		166
Corsicana ML-05	310178							2
Covington	610129				1			
Crandall	310192		201					2
Crawford	610130							2
Cross Roads	611198					1		7
Crowley	611435		2			1		5
Dallas	610134	219906	61935	2200	2776	165	8	4728
Dalworthington Gardens	611425							1
Dawson	311780		2743	50	26	5		29
De Leon	611468	500	717	235	6	1		4
Decatur	610150		530		9	2		12
Denison	610153		1774	204	20	5		76
Denison (Saddle Creek)	610153							14
Denison Grayson Co IP	610268							4
Denison ML-05	610159							1
Benton	610162		22114	6563	69	168		448
Deport	310239			26	0			
DeSoto	610148				9	3		67
Dodd City	310248				1			1
Dublin	611470							
Duncanville	610180				330	3		386
E10-2 HP	632426							2
Early	611471		2217	671		1		5
Eastland	612219		4262	863	44	4		23
Ector	310280		0		1	0		1
Edgecliff Village	611436		233	6350	2	14	5	204
Electra	611474		258		20	0		3
Elm Mott	610189				4			5
Elmo	310290			5				
Emhouse	310293					1		4
Emory	310294		1121		4	1		5
Ennis	610191		3668	2246	13	12		30
Euless	610200				98	0		154
Eustace	310312				0			1
Evant	411118				1			1
Everman	612054				34	2	1	33
Fairfield	311900		338		13	7		22
Fairview	982834							43
Farmers Branch	610208		84	2993	490	77		555
Farmersville	612203		7		3			4
Fate	610209				2			104
Ferris	610210			471	14	1		11
Flower Mound	610215		120	631				160
Forest Hill	612055			15		2	1	8
Fortney	310325		1593	713	7	8		291
Forreston	610216				1			1
Fort Gates	411037							1

Distribution Facilities Replacement Completion Report (2017)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Fort Worth	610226	135473	113904	18160	3350	777	441	6394
Fort Worth (Alliance Area)	612545							15
Fort Worth-Chadwick Farms	610226							1
Fort Worth-Sendera	610226							153
Franklin	411043		2522	12	4	3		24
Frankston	310329							2
Fredericksburg	410285		0		39	1		59
Fredericksburg (MS6036)	411528							10
Frisco	610233			936	1	1		178
Frisco ML-02	610233							1
Frost	310335		1709		4	6		1
G & Moss Lake System	610242							2
Gainesville	610237		1479	379	1	6		22
Gainesville ML-03	610241							5
Garland	610244		13700	5748	1436	668	1	2102
Gatesville	411038		2367	546	19	0		10
Georgetown	411289				41	2		195
Glen Rose	610256		473	58	2	1		2
Glenn Heights	610180					1		5
Godley	610259				0			
Goldthwaite	611995			5	6			3
Gorman	611478							1
Granbury	610263		480	109	6			7
Grand Prairie	610265		13226	493	194	220	2	706
Grandview	610266				2			1
Granger	410309		0		17	1		3
Grapevine	610267		4317	3018	39	21		135
Greenville	310388			5	10	3		17
Greenville ML-11	310390							1
Groesbeck	612001				4			82
Gunter	610274		1802	23	6	3		16
Gustine	611479				4			6
Hagansport R/W	310404							1
Haltom City	612026		1015	2	3	22	5	42
Hannilton	411119		222		49	1		1
Hamlin	211099		2		2			1
Harker Heights	411047					0		3
Haskeil	110884				15			2
Haslet	610282		23					3
Hearne	411044		0		40	2		15
Heath	610283			188		0		131
Henrietta	611482		626	260	9	4		14
Hewitt	962848							1
Hickory Creek	610336					10		67
Hico	611999		1239	5	5			
Highland Park	612100	11015		11	184	2		280
Highland Village	610352				1	2		22
Hillsboro	610288		2814	518	22	6		11
Holland	410339				2			
Holliday	611483		4404	1905	34	36		63
Honey Grove	310440				14			1
Howe	610292				3			11
Hubbard	610293				12			
Hurst	610297		7	5	123	373		193
Hutchins	610298				3			3
Hutto	411280		151	40	12			188
Iowa Park	611484		1930	444	1	11		44
Irving	610304		6042	319	29	25		253
Italy	610308				6			3
Itasca	610309		65	9	12			4
Josephine	612205			0		3		4
Joshua	610315				1			2
Justin	610321							4
Kaufman	310501		94	675	11	11		18
KC (West) HP	963146							1
Keene	610323				4			1
Keller	610324				1	1		112
Kemp	310502				5			1
Kennedale	612056		1			2		47
Kerens	310503		6950	2365	3	16		47
Kerrville	410360		2212	33	105	11		113
Killeen	411048		1045	5	178	18		61
Kirkland	110273		7	4389				2
Knox City	110885		431	4	3			2
Kosse	610332				1			1
Krum	610333				3			6
Lacy Lakeview	962850		2610	128	2	10		16

Distribution Facilities Replacement Completion Report (2017)
 Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Ladonia	310530					1		1
Lake Dallas	610336				1	1		10
Lake Worth	612669							5
Lakeport	311484				1	1		2
Lakeside	612668					1		6
Lampasas	411611		292		21	1		25
Lampasas ML-02 (Horseshoe Add)	411610							1
Lancaster	610341		800	2440	10	3		20
Lavon	610347							1
Lawn	211108		48		2			2
Lawrence ML04	310539							1
Leander	411294			166				1007
Leona	311916				0			
Leonard	310546		510	95		1		12
Lewisville	610350		110	246	12	23		101
Lexington	410400				8			4
Liberty Hill	411294							1
Lillian	610358				1			
Lindsay	610360		725	8	1			2
Lindsay ML-02	610361							1
Lipan	611491		1220	23	1	1		5
Little Elm	610946			10				4
Little River-Academy	410954				5			4
Llano	410488		7		10			8
Lockett ML-10	611492							1
Lone Oak	310872							1
Longview	310882		3241		20	3		38
Loralna	211109					1		1
Lorena	610955				1			1
Lott	410981		12988		0			
Lueders	211110		528	100	11			3
M8	632467							1
Mabank	310903					1		2
Madisonville	311631		724		32	5		14
Malakoff	310904		378	25	8			1
Malone	610963		989	280	4	2		5
Manor	410510				1			40
Mansfield	610964			2016	4	27		382
Marble Falls	410512		1575	7	20	5		26
Marlin	410982		537		13	3		24
Mart	610965		425			1		3
May	611500		58		9			1
Maypearl	610966				4			2
McGregor	610967		7759	2929	61	69		174
McKinney	610969		718	1846	7	18		1147
McKinney (Trinity Falls)	610969							144
McKinney (Trinity Falls) HP	610969							39
McKinney ML-03 (Rosa Garden)	610971							1
McKinney ML-04	612541							79
McLendon-Chisholm	611090							74
Melissa	610975			40	2			1
Megargel	611501							246
Meridian	610976				4			2
Merkef	211113				14			2
Mesquite	610980		899	19	7	6		33
Mexia	610983		865		133	20	1	18
Midlothian	610984				7	1		57
Midway	311632				1			
Miles	211114					0		
Milford	610986		97		1			3
Montague	610993				1			1
Moody	610995				15			
Moran	611502		20					
Morgan	610996				2	1		
Muenster	610998		463	21	3			2
Munday	110894		907	2	1	1		
Murphy	610999							8
Newark	611004				2			1
Newcastle	611503				1			1
Nocona	611016		1131	0	2			10
Nolanville	411050							6
Normangee	311633				4	3		4
North Richland Hills	612028		117	279		5	7	227
North Richland Hills ML-01	610221							1
Northlake	612545							2
North Zulch	311634				5			247
Novice	611504				0			118

Distribution Facilities Replacement Completion Report (2017)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Oak Point	611198							
Oakwood	310999				0	0		2
Oglesby	611035		776		5			4
Olden	611510				2			
Olney	611511		3408	0	10	4		9
Osceola	611039							15
Ovilla	611072			11494		4		1
Palestine	311608		9374	383	17	3		26
Palmer	611040				1	2		11
Pantego	611426		2					17
Paradise	611043				1			2
Paris	311017	317	9475	965	62	9		26
Paris-Arthur City Line E16	311082							4
Paris-Reno Line E	964910							1
Parker	610999							23
Petrolia	611515			41	4	1		4
Petty	311041					1		
Pflugerville	411296			786				627
Pilot Point	611052			10	7			7
Plano	611054		2556	21123	13	362		574
Point	311079				2			2
Ponder	611057				1			1
Pottsboro	611061				2			9
Powell	311083				1			
Paynor	311086				1			1
Princeton	611064		218		1	2		26
Prosper	611070		8250		2			564
Quanah	110900		1818		32	6		13
Quinlan	311096			10	1	1		4
Quitman	311097		650	744	7	2		6
Ranger	611517		1232		9			6
Red Oak	611072				2	1		11
Rendon	611435		8					1
Retreat	311157					1		1
RFB HP	963148							1
Rhome	611082				0			1
Rice	611959				3	2		12
Richardson	611083		8994	4182	13	57		180
Richland	311159		20	105				1
Richland Hills	612027		6643	142	3	15	2	36
Riesel	611085					1		9
Rio Vista	611086				0			1
River Oaks	612670							15
Roanoke	611089		2487	617	12	3		108
Robert Lee	211123				1			1
Robinson	962853		729	989	12			10
Roby	211125		222					1
Rockdale	410626				10	1		5
Rockwall	611090		1155	3534	2	46		258
Rogers	410942				2			1
Roscoe	211127							1
Rosebud	410943		9		9	1		16
Ross	611104				1			
Rotan	211128		54		0			
Round Rock	410633			408	2			1314
Rowlett	611105			5	1	2		122
Roxton	311171		519	60	1			6
Royse City	611114		2120			28		38
Rule	110905				1			
Runaway Bay	611117				2		2	3
Sabine	310552			320				3
Sachse	611139							100
Sadler	611120							1
Saginaw	611121			320	72	175	1	339
Saint Jo	611122		370		6			
San Angelo	211132		41271	1535	201	195		421
San Saba	611996		61	5	12			12
Sanger	611125		440	2108	1	1		35
Sansom Park	612671							8
Santa Anna	611521				8			2
Santo	611522				1			1
Savoy	611126				0			
Seagoville	611387		2320	12	106	3		18
Seymour	611523				4			8
Shady Shores	611132			48	1			5
Sherman	611136		6032	2414	29	10		109
Sherman HP 100#	611136							1

Distribution Facilities Replacement Completion Report (2017)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Snyder	211139		2897	1	9	1		30
Southlake	611162		6	290	2	1		145
Southmayd	611163				1			2
Springtown	611165		1590	13	10	1		4
Stamford	211478		4107	443	15	1		2
Star Harbor	311228					0		1
Stephenville	611556		1560	275	10	7		8
Strawn	611526				2			
Streetman	311901				0			
Sulphur Springs	311237		5463	4234	39	26		153
Sunnyvale	611388							65
Sunset	611183				1			1
Sweetwater	211142				22	4		62
Taylor	410708		5459	29	413	109		30
Teague	311902		801		2	2		2
Temple	410955		769	58	378	19		384
Terrell	311258		812	843	1	26		9
The Colony	610116			2483		9		63
Thorndale	410777				5	4		5
Thornton	611366				3	1		5
Thruall	410780				2			3
Throckmorton	611529		717		5	2		5
Tioga	611194		3913	1756	10			33
Trent	211148				1			1
Trinidad	311315				1			1
Toco ML-26	311297							1
Tam Bean	611195							1
Trenton	311310							2
Trophy Club	612301							35
Troy	410975		8		1			2
Tuscola	211150		108		4			1
Tye	211152		152	4053		1		1
Tyler	310041		163	119		2		1
Tyler ML-11 (Old GE Plant)	310031							1
Tyler ML-40	311869							
University Park	612099	11250	3334		223	17		273
Valley Mills	611211		2580		21	11		22
Valley View-Cooke	611212		250					
Van Alstyne	611213		1593	406		1		6
Venus	611214				3			2
Vernon	611532		918			14		32
Waco	611218	38127	16956	2824	589	36	1	963
Walnut Springs	611228				0			
Watauga	611229			997		1		7
Waxahachie	611230		4552	651	36	24		171
Weinert	110910		2373		0			
Wells Branch	411519							4
West	611240		3917	273	4	11		16
Westlake	611243							23
Westover Hills	610226						1	
Westworth Village	612672		3742	33	21	42		42
White Settlement	612673		0	4	2	25		35
Whitehouse	311383			187	5	4		34
Whitesboro	611248		1150	50	4	5		12
Whitewright	611251					1		1
Whitney	611252				2			1
Wichita Falls	611539		12323	650	58	69		363
Wilmer	611264				26	4		5
Windom	311996				1			
Wingate	211159		6052	418	5	2		7
Winters	211160		134		5			1
Wolfe City	311402				3			2
Woodway	962861				32			1
Wortham	611271		4280	1008	17	14		44
Wylie	611273		20			1		141
Yantis	311408				1	1		2
Summary		417,736	655,819	186,059	15,057	6,154	488	39,604



July 2, 2018

Ms. Kari French
Director, Oversight & Safety Division
Railroad Commission of Texas
P.O. Box 12967
Austin, Texas 78711-2967

RECEIVED
R.R.C. OF TEXAS

JUL 02 2018

GAS SERVICES DIVISION
AUSTIN, TEXAS

Dear Ms. French:

Atmos Energy Corporation plans to further accelerate its pipe replacement efforts throughout its Mid-Tex Division as part of the company's ongoing commitment to safety by continuing to upgrade its natural gas distribution system in Texas.

This Supplement detailing those further acceleration plans follows the "Safety-Related Condition Report" that Atmos Energy submitted to the Railroad Commission on March 6, 2018, related to the abnormal, sudden, and unexplained leak activity in a defined geographic area in Northwest Dallas. As reported, in direct response to this leak activity, on March 1, 2018, Atmos Energy initiated a pipeline replacement project involving a planned outage of an area affecting approximately 2,800 residences and continued to closely monitor the area outside of the physical boundaries of the planned outage by conducting continuous leak surveys. These further accelerated pipeline replacement efforts will be in addition to those previously described in our March 15, 2018, letter pursuant to the requirements of the Railroad Commission's Distribution Facilities Replacement Rule under 16 TAC 8.209.

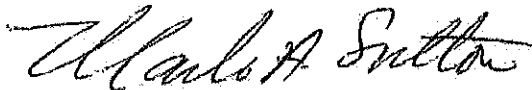
Ultimately, a number of factors will influence the rate at which further accelerated pipeline replacement may be accomplished. As we work towards these goals, the most-influential factors will be the availability of qualified construction crews to perform the work and their ability to scale as we further accelerate pipe replacement; however, it may also be influenced by the availability of materials; trained and qualified employees to design, coordinate, and inspect the level of construction activity; contractors and fill material to conduct street repairs; and city resources to support the increased level of activity. Keeping these factors in mind, we present this supplement to Atmos Energy Mid-Tex Division's Distribution Facilities Replacement Work Plan to the Railroad Commission for your review, comment, and approval.

As we know, and have seen in this instance, a risk model cannot quantify unknown, undiscovered, or unranked risk. As we have done here, we will continue to take into account any "unknown" conditions as they present themselves and may retire or replace facilities in order to mitigate these risks.

July 2, 2018
Ms. Kari French
Page 2

We appreciate the Railroad Commission's consideration of our replacement plans. We look forward to your response and welcome the opportunity to discuss these matters with you in the future.

Sincerely,

A handwritten signature in cursive script that reads "Marlo A. Sutton".

Marlo A. Sutton
Director, Regulatory & Compliance
Mid-Tex Division

Enclosure

Distribution Facilities Replacing Reporting
 Atmos Energy Mid-Tex Division
 Supplement - July 2, 2018

Work Plan (2018) - Submitted

Material	Distribution Piping		Service Lines	Components
	feet	miles	each	each
Steel	750,000	142	17,000	-
Cast Iron	424,000	80	-	-
Plastic	200,000	38	6,000	-
Misc	-	-	-	36,000
Grand Total	1,374,000	260	23,000	36,000

Work Plan (2018) - Supplement

Material	Distribution Piping		Service Lines	Components
	feet	miles	each	each
Steel	158,000	30	13,000	-
Cast Iron	10,000	2	-	-
Plastic	-	-	-	-
Misc	-	-	-	-
Grand Total	168,000	32	13,000	-

Work Plan (2018) - Total Including Supplement

Material	Distribution Piping		Service Lines	Components
	feet	miles	each	each
Steel	908,000	172	30,000	-
Cast Iron	434,000	82	-	-
Plastic	200,000	38	6,000	-
Misc	-	-	-	36,000
Grand Total	1,542,000	292	36,000	36,000

Distribution Facilities Replacing Reporting
Atmos Energy Mid-Tex Division
Supplement - July 2, 2018

Work Plan (2018) - Submitted

Material	Distribution Piping		Service Lines	Components
	feet	miles	each	each
Steel	750,000	142	17,000	-
Cast Iron	424,000	80	-	-
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Work Plan (2018) - Supplement

Material	Distribution Piping		Service Lines	Components
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Steel	158,000	30	13,000	-
Cast Iron	10,000	2	-	-
Plastic	-	-	-	-
Misc	-	-	-	-
Grand Total	168,000	32	13,000	-

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Misc	-	-	-	36,000
Grand Total	1,542,000	292	36,000	36,000



March 15, 2019

Ms. Kari French
Director, Oversight and Safety Division
Railroad Commission of Texas

Dear Ms. French:

Please find attached for your review and approval the Atmos Energy Mid-Tex Division's 2018 Distribution Facilities Replacement Completion Report and 2019 Distribution Facilities Replacement Work Plan pursuant to the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule. For reference, the attachment also includes the Company's 2018 Distribution Facilities Replacement Work Plan filed March 15, 2018 (supplemented July 2, 2018) as well as the Cumulative Completion Report for the years 2011-2018.

As shown in the 2018 Completion Report, Atmos Energy Mid-Tex Division's investment resulted in the replacement of approximately 172 miles of steel main, 74 miles of cast iron main, 44 miles of plastic main and 22,033 service lines. These totals vary from the estimates originally presented in the 2018 Work Plan because the actual numbers reflect any risks that were unknown, undiscovered or unranked at the time the Work Plan was developed and other factors that affect the order and completion of projects.

In total, Mid-Tex replaced 290 miles of main or 99% of main footage outlined in the July supplement. Specifically related to steel service lines, the supplemental plan included a significant number of steel service lines to be replaced during the cast iron and steel main replacements and so ramp up efforts were concentrated on main crews. Dedicated steel service line replacement crews were assembled later in the calendar year.

Ultimately, due to the Company's aggressive efforts to accelerate its pace, Atmos Energy Mid-Tex Division invested \$51.3 million (13%) more funds than originally anticipated in its 2018 Work Plan. The pipe replacement in the 2018 Completion Report reflects a 60% increase in spending compared to 2017. Atmos Energy ended calendar year 2018 with a 98% increase in dedicated crews working on pipe replacement activity setting the stage for an aggressive pace during 2019.

During the calendar year ending December 31, 2019, the Atmos Energy Mid-Tex Division will continue to replace facilities based on an assessment of existing, known risk and in response to changing conditions that create risk as they present themselves during the year. In total, the Mid-Tex Division plans to replace approximately 175 miles of steel main, 100 miles of cast iron main, 38 miles of plastic main and 35,000 service lines in

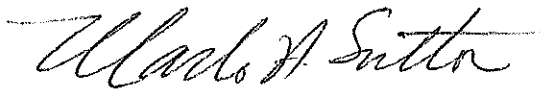
March 15, 2019
Ms. Kari French
Page 2

2019. The Mid-Tex Distribution Facilities Replacement Work Plan for calendar year ending December 31, 2019 is included as an enclosure to this correspondence. The 2019 Work Plan supports Atmos Energy's commitment to be free of all known cast iron by the end of calendar year 2021.

As we know, the risk characterized in the 2019 Work Plan is defined by known conditions that exist within facilities in the distribution system at the time the risk assessment is performed and the Work Plan is established, based on the risk model reviewed and approved by the Commission. The risk model cannot quantify unknown, undiscovered or unranked risk. We will continue to take into account any "unknown" conditions as they present themselves and may retire or replace facilities in order to mitigate these risks.

We appreciate the opportunity to update the Railroad Commission on work completed in 2018 and your consideration of our replacement plans for 2019. We look forward to your response.

Sincerely,



Marlo Sutton
Vice President – Technical Services, Mid-Tex

Enclosures

Distribution Facilities Replacement Reporting CY 2018
Atmos Energy Mid-Tex Division

Work Plan (2018)

Material	Distribution Piping (ft)	Distribution Piping (mi)	Service Lines (ea)	*Components (ea)
Steel	750,000	142	17,000	-
Cast Iron	424,000	80	-	-
Copper	-	-	-	-
Plastic	200,000	38	6,000	-
Misc	-	-	-	36,000
Grand Total	1,374,000	260	23,000	36,000

Work Plan Supplement (July 2, 2018)

Material	Distribution Piping (ft)	Distribution Piping (mi)	Service Lines (ea)	*Components (ea)
Steel	158,000	30	13,000	-
Cast Iron	10,000	2	-	-
Copper	-	-	-	-
Plastic	-	-	-	-
Misc	-	-	-	-
Grand Total	168,000	32	13,000	-

Work Plan as supplemented (2018)

Material	Distribution Piping (ft)	Distribution Piping (mi)	Service Lines (ea)	*Components (ea)
Steel	908,000	172	30,000	-
Cast Iron	434,000	82	-	-
Copper	-	-	-	-
Plastic	200,000	38	6,000	-
Misc	-	-	-	36,000
Grand Total	1,542,000	292	36,000	36,000

Completion Report (2018)

Material	Distribution Piping (ft)	Distribution Piping (mi)	Service Lines (ea)	*Components (ea)
Steel	910,705	172	16,390	-
Cast Iron	388,432	74	-	-
Copper	-	-	18	-
Plastic	229,691	44	5,625	-
Misc	-	-	-	24,702
Grand Total	1,528,828	290	22,033	24,702

Cumulative Completion Report (2011 - 2018)

Material	Distribution Piping (ft)	Distribution Piping (mi)	Service Lines (ea)	*Components (ea)
Steel	4,491,784	851	187,769	-
Cast Iron	2,129,862	403	-	-
Copper	-	-	1,110	-
Plastic	1,002,967	190	29,765	-
Misc	-	-	-	134,578
Grand Total	7,624,613	1,444	218,644	134,578

Work Plan (2019)

Material	Distribution Piping (ft)	Distribution Piping (mi)	Service Lines (ea)	*Components (ea)
Steel	924,000	175	30,000	-
Cast Iron	528,000	100	-	-
Plastic	200,640	38	5,000	-
Misc	-	-	-	23,000
Grand Total	1,652,640	313	35,000	23,000

*Note: While the number of components is estimated in the Work Plan and shown in the actuals, the amount reflected in the Work Plan is not a target but rather an estimate of how many components will be needed and is used for planning and budgeting purposes. The actual number of components replaced reflects only those needed for the projects completed.

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
A37-1	130973							1
A37-3-1-1 DIST	130925							1
Abbott	610001				3	0		2
Abilene	211069	585	17,259	3,078	64	260		272
Addison	610005				17	2		4
Alba	310012					0		
Albany	611443		11,235	6,971	82	70		118
Allen	610007		1,475	985	11	5		25
Alma	610009			10	6	9		1
Alvarado	610012		0		0	0		1
Alvord	610013				6	0		
Anna	610018		0		-1	0		2
Anttona	310023				1	0		
Anson	211075		692	16	4	9		8
Archer City	611445		0		2	1		
Argyle	610021		0	0		0		1
Arlington	610023		14,766	7,801	388	508		1,232
Athens	310028		6,059	300	28	5		46
Aubrey	610031			7,920	3	6		3
Austin	411519			120				
Avalon	610033		124	6,944		16		28
Avery	310056				1	0		
Avoca	211077					0		
Azle	610036		-792		3	3		5
Baird	611446		0		4	0		4
Balch Springs	611383	5,446	890	15	231	3		12
Ballinger	211078		17,802	4,463	75	53		131
Bandera	410111				5			2
Bangs	611447		0		7	0		1
Baradwell	610038		1,074			0		
Barry	310064					0		
Bartlett	410115				4			
Bedford	610042		-201	169	13	4		16
Bellmead	962845		360	4	11	6		9
Bells	610044					0		
Belton	410950			243	12	1		7
Ben Wheeler	310076					1		
Benbrook	611434					0	2	13
Benjamin	110880		0			0		
Bertram	410132		0	0	7	1		2
Beverly Hills	962847		200	334	30	0		
Blackwell	211081					0		
Blanket	611448					0		
Blooming Grove	310094		0			0		1
Blossom	310095				1	0		
Blue Mound	612123				1	1		3
Blue Ridge	612167		6		1	0		
Blum	610048					0		
Bogata	310099				2	0		
Bonham	310101		2,399	1,383	31	13		45
Bowle	610053		1,064	0	25	5		16

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Boyd	610055				2	0		
Brashear	310103				0	0		
Bremond	410978		0		2	0		1
Bridgeport	610058		1,847	188	24	7		8
Bronte	211082					0		
Brownsboro	310111					0		
Brownwood	611449		417	0	6	6		23
Bruceville-Eddy	610065		0		1			
Bryan	411071		2,962	120	94	57	1	135
Buckholts	410939		5		1			
Buffalo	311779		13		3	0		1
Buffalo Gap	211083				2	1		8
Burkburnett	611451		5,090	3,668	85	111		176
Burleson	610071		0	250	8	1		12
Burnet	410161		266	902	10	3		11
Byers	611455		9		10	0		1
Caddo Mills	310124				1	0		1
Caldwell	411076		1,364	0	7	16		22
Calvert	411041		790		8	2		6
Cameron	410940				185	37		46
Campbell	310125			0		0		
Canton	310127		1,809	271	6	8		12
Carlsbad	211085					0		
Carrollton	610077		28	67	15	137		261
Cayuga	311480					0		
Cedar Hill	610084			292	88	2		13
Cedar Park	411284			1,930				
Celeste	310139		0	0	1	0		1
Celina	610089		410			2		
Center Point	410186				4	1		2
Centerville	310141		0			0		1
Chandler	310145			1,680	2	2		6
Chapel Hill	310968					4		4
Chico	610098		949	8	4			2
Childress	110099		519		12	5		4
Chillicothe	111024		1,457	74	3	2		4
Chilton	410979		0		1	0		
Cisco	611460		3,281	10	22	5		2
Clarksville	310161			0	4	0		1
Cleburne	610103		2,176	47	54	12		34
Clifton	610107		5,463	143	38	17		40
Clyde	611461		163	0	10			16
Cockrell Hill	610134					7		20
Coleman	611465		7,144	2,038		11		20
College Station	411071		2,232	362	30	30		52
Colleyville	610113			13		2		10
Collinsville	610114					0		1
Colorado City	211089		788		13	0		3
Comanche	611466		542	5651	51	55		127

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Comfort	410209		5		1	0		1
Commerce	310168		670	40	8	7		7
Comg	310171		765	40		0		
Coolidge	610121		0		2	0		
Cooper	310174				4	0		
Coppell	610122		0	2,488	10	0		2
Copperas Cove	410945		4,007		3	1		3
Corinth	610125				1	2		3
Corsicana	310177		9,608	4,828	75	54		125
Covington	610129				1			1
Crandall	310192					0		6
Crawford	610130				3			3
Crowley	611435		795	9	18	4		50
Cumby	310218		0	0		0		
Dallas	610134	222,886	251,929	6,260	4,820	730	2	10,246
Dalworthington Gardens	611425		1394	5	3	11		1
Dawson	311780		840	1,077	5	8		14
De Leon	611468		3,357	2,057	30	7		1
Decatur	610150		2,535	1,111	19	7		7
Denison	610153		4,185	20	22	7		65
Denton	610162		9,743	11,559	37	185		224
Deport	310239		0		5	0		
Desdemona	611469				1	0		
DeSoto	610148			10	3	13		36
Detroit	310241				2	0		
Dodd City	310248					0		
Dublin	611470		0		1	0		
Duncanville	610180		5	27	5	8		264
Early	611471		0			2		3
Eastland	612219		0		7	1		2
Ector	310280				4	0		
Edgecliff Village	611436					1		7
Edom	310285				2	0		
Electra	611474		0		4	1		3
Elm Mott	610189		0		3	0		6
Emhouse	310293				2			
Emory	310294				2	0		
Enloe	310297					0		
Ennis	610191		4,331	2,943	42	51		73
Eules	610200		83	13	68	5		41
Eustace	310312				3	0		
Evant	411118				5	0		4
Everman	612054				-5	19		10
Fairfield	311900		3,401		33	1		2
Fairview	962834			0				
Farmers Branch	610208		0	305	298	143		569
Farmersville	612203		0	0	-4	0		
Fate	610209			1,125	1	14		
Ferris	610210			5	6	1		4
Flower Mound	610215			1,088		7		9
Forest Hill	612055		10,543	3,450	40	130		171

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Forney	310325		145	23	1	1		1
Forreston	610216				1	0		1
Fort Worth	610226	133,722	62,137	20,774	2,973	1,006	7	3,632
Franklin	411043			-12	2	8		
Frankston	310329			334	1	2		3
Fredericksburg	410285		467		40	155		260
Frisco	610233				3	0		2
Frost	310335		14,485	442	2	5		3
Gainesville	610297		2,170	248	1	0		8
Garland	610244		16,193	3,303	1,423	117		537
Gatesville	411038					1		3
Georgetown	411289		182	20	39	0		4
Glen Rose	610256		143	40	4	12		8
Glenn Heights	610180			0		1		3
Godley	610259				7	0		2
Goldthwaite	611995		0		6	0		5
Gordon	611477		0		1	0		
Goree	110883		155		0	0		
Gorman	611478				2	0		
Granbury	610263		0	16	1	1		7
Grand Prairie	610265		14,064	11,005	7	37		86
Grandview	610266		412		1	0		1
Granger	410309				17	0		
Grapevine	610267		9	0	8	3		14
Greenville	310388		21	370	12	3		26
Groesbeck	612001		295	27	12	0		5
Gunter	610274				2	1		2
Gustine	611479		4,745		0	0		3
Haltom City	612026		10	32		0	2	53
Hamilton	411119		2,906	44	46	5		90
Hammiln	211099		28		4	0		5
Harker Heights	411047			5	1	0		3
Harrold	611481		1,557	2,234	11	5		1
Haskell	110884		0		13	2		1
Haslet	610282		347					
Hawley	211100		0		2	0		2
Hearne	411044		978	120	40	9		23
Heath	610283		1,781	120	8	2		10
Henrietta	611482		-6			2		14
Hickory Creek	610336			1,479		0		
Hico	611999				3	0		1
Highland Park	612100	8436		0	101	4		149
Highland Village	610352		0	0	2	2		5
Hillsboro	610288		2,644	88	27	9		8
Holland	410339				1			
Holiday	611483		4,020	8,624	5	71		60
Honey Grove	310440				16	1		2
Howe	610292		-120			0		3
Hubbard	610293		144		22	0	1	3
Hurst	610297		4,051	10	27	2		24

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Hutchins	610298				2	1		6
Hutto	411280		6,375	0	3	0		9
Iowa Park	611484		0	0		5		12
Iredell	611557				1	0		
Irving	610304		23,749	4,800	32	138		538
Italy	610308		195		6	0		3
Itasca	610309		0	0	17	0		
Josephine	612205		0		2			
Joshua	610315					0		
Justin	610321					0		
Kamay	611489					0		21
Kaufman	310501		13,181	0	166	7		131
Keene	610323		2,911	72	10	7		9
Keller	610324		930	8	1	4		2
Kemp	310502				5	1		1
Kennedale	612056		1,575		1	10		9
Kerens	310503		0	-27	9	21		
Kerrville	410360		2,022	144	30	2		24
Killeen	411048		0	186	1	2		4
Knox City	110885		0	0	0	2		2
Kosse	610332				1	0		1
Krum	610333				2	1		3
Kurten ML	411079				0			
Lacy Lakeview	962850		4,544			1		1
Ladonia	310530				1	0		
Lake Dallas	610336				2	1		1
Lake Worth	612669					0		4
Lakeside	612668							1
Lakeport	311484				3	0		
Lampasas	411611		300		10	2		30
Lancaster	610341			0	78	7		175
Lawn	211108		68			0		1
Leander	411294							1
Leona	311916					1		1
Leonard	310546		0	0		2		
Lewisville	610350		576	2,647	8	22		35
Lexington	410400		0	0	2	0		2
Lillian	610358			0	3			1
Lincoln Park	611198					0		
Lindsay	610360		0	0		0		
Lipan	611491		7		1	3		1
Little Elm	610946			3,000		0		
Little River-Academy	410954				0			
Llano	410488		519	297	20	1		9
Lometa	410948				9			1
Lone Oak	310872					0		
Longview	310882		11,261	10	53	4		43
Lorraine	211109		20					
Lorena	610955					0		1
Lott	410981		4,898		4	0		
Lueders	211110		0		3	0		
Mabank	310903		0			0		

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Madisonville	311631		963		49	11		41
Malakoff	310904		0	0	12	1		1
Malone	610963		0	0	4	0		
Manor	410510		60					2
Mansfield	610964		2,071	2,903	3	56		65
Marble Falls	410512				7			5
Marlin	410982		6,575	5,029	162	66		185
Mart	610965		0	229	15	1		2
May	611500		0		1			
Maypearl	610966			52	2	1		1
McCaulley	211111		1,536					
McGregor	610967		10,921	2,238	135	51		228
McKinney	610969		1,823	1,509	4	26		33
Megargel	611501		0		22	0		
Melissa	610975		0	704	7	0		
Meridian	610976		0		6	0		1
Merkel	211113		23		25	0		2
Mesquite	610980		2,184	965	43	12		33
Mexia	610983		854	52	14	0		3
Middlethian	610984		0		12	0		7
Midway	311632				1	0		
Miles	211114		0			0		
Millford	610986		370		2	0		
Montague	610993				1	0		1
Moody	610995		4,045	635	29			14
Moran	611502		0		5	0		
Morgan	610996		7		2	0		
Muenster	610998		0			0		1
Munday	110894		247		15	1		7
Murchison	310947					0		
Murphy	610999					1		6
Nevada	612207					0		
Newark	611004				2	0		
Newcastle	611503		0			0		
Nocona	611016		0		7	4		2
Normangee	311633		130		12	4		7
North Richland Hills	612028		-1,517	338		5	1	68
North Zulch	311634				1	1		1
Northlake	612545			2,100		0		8
Novice	611504				1	0		1
Oak Point	611198							5
O'Brien	110899				1	0		
Oakwood	310999			58	5			
Odell	611506		0					1
Oklaunion	611507		0			0		
Olden	611510					0		
Olney	611511		332	32	1	2		5
Osceola	611039							1
Ovilla	611072					-1		
Palestine	311008		4,846	388	30	17		17
Palmer	611040			0	4	5		6
Pantego	611426		0			0		3

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Paradise	611043				1	0		
Paris	311017		19,559	4,096	51	28		66
Pecan Gap	311035			0		0		
Penelope	611048		0		7	4		
Petrolia	611515		0		5	0		
Petty	311041		0		1			
Pickton	311046					0		
Pilot Point	611052		375	6	17	1		2
Plano	611054		-301	-690	3	-49		67
Pleasant Valley	611539				0			
Point	311079				1	0		
Ponder	611057				1	0		1
Pottsboro	611061		0		3	0		4
Pottsville	411120				2			
Poynor	311086				1	1		
Princeton	611064		284	901	2	13		21
Prosper	611070		315	5		2		1
Quanah	110900		1,783		19	6		7
Quinlan	311096				1	0		
Quitman	311097				3	0		4
Ranger	611517		240		11	0		1
Ravenna	311144				2	1		
Reagan	410976		0			1		
Red Oak	611072		59		1	1		12
Rendon	611435		5			0		
Reno (Live Oak Tap)	610949		200		2			
Retreat	311157			243				
Rice	611959			9,555		3		
Richardson	611083		3,288	1,078	-3	87		99
Richland	311159				3	0		1
Richland Hills	612027					4	1	18
Riesel	611085				2	0		
Rio Vista	611086					0		
River Oaks	612670		217			4		14
Roanoke	611089		1,039	15	2	2		5
Robert Lee	211123		111			1		1
Robinson	962853		2,438	14	42	17		31
Roby	211125		0		3	0		1
Rochester	110904				1	1		
Rockdale	410626				20	1		5
Rockwall	611090		0	3,322	1	1		10
Rogers	410942				3			
Roscoe	211127		42		22	0		2
Rosebud	410943		3,914	2,136	145			72
Rotan	211128		5		2	1		5
Round Rock	410633		16	5	5			4
Rowena	211129		0					
Rowlett	611105		114	1,572	10	18		37
Roxton	311171				2	0		
Royse City	611114		70		1	0		

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Rule	110905		0		15	0		2
Runaway Bay	611117				2	0		
Sabine	310552		2,331		3			5
Sachse	611119		3,064	1,128	2	29		34
Sadler	611120		0		1	0		1
Saginaw	611121				6	0		10
Salnt Jo	611122		692	14	10	0		6
San Angelo	211132		26,130	12,647	303	106		349
San Saba	611996		494		5			4
Sanger	611125			407	9	2		6
Sansom Park	612671					0		5
Santa Anna	611521		816	0	25	4		3
Santo	611522		218					
Savoy	611126		52	5	2	1		2
Scurry	311197		1,017	425	1	11		
Seagoville	611387		18	220	163	3		5
Seymour	611523		989		21	0		16
Shady Shores	611132					0		
Sherman	611136		5,670	314	22	6		46
Snyder	211139		1,934	920	24	7		15
Somerville	411080				3	0		2
Southlake	611162		-1,421	-6,279	0	3		22
Southmayd	611163				3	0		
Springtown	611165		0	0	2	0		1
Stanford	211478		0	90	27	2		1
Star	611997				1			
Star Harbor	311228							1
Stephenville	611556		1,700	103	26	2		26
Strawn	611526		97		4	0		
Streetman	311901				1			
Sulphur Springs	311237		2,868	213	29	18		17
Sunnyvale	611388				12	0		1
Sunset	611183		0		1	1		
Sweetwater	211142		3,799	105	79	9		19
Sylvester	211146		0		2	0		
Talpa	612020					0		
Taylor	410708		192	153	8	1		
Teague	311902		4,980	247	74	10		8
Tehuacana	611188		0		1	0		
Temple	410955		58	2,101	35	3		16
Terrell	311258		3,687	5	51	11		60
The Colony	610116			90	1	8		9
Thornton	611366		0			0		
Threll	410780				2			
Throckmorton	611529		549		1	3		1
Tioga	611194		2,904	7,400	6	33		97
Tom Bean	611195				2	1		4
Trent	211148		8					1
Trenton	311310			0	4	0		
Trinidad	311315					1		1
Trophy Club	612301			2,071		13		2

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Troy	410975					1		
Tuscola	211150		0		1	0		
Tye	211152		0			0		
Tyler	310041		1,581	894	12	2		23
UNINCORPORATED	0		28,722	371	368	17		0
University Park	612099	17,357		0	312	12		439
Valera	611530					0		
Valley Mills	611211				2	0		1
Valley View-Cooke	611212					0		
Van Alstyne	611213		443	20		0		3
Venus	611214		2,625	378	14	6		13
Vera	110909		0					
Vernon	611532		1,035	0		7		10
Waco	611218		12,609	2,099	118	27		428
Walnut Springs	611228					0		2
Watauga	611229		8	8	2	2	1	8
Waxahatchie	611230		79,820	1,990	349	11		69
Weinert	110910				1	2		3
Wells Branch	411519							1
West	611240		274	4	8	1		3
Westlake	611243		12					
Westover Hills	610226					1		4
Westworth Village	612672		8,487	-21	113	65		188
White Settlement	612673		2,667	135	19	18		46
Whitehouse	311383		0		12	2		4
Whitesboro	611248		0	0	1	1		4
Whitewright	611251		0		1	0		
Whitney	611252		0		5	1		4
Wichita Falls	611539		12,842	3,174	75	70		152
Wilmer	611264		0		24	2		4
Windom	311396					0		
Wingate	211159		0					
Winters	211160		149		4	0		1
Wolfe City	311402		227	119	0	1		
Woodway	962861			54	59	0		
Wortham	611271		3,559	1,250	6	19		68
Wylie	611273		130		2	4		16
Yantis	311408					1		

Summary	388,432	910,705	229,691	16,390	5,625	18	24,702
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Note: Includes prior calendar year asset adjustments for Distribution Facilities Replacements.



March 9, 2016

Ms. Kari French
Director, Oversight and Safety Division
Railroad Commission of Texas

RECEIVED
RRC OF TEXAS
MAR 09 2016
PIPELINE SAFETY DIVISION
AUSTIN, TEXAS

Ms. French:

Please find attached for your review and approval the Atmos Energy West Texas Division's Distribution Facilities Replacement Completion Report and Distribution Facilities Replacement Work Plan pursuant to the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule.

During the calendar year ending December 31, 2015, the Atmos Energy West Texas Division replaced bare steel mains with indications of active corrosion and other facilities based on an assessment of existing known risk and in response to changing conditions that created risk as they presented themselves during the year (i.e. occurrence of leaks, newly identified threats). In total, the West Texas Division replaced or retired approximately 305,227 feet of steel main, 298,634 feet of plastic main and 3,648 steel services. The Distribution Facilities Replacement Completion Report detailing the distribution facilities replaced or retired by the West Texas Division during the calendar year ending December 31, 2015 is included as an enclosure to this correspondence.

During the calendar year ending December 31, 2016, the Atmos Energy West Texas Division will continue to replace or retire bare steel mains with indications of active corrosion and will continue to replace or retire other facilities based on an assessment of existing, known risk and in response to changing conditions that create risk as they present themselves during the year. In total, the West Texas Division plans to replace or retire approximately 352,900 feet of steel main, 57,600 feet of plastic main and 4,100 steel services. The Distribution Facilities Replacement Work Plan detailing the distribution facilities proposed for replacement by the West Texas Division during the calendar year ending December 31, 2016 is included as an enclosure to this correspondence.

Atmos Energy recognizes that risk characterized in the Work Plan is defined by 'known' conditions that exist within facilities in the distribution system at the time the risk assessment is performed and the Work Plan is established. A risk model cannot quantify unknown, undiscovered or unranked risk. Atmos Energy will take into account these 'unknown' conditions in any given year as they present themselves and may retire or replace facilities in order to mitigate these risks.

We appreciate the opportunity to update the Railroad Commission on work completed in 2015 and your consideration of our replacement plans for 2016. We look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Bill Brooks".

Bill Brooks
Manager, Engineering Services
West Texas Division

Enclosures (2)

Distribution Facilities Replacement Reporting

Atmos Energy West Texas Division

Completion Report (2015)

Material	Distribution Piping (feet)	Service Lines (each)	Components (each)
Steel	305,227	3,648	-
Plastic	298,634	-	-
Misc	-	-	19,351
Grand Total	603,861	3,648	19,351

Work Plan (2016)

Material	Distribution Piping (feet) *	Service Lines (each) *	Components (each) *
Steel	352,900	4,100	-
Plastic	57,600	-	-
Misc	-	-	16,000
Grand Total	410,500	4,100	16,000

*Approximate Figures

Distribution Facilities Replacement Completion Report (2015)

Atmos Energy West Texas Division

City	System ID	Distribution Piping Material (feet)		Service Line Material (each)	Components (each)
		Steel	Plastic	Steel	
Abernathy	110012				18
Amarillo	110017	43,435	1,309	320	3,927
Amherst	110024	10,854	-	74	55
Anton	110025	360	-	1	77
Big Spring	210075	37,588	351	296	692
Bovina	110059				15
Brownfield	110069	360	196	17	367
Buffalo Springs	110071				15
Bushland	110073		-	1	8
Canyon	110089	5,037	146	155	67
Channing	110097	20	-	-	3
Coahoma	210117		429	4	55
Cotton Center	110124				1
Crosbyton	110131	-	15	-	13
Dalhart	110140	4,001	2	13	230
Dimmitt	110154	1,696	126	33	92
Earth	110163		-	3	7
Edmonson	110166		3,961	1	2
Floydada	110184	966	-	20	39
Forsan	210211				1
Friona	110193	81	10	10	116
Fritch	110194				74
Hale Center	110223	-	10	6	28
Happy	110227	1,287	7	2	1
Hart	110231	-	1	2	18
Hartley	110232				7
Hereford	110237	8,745	46,060	102	639
Idalou	110246	514	6	1	34
Kress	110274	-	83	2	8
Lamesa	210350	462	-	6	246
Lenorah	210355				-
Levelland	110294	348	451	16	341
Littlefield	110322	10,150	2,670	222	359
Lockney	110326	94	-	1	13
Loop	210627				1
Lorenzo	110329	1,401	21,600		-
Lubbock	130475	38,168	60,983	558	4,604
Meadow	110347				3
Midland	210660	37,923	7,949	785	2,037
Muleshoe	110379	346	8,532	4	297
Nazareth	110385				6
New Deal	110386	-	-	-	9

Distribution Facilities Replacement Completion Report (2015)

Atmos Energy West Texas Division

City	System ID	Distribution Piping Material (feet)		Service Line Material (each)	Components (each)
		Steel	Plastic	Steel	
New Home	110387				3
North R/D (Lubbock)	111111		8,006	19	-
North RD (Amarillo)	110494	10,260	240	27	-
Odessa	210730	8,516	4,905	246	1,832
O'Donnell	210723				4
Olton	110401				42
Pampa	110415	8,345	1,262	219	860
Panhandle	110421	1,516	5	11	79
Petersburg	110432	21	-	-	33
Plainview	110440	21,578	55,102	408	864
Post	110451	110	-	2	115
Quitaque	110460	-	108	4	7
Ralls	110461	10	-	-	8
Ropesville	110495				18
Sanford	110501				6
Seagraves	210796	25	30,733	4	55
Seminole	210797	3,275	24,560	4	186
Shallowater	110513	-	30	-	137
Silverton	110523		15,226		25
Slaton	110528	14	1	3	82
Smyer	110529				43
South RD (Amarillo)	110282	24,101	-	4	31
Southland	110532		-		6
Springlake	110535				1
Stanton	210818	13,674	1	7	35
Sudan	110546	9,867	-	12	40
Tahoka	110565	-	-	1	33
Tulla	110582	79	282	11	38
Turkey	110585				10
Umbarger Farwell	130471				1
Vega	110592	-	1,906	10	15
Vigo Park Rural	110594				-
Welch	210913				3
Wellman	110609	-	1,370	1	9
Whitharrall	110623				3
Wildorado	111129				5
Wilson	110628				7
Wolfforth	110632				190
Grand Total		305,227	298,634	3,648	19,351



March 13, 2017

Ms. Kari French
Director, Oversight and Safety Division
Railroad Commission of Texas

Ms. French:

Please find attached for your review and approval the Atmos Energy West Texas Division's Distribution Facilities Replacement Completion Report and Distribution Facilities Replacement Work Plan pursuant to the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule.

During the calendar year ending December 31, 2016, the Atmos Energy West Texas Division replaced bare steel mains with indications of active corrosion and other facilities based on an assessment of existing known risk and in response to changing conditions that created risk as they presented themselves during the year (i.e. occurrence of leaks, newly identified threats). In total, the West Texas Division replaced or retired approximately 504,754 feet of steel main, 171,864 feet of plastic main and 4,447 steel services. The Distribution Facilities Replacement Completion Report detailing the distribution facilities replaced or retired by the West Texas Division during the calendar year ending December 31, 2016 is included as an enclosure to this correspondence.

During the calendar year ending December 31, 2017, the Atmos Energy West Texas Division will continue to replace or retire bare steel mains with indications of active corrosion and will continue to replace or retire other facilities based on an assessment of existing, known risk and in response to changing conditions that create risk as they present themselves during the year. In total, the West Texas Division plans to replace or retire approximately 325,100 feet of steel main, 54,100 feet of plastic main and 5,300 steel services. The Distribution Facilities Replacement Work Plan detailing the distribution facilities proposed for replacement by the West Texas Division during the calendar year ending December 31, 2017 is included as an enclosure to this correspondence.

Atmos Energy recognizes that risk characterized in the Work Plan is defined by 'known' conditions that exist within facilities in the distribution system at the time the risk assessment is performed and the Work Plan is established. A risk model cannot quantify unknown, undiscovered or unranked risk. Atmos Energy will take into account these 'unknown' conditions in any given year as they present themselves and may retire or replace facilities in order to mitigate these risks.

We appreciate the opportunity to update the Railroad Commission on work completed in 2016 and your consideration of our replacement plans for 2017. We look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Bill Brooks".

Bill Brooks
Manager, Engineering Services
West Texas Division

Enclosures (2)

Distribution Facilities Replacement Reporting

Atmos Energy West Texas Division

Completion Report (2016)

Material	Distribution Piping (feet)	Service Lines (each)	Components (each)
Steel	504,754	4,447	-
Plastic	171,864	-	-
Misc	-	-	16,014
Grand Total	676,618	4,447	16,014

Work Plan (2017)

Material	Distribution Piping (feet) *	Service Lines (each) *	Components (each) *
Steel	325,100	5,300	-
Plastic	54,100	-	-
Misc	-	-	15,000
Grand Total	379,200	5,300	15,000

*Approximate Figures

Distribution Facilities Replacement Completion Report (2016)
Atmos Energy West Texas Division

City	System ID	Distribution Piping Material (feet)		Service Line Material (each)	Components (each)
		Steel	Plastic	Steel	
Abernathy	110012			1	16
Amarillo/Bushland	110017	110,506	630	651	3,067
Amherst	110024				20
Anton	110025	382			29
Bovina	110059	3,961		24	27
Brownfield	110069	10,145	5,214	60	202
Buffalo Springs Lake	110071			1	3
Canyon	110089	1,982	14,910	22	77
Channing	110097		3,053		103
Crosbyton	110131	758		1	5
Dalhart	110140	2,769	9	12	81
Dimmitt	110154	467		4	117
Earth	110163	60			15
Edmonson	110166	7,805	3,030	58	2
Floydada	110184	1,431		3	14
Friona	110193				30
Fritch	110194	5		3	49
Hale Center	110223				10
Happy	110227				3
Hart	110231				16
Hartley	110232				13
Hereford	110237	29,117	82,191	78	227
Idalou	110246	10		1	12
Kress	110274	5			4
Levelland	110294	12,049	14	118	465
Littlefield	110322	14,186	29	116	316
Floyd County Rural	110326	20	10		4
Lorenzo	110329		264	1	1
Lubbock	110332	33,671	12,697	576	3,661
Meadow	110347				5
Muleshoe	110379	31		1	192
Nazareth	110385				4
New Deal	110386		5		6
New Home	110387	7		1	1
Olton	110401	32		2	21
Pampa	110415	3,915	3,531	78	666
Panhandle	110421	1,275		8	95
Petersburg	110432	60			11
Plainview	110440	55,935	26,023	837	965
Post	110451	6		2	36
Quitaque	110460				4
Ralls	110461	1,755		3	1
Ropesville	110495	240			11
Sanford	110501			3	3
Shallowater	110513		18		33
Silverton	110523	141		1	14
Slaton	110528	460		2	31
Smyer	110529			36	32
Southland	110532				1
Springlake	110535	79			4
Sudan	110546	5			22
Tahoka	110565	16		1	15
Tulia	110582	162	10	2	10

Distribution Facilities Replacement Completion Report (2016)
Atmos Energy West Texas Division

City	System ID	Distribution Piping Material (feet)		Service Line Material (each)	Components (each)
		Steel	Plastic	Steel	
Turkey	110585	20		3	4
Vega	110592				6
Wellman	110609				1
Whitharrall	110623				2
Wilson	110628	7	5	1	2
Wolfforth	110632		5		91
Lubbock County Rural	111111	43,711	19,655	351	13
Wildorado	111129				43
Big Spring	210075	44,052	5	242	692
Coahoma	210117			2	72
Lamesa	210350	303		13	119
Midland	210660	51,212	495	421	1,522
O'Donnell	210723	195			3
Odessa	210730	44,259	60	631	2,169
Seagraves	210796	73		4	49
Seminole	210797	1,355	1	15	388
Stanton	210818	185		8	34
Welch	210913				3
Tanglewood	960822				9
Hartley/Moore Counties Rural	962958	200		3	3
Potter County Rural	962959	25,230		40	
Randall/Armstrong Counties Rural	962960			2	8
Deaf Smith/Oldham Counties Rural	962978				1
Carson/Gray Counties Rural	963063			1	3
Terry/Yoakum/Gaines Counties Rural	963065				1
Lynn/Garza Counties Rural	963066			1	
Opdyke West	964501				2
Briscoe/Hall Counties Rural	964582				2
Howard/Martin/Dawson Counties Rural	964583	481		1	
Ector County Rural	964584			1	
Midland County Rural	964850	23			
Grand Total		504,754	171,864	4,447	16,014



March 9, 2018

Ms. Karl French
Director, Oversight and Safety Division
Railroad Commission of Texas

Ms. French:

Please find attached for your review and approval the Atmos Energy West Texas Division's Distribution Facilities Replacement Completion Report and Distribution Facilities Replacement Work Plan pursuant to the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule.

During the calendar year ending December 31, 2017, the Atmos Energy West Texas Division replaced bare steel mains with indications of active corrosion and other facilities based on an assessment of existing known risk and in response to changing conditions that created risk as they presented themselves during the year (i.e. occurrence of leaks, newly identified threats). In total, the West Texas Division replaced or retired approximately 381,608 feet of steel main, 172,862 feet of plastic main and 2,461 steel services. The Distribution Facilities Replacement Completion Report detailing the distribution facilities replaced or retired by the West Texas Division during the calendar year ending December 31, 2017 is included as an enclosure to this correspondence.

During the calendar year ending December 31, 2018, the Atmos Energy West Texas Division will continue to replace or retire bare steel mains with indications of active corrosion and will continue to replace or retire other facilities based on an assessment of existing, known risk and in response to changing conditions that create risk as they present themselves during the year. In total, the West Texas Division plans to replace or retire approximately 380,200 feet of steel main, 35,900 feet of plastic main and 6,400 steel services. The Distribution Facilities Replacement Work Plan detailing the distribution facilities proposed for replacement by the West Texas Division during the calendar year ending December 31, 2018 is included as an enclosure to this correspondence.

Atmos Energy recognizes that risk characterized in the Work Plan is defined by 'known' conditions that exist within facilities in the distribution system at the time the risk assessment is performed and the Work Plan is established. A risk model cannot quantify unknown, undiscovered or unranked risk. Atmos Energy will take into account these 'unknown' conditions in any given year as they present themselves and may retire or replace facilities in order to mitigate these risks.

We appreciate the opportunity to update the Railroad Commission on work completed in 2017 and your consideration of our replacement plans for 2018. We look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Culp".

Mike Culp
Manager of Compliance
Atmos Energy Corporation
West Texas Division

Enclosure

Distribution Facilities Replacement Reporting
Atmos Energy West Texas Division

Cumulative Completion Report (2011-2017)

Material	Distribution Piping (feet)	Service Lines (each)	Components (each)
Steel	2,117,063	22,450	-
Plastic	869,301	-	-
Misc.	-	-	70,771
Grand Total	2,986,364	22,450	70,771

Work Plan (2017)

Material	Distribution Piping (feet) *	Service Lines (each) *	Components (each) *
Steel	325,100	5,300	-
Plastic	54,100	-	-
Misc.	-	-	15,000
Grand Total	379,200	5,300	15,000

Completion Report (2017)

Material	Distribution Piping (feet)	Service Lines (each)	Components (each)
Steel	381,608	2,461	-
Plastic	172,662	-	-
Misc.	-	-	17,640
Grand Total	554,270	2,461	17,640

Work Plan (2018)

Material	Distribution Piping (feet) *	Service Lines (each) *	Components (each) *
Steel	380,200	6,400	-
Plastic	35,900	-	-
Misc.	-	-	15,000
Grand Total	416,100	6,400	15,000

*Approximate Figures

Distribution Facilities Replacement Completion Report (2017)
Atmos Energy West Texas Division

City	System ID	Distribution Piping Material (feet)		Service Line Material (each)	Components (each)
		Steel	Plastic	Steel	
Abernathy	110012	60	-	2	198
Amarillo/Bushland	110017	58,211	4,478	364	3,929
Amherst	110024	9,052	-	-	39
Anton	110025	-	18,576	-	26
Bovina	110059	-	-	3	6
Brownfield	110069	773	8	3	259
Buffalo Springs Lake	110071	-	-	-	3
Canyon	110089	1,096	-	1	59
Channing	110097	-	-	-	-
Crosbyton	110131	-	5	-	11
Dalhart	110140	82	-	2	92
Dimmitt	110154	5	4,529	2	77
Earth	110163	-	-	-	5
Edmonson	110166	680	15,692	4	-
Floydada	110184	150	199	1	17
Friona	110193	36	15	2	120
Fritch	110194	-	-	1	735
Hale Center	110223	-	-	2	7
Happy	110227	-	11,916	1	-
Hart	110231	-	-	-	7
Hartley	110232	-	-	-	110
Hereford	110237	2,047	1,984	173	100
Idalou	110246	-	-	-	20
Kress	110274	-	-	-	16
Levelland	110294	365	10,212	137	365
Littlefield	110322	-	11	-	317
Lorenzo	110329	28	1,700	-	-
Lake Ransom Canyon	110332	85,701	1,555	449	4,403
Meadow	110347	-	15	-	48
Muleshoe	110379	-	-	1	345
Nazareth	110385	5,124	-	14	19
New Deal	110386	-	-	-	4
New Home	110387	-	-	-	3
Olton	110401	-	5	-	16
Pampa	110415	1,406	4,285	12	218
Panhandle	110421	437	-	3	427
Petersburg	110432	226	-	1	18
Plainview	110440	27,383	19,598	189	270
Post	110451	10,302	-	55	64
Quitaque	110460	-	30	-	11
Ralls	110461	4,479	-	1	10
Ropesville	110495	20	-	1	43
Sanford	110501	-	-	-	27
Shallowater	110513	5	20	3	38
Silverton	110523	-	-	-	20
Slaton	110528	5,785	242	51	64
Smyer	110529	-	13,611	88	58
Southland	110532	-	-	-	3
Springlake	110535	-	-	-	1
Sudan	110546	-	-	-	15
Tahoka	110565	5	-	2	10

Distribution Facilities Replacement Completion Report (2017)
 Atmos Energy West Texas Division

City	System ID	Distribution Piping Material (feet)		Service Line Material (each)	Components (each)
		Steel	Plastic	Steel	
Tulia	110582	10,634	5	76	31
Turkey	110585	1	-	2	12
Vega	110592	21	-	2	11
Wellman	110609	677	-		40
Whitharral	110623				1
Wilson	110628		-		7
Wolfforth	110632				160
Wildorado	111129		-	1	-
Big Spring	210075	10,945	-	58	901
Coahoma	210117	296	-	2	43
Lamesa	210350	85	-	2	132
Midland	210660	52,758	18,736	334	951
O'Donnell	210723				4
Odessa	210730	79,167	1,043	408	2,093
Seagraves	210796	4,155	4,500		61
Seminole	210797	475	28,292		251
Stanton	210818	23	-		28
Welch	210913		200	2	3
Tanglewood	960822				257
Opdyke West	964501				1
Forsan	210211	8,913	11,200	6	-
Lenorah	210355				-
Loop	210627				-
Tarzan	210859				-
Grand Total		381,608	172,662	2,461	17,640



March 13, 2019

Ms. Kari French
Director, Oversight and Safety Division
Railroad Commission of Texas

Ms. French:

Please find attached for your review and approval the Atmos Energy West Texas Division's Distribution Facilities Replacement Completion Report and Distribution Facilities Replacement Work Plan pursuant to the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule.

During the calendar year ending December 31, 2018, the Atmos Energy West Texas Division replaced bare steel mains with indications of active corrosion and other facilities based on an assessment of existing known risk and in response to changing conditions that created risk as they presented themselves during the year (i.e. occurrence of leaks, newly identified threats). In total, the West Texas Division replaced or retired approximately 522,690 feet of steel main, 111,963 feet of plastic main, and 4,896 services lines. Note that while the original estimate in the 2018 Work Plan for steel service line replacement was 6,400, ultimately areas of larger diameter pipe were replaced that contained fewer service lines, resulting in a lower actual count than originally estimated. The Distribution Facilities Replacement Completion Report detailing the distribution facilities replaced or retired by the West Texas Division during the calendar year ending December 31, 2018 is included as an enclosure to this correspondence.

During the calendar year ending December 31, 2019, the Atmos Energy West Texas Division will continue to replace or retire bare steel mains with indications of active corrosion and will continue to replace or retire other facilities based on an assessment of existing, known risk and in response to changing conditions that create risk as they present themselves during the year. In total, the West Texas Division plans to replace or retire approximately 426,775 feet of steel main, 37,615 feet of plastic main and 4,344 steel services. The Distribution Facilities Replacement Work Plan detailing the distribution facilities proposed for replacement by the West Texas Division during the calendar year ending December 31, 2019 is included as an enclosure to this correspondence.

As we know, the risk characterized in the Work Plan is defined by known conditions that exist within facilities in the distribution system at the time the risk assessment is performed and the Work Plan is established, based on the risk model reviewed and approved by the Commission. The risk model cannot quantify unknown, undiscovered or unranked risk. We will continue to take into account any "unknown" conditions as they present themselves and may retire or replace facilities in order to mitigate these risks.

We appreciate the opportunity to update the Railroad Commission on work completed in 2018 and your consideration of our replacement plans for 2019. We look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Ric Kissinger", with a stylized flourish at the end.

Ric Kissinger
Vice President of Technical Services
Atmos Energy Corporation
West Texas Division
(806)798-4432

Enclosures (2)

Distribution Facilities Replacement Completion Report (2018)
 Atmos Energy West Texas Division

Cumulative Completion Report (2011-2018)			
Material	Distribution Piping (Feet)	Service Lines (Each)	Components (Each)
Steel	2,497,263	27,364	
Plastic	981,264		
Misc.			86,091
Grand Total	3,478,527	27,364	86,091

Work Plan 2018			
Material	Distribution Piping (Feet)	Service Lines (Each)	Components (Each)
Steel	380,200	6,400	
Plastic	35,900		
Misc.			15,000
Grand Total	416,100	6,400	15,000

*Approximate Figures

Completion Report 2018			
Material	Distribution Piping (Feet)	Service Lines (Each)	Components (Each)
Steel	522,690	4,896	
Plastic	111,963		
Misc.			15,429
Grand Total	634,653	4,896	15,429

Work Plan 2019			
Material	Distribution Piping (Feet)	Service Lines (Each)	Components (Each)
Steel	426,775	4,344	
Plastic	37,615		
Misc.			10,000
Grand Total	464,390	4,344	10,000

*Approximate Figures

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy West Texas Division

Row Labels	RRC System ID	Distribution Piping Material (Feet)		Service Line Material (each)	Components (each)
		Steel	Plastic	Steel	Components
ABERNATHY	110012		5		7
AMARILLO/BUSHLAND	110017	84,477	18,885	953	3,866
AMHERST	110024	12,546	16		13
ANTON	110025	16,988	60	113	31
BIG SPRING	210075	11,203	112	41	86
BOVINA	110059	33	1		8
BROWNFIELD	110069	24,047	159	144	467
BUFFALO SPRINGS LAKE	110071		20		2
CANYON	110089	735	20	5	827
CHANNING	110097	10	-		1
COAHOMA	210117	516	-	34	29
CROSBYTON	110131		1		8
DALHART	110140	1,186	2		58
DIMMITT	110154	694	269	46	21
EARTH	110163		-		25
EDMONSON	110166		-		1
FLOYDADA	110184	10	16		29
FORSAN	210211	5,084	-	36	-
FRIONA	110193	32	4		107
FRITCH	110194		1		331
HALE CENTER	110223		-		20
HAPPY	110227	307	-		3
HART	110231	7	1		59
HARTLEY	110232		-		1
HEREFORD	110237	7,995	540	7	78
IDALOU	110246		15		11
KRESS	110274		-		7
LAKE RANSOM CANYON	110281		2		12
LAMESA	210350	783	386	3	80
LEVELLAND	110294	66	42	47	536
LITTLEFIELD	110322	949	148		57
LOOP	210627		-		-
LORENZO	110329		106		1
LUBBOCK	110332	73,901	8,784	893	4,557
MEADOW	110347		-		1
MIDLAND	210660	68,796	20,467	406	840
MULESHOE	110379	426	418		76
NAZARETH	110385	250	15	1	1
NEW DEAL	110386		30		12
NEW HOME	110387		1		3
ODESSA	210730	76,737	11,108	720	1,497
O'DONNELL	210723		5		8
OLTON	110401		-		18
OPDYKE WEST	964501	169	7		1
PAMPA	110415	338	756	1	270
PANHANDLE	110421	13	-		28
PETERSBURG	110432		-		37
PLAINVIEW	110440	51,703	42,315	788	170
POST	110451	10,301	1	49	112
QUITAQUE	110460		-		5
RALLS	110461		2		5
ROPESVILLE	110495	402	40		2
SANFORD	110501		-		22
SEAGRAVES	210796	40	66		39

Distribution Facilities Replacement Completion Report (2018)
Atmos Energy West Texas Division

SEMINOLE	210797	5	36		78
SHALLOWATER	110513	8,373	18	24	64
SILVERTON	110523	461	-	2	19
SLATON	110528	15,578	5,828	220	197
SMYER	110529		-	31	3
SOUTHLAND	110532		-		-
SPRINGLAKE	110535		-		1
STANTON	210818		8		38
SUDAN	110546	116	1		23
TAHOKA	110565	5,467	12	1	24
TANGLEWOOD	960822		1		2
TIMBERCREEK/PALISADES/ MCMURTRY/CANYON WEST	960822		-		193
TULIA	110582	41,858	953	330	149
TURKEY	110585	20	251		4
VEGA	110592		-		9
WELCH	210913		-		1
WELLMAN	110609		-		3
WHITHARRAL	110623		-		2
WILDORADO	111129		-		-
WILSON	110628		-		7
WOLFFORTH	110632	68	29	1	126
Grand Total		522,690	111,963	4,896	15,429

DAVID PORTER, CHAIRMAN
CHRISTI CRADDICK, COMMISSIONER
RYAN SITTON, COMMISSIONER



KARI FRENCH
DIVISION DIRECTOR

RAILROAD COMMISSION OF TEXAS
OVERSIGHT AND SAFETY DIVISION
PIPELINE SAFETY DEPARTMENT

April 18, 2016

455-21
Mr. Jeffrey S. Knights, Vice President
Atmos Energy Corporation – Mid-Tex Division
5420 LBJ Freeway, Suite 1800
Dallas, TX 75240-3705

Re: 16 TAC §8.209, Distribution Facilities
Replacements

Dear Mr. Knights,

On March 15, 2011, the Pipeline Safety Division published 16 TAC §8.209, Distribution Facilities Replacements, related to the integrity of gas distribution systems. This letter is in response to your procedural changes provided.

Procedures for your gas distribution system(s) have been received and approved. A safety inspection will be conducted in the near future to evaluate the implementation of your submitted procedures for adequacy.

If you have any questions or need assistance, please do not hesitate to contact Stephanie Weidman in Austin Headquarters at 512-463-7058.

Respectfully,

A handwritten signature in black ink, appearing to read "Kari L. French", written over a horizontal line.

Kari L. French
Oversight and Safety Director



March 9, 2016

Ms. Kari French
Director, Oversight & Safety Division
Railroad Commission of Texas
Post Office Box 12967
Austin, Texas 78711

RECEIVED
RRC OF TEXAS
MAR 09 2016
PIPELINE SAFETY DIVISION
AUSTIN, TEXAS

Dear Kari:

Please find attached for your review and approval the revised Atmos Energy Distribution Facilities Replacement Written Plan, which outlines how Atmos Energy intends to comply with the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule. This plan was revised from its original language to primarily add clarity around how Atmos Energy addresses risk within its facilities and does not alter the approach we have taken to date. This is the first such revision of the plan since its original filing.

We appreciate the Railroad Commission's consideration of these revisions and look forward to your response.

Sincerely,


Andy Treadway


Mike Culp

Director, Regulatory and Compliance
Mid-Tex

Manager, Compliance
West Texas

ATMOS ENERGY DISTRIBUTION FACILITIES REPLACEMENT WRITTEN PLAN

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ATMOS ENERGY DISTRIBUTION FACILITIES REPLACEMENT WRITTEN PLAN

1 INTRODUCTION

1.1 GENERAL

Atmos Energy developed this Distribution Facilities Replacement Written Plan, the entirety of which is contained in this document, to comply with the requirements of Railroad Commission of Texas Rule 16 TAC 8.209, Distribution Facilities Replacement (Rule 8.209). The Distribution Facilities Replacement Written Plan will be referred to as the "Written Plan" throughout the remainder of this document.

The objective of the Atmos Energy Written Plan is to set forth the procedures by which Atmos Energy will establish (1) a prioritized schedule for the replacement of those facilities that pose the greatest known, relative risk to the operation of our natural gas distribution systems in Texas (the "Distribution Facilities Replacement Program"), and (2) a process to identify and replace previously unidentified, at-risk facilities that are discovered as part of the Company's day-to-day operations. The Distribution Facilities Replacement Program will work in conjunction with the Atmos Energy DIM (Distribution Integrity Management) Plan pursuant to applicable Federal Code (49 CFR 192.1007) by using scheduled replacements and/or retirements to manage identified risks associated with the integrity of distribution facilities.

This Written Plan is applicable to Atmos Energy's Mid-Tex and West Texas divisions that operate natural gas distribution systems and related facilities in Texas. These operators will collectively be referred to as "Atmos Energy" throughout the remainder of this document.

1.2 REGULATORY APPLICABILITY

The requirements of Rule 8.209 apply to all distribution-related facilities owned and operated by Atmos Energy, including but not limited to:

Transmission Lines

Facilities that operate at or above 20% SMYS that are part of the overall distribution system.

Mains

High-pressure facilities located downstream from sources of gas supply that serve as a common source of supply for more than one service line.

Service Lines

Distribution lines that transport gas from a common source of supply to an individual customer, to two adjacent or adjoining residential or small commercial customers, or to multiple residential or small commercial customers served through a meter header or manifold. A service line ends at the outlet of the customer meter or at the connection to a customer's piping, whichever is further downstream, or at the connection to customer piping if there is no meter.

Related Facilities

Appurtenances through which natural gas is transported, including district regulator stations, regulators, relief valves, valves, service regulators and Company-owned meters.

ATMOS ENERGY DISTRIBUTION FACILITIES REPLACEMENT WRITTEN PLAN

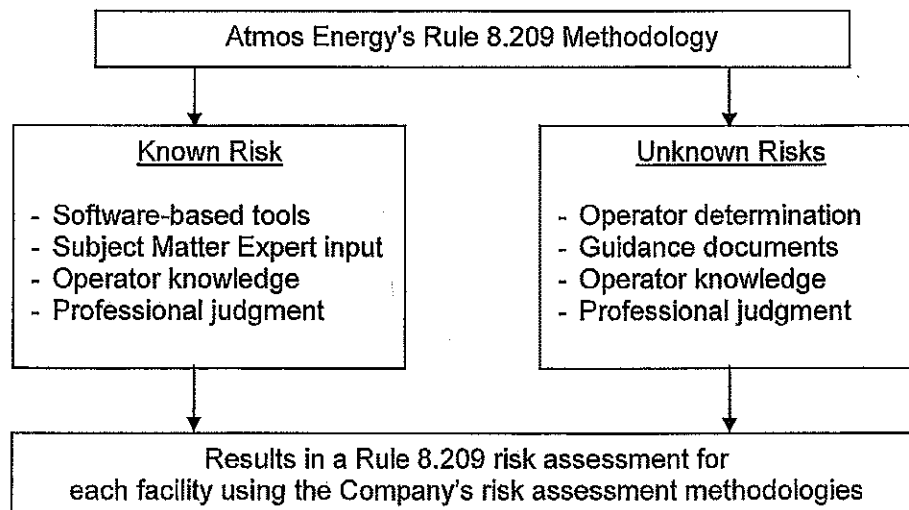
2 OVERVIEW OF ATMOS ENERGY'S APPROACH

2.1 GENERAL

Consistent with Rule 8.209, Atmos Energy's Written Plan is designed to determine whether continued operation of an existing facility creates a risk to the Company's distribution system. If a facility is determined to present an operational risk requiring replacement or retirement, Atmos Energy accounts for any resulting expenditure as a Rule 8.209 project. This is true regardless of how or when the risk is identified or the type of replacement or retirement activity that is undertaken to eliminate the risk.

Atmos Energy will use operator knowledge and professional judgment to identify, assess, and rank the risk to distribution facilities. Facilities will be grouped for analysis by similar physical and operating characteristics with consideration of construction material, location, operating pressure, vintages, operations and maintenance history, and other relevant factors. The Company's risk analysis is supported by software-based tools to determine ranking for known risks. An overall ranking of distribution facilities based on known risks is established using the numerical risk score and subject matter expert (SME) input.

The Company's approach to complying with the requirements in Rule 8.209 involves risk assessments that fall into two broad categories: (1) an annual, forward-looking risk assessment of facilities based on risks known at the time the annual risk ranking is performed (known risks), and (2) an in-the-field or real-time risk assessment that is performed for specific facilities whose risks the Company discovers during the course of routine work in the field or as a result of unforeseen circumstances (unknown risks). After the Company identifies a facility that presents a risk to its system, the Company will give consideration to replacing or retiring at-risk facilities in a manner that is designed to best serve the overall operational needs of the system. This approach is illustrated as follows:



Steel service lines do not pose the greatest risk to the Company's system. Therefore, steel service line provisions under Rule 8.209(d), (f) and (g) are not applicable. However, steel service lines are considered relative high risk facilities and as such are eligible for replacement or retirement under Rule 8.209.

ATMOS ENERGY DISTRIBUTION FACILITIES REPLACEMENT WRITTEN PLAN

2.2 KNOWN RISKS

The Company performs an annual risk analysis and ranking for facilities to determine known risks. The Company may rely on operator knowledge, professional judgment, software-based risk assessment tools, and SME analysis (or a combination of these methods) to provide input into known risks.

KNOWN RISK FACILITY GROUPS

Select facility groups are eligible without the necessity of being risk ranked on an annual basis. These facility groups may include, but are not limited to, cast iron facilities, cathodically unprotected steel facilities, early generation plastic facilities and obsolete components. Additional groups of facilities may be added from time-to-time based on demonstrated performance of a facility group, industry experience with a facility group and regulatory guidance regarding a facility group.

Once a risk is identified, the identified facility is considered for replacement or retirement per Rule 8.209. Identified facilities will be replaced or retired in a manner that best serves the overall operational needs of the system at the time of replacement or retirement.

2.3 UNKNOWN RISKS

The Company routinely discovers facilities that present previously unknown risks. When unknown risks are discovered during the course of routine work or as part of day-to-day operations, Company personnel assess the risk of the facility based on system knowledge, professional judgment and guidelines for assessing whether a project qualifies for Rule 8.209 treatment.

UNKNOWN RISK FACILITY GROUPS

Select facility groups are eligible for Rule 8.209 treatment without the necessity of being risk ranked. One such facility group is relocation/road moves qualifying under Rule 8.209(e)(5). Additional facility groups may be added from time-to-time based on Rule 8.209 requirements.

Once a risk is identified, the identified facility is considered for replacement or retirement under Rule 8.209. Identified facilities will be replaced or retired in a manner that best serves the overall operational needs of the system at the time of replacement or retirement.

3 SYSTEM KNOWLEDGE

3.1 GENERAL

Atmos Energy gathers information about the Company's distribution infrastructure from existing records of design, construction, and operations & maintenance activities as well as SME input. Atmos Energy uses the same data sources used to file the PHMSA Form 7100.1-1 Annual Report for Gas Distribution Systems and the data submitted on the Railroad Commission of Texas PS-95 Semi-Annual Leak Report. Atmos Energy files separate Form 7100.1-1 and PS-95 reports for the Mid-Tex and the West Texas Divisions.

ATMOS ENERGY DISTRIBUTION FACILITIES REPLACEMENT WRITTEN PLAN

The Company relies on data that is available at the time annual risk analysis is conducted to identify the distribution facilities that pose high relative risks to the operation of the system per the requirements of Rule 8.209(d). Types of data relied on by the Company may include, but are not limited to the data identified in Section 3.2 below.

3.2 DISTRIBUTION FACILITY DATA

To the extent available at the time the risk analysis is conducted, the following distribution facility data will be gathered, documented, and updated for use in the risk analysis.

- Pipe Location
- Corrosion
- Pipe Attributes and operations and maintenance history (including leaks)
- Environmental factors
- Other factors

Elements of data and information that should be considered in risk analysis are further discussed in Rule 8.209(e).

3.3 SUBJECT MATTER EXPERTS

Atmos Energy relies, in part, on SMEs to identify and review distribution facility risks. A SME is any person(s) knowledgeable about the design, construction, operations, maintenance activities, or the system characteristics of Atmos Energy's distribution systems.

4 COMPLIANCE

4.1 MEETING FACILITY REPLACEMENT REQUIREMENTS

In each division, Atmos Energy will identify those known facilities that pose the highest relative risk to the operation of the system and replace those facilities in accordance with Rule 8.209(h).

In addition, Atmos Energy recognizes that facilities and associated risks contained in the Work Plan reflect only 'known' conditions that exist within facilities in the distribution system at the time the annual risk assessment is performed. The risk model used to identify facilities in the Work Plan cannot quantify unknown, undiscovered or unranked risk at the time of the annual assessment. For this reason, Atmos Energy will take into account any 'unknown' conditions in a given year as they present themselves and may replace or retire facilities in order to mitigate these previously unknown risks.

4.2 DISTRIBUTION FACILITIES REPLACEMENT WORK PLAN

Atmos Energy will comply with report filing requirements in Rule 8.209(i). Each Division will file separate reports consisting of the following:

- Completion Report – Distribution facilities replaced during the prior calendar year listed by system ID and material.
- Work Plan – Distribution facilities with known risks that Atmos Energy proposes to replace for the current calendar year.

ATMOS ENERGY DISTRIBUTION FACILITIES REPLACEMENT WRITTEN PLAN

Atmos Energy annually identifies System ID information for facilities replaced or retired under Rule 8.209 during the previous calendar year. This information is provided by the Company to the Commission during its Distribution Facilities Replacement reporting as required under Rule 8.209. Such system ID information is defined as the town in which the replacement or retirement took place.