

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

REQUEST OF ATMOS ENERGY CORPORATION)
FOR MODIFICATION AND EXTENSION OF ITS)
GAS COST ADJUSTMENT PERFORMANCE BASED) CASE NO.
RATEMAKING MECHANISM) 2020-00289

PETITION FOR CONFIDENTIALITY

Atmos Energy Corporation (Atmos Energy), by counsel, petitions for an order granting confidential protection of certain responses to the Post Hearing Data Request 1, pursuant to 807 KAR 5:001, Section 13 and KRS 61.878.

Item 1-07 requests:

For each month from June 2016 through May 2021, provide the (1) Inside FERC first of the month posting for ANR-Louisiana, (2) the Inside FERC first of the month posting for Texas Gas Zone 1, (3) the Inside FERC first of the month posting for Tennessee Louisiana 500 Leg, (4) the Inside FERC first of the month posting for South Louisiana-Henry Hub, (5) the Inside FERC first of the month posting for Trunkline Louisiana, (6) the New York Mercantile Exchange Settled Closing Price, and (7) the Inside FERC first of the month posting for Texas Gas Zone SL.

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proprietary basis and to the best of its knowledge is not publicly disclosed or available. Similar information was determined to be confidential in Duke Energy's Application for Rate Adjustment, Case No. 2017- 00321, Order of May 3, 2018, and Application of Big Rivers, Order of January 22, 2020, Case No. 2019-00365.

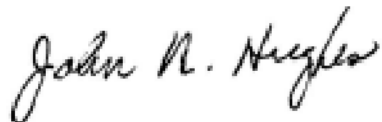
The Kentucky Open Records Act exempts from disclosure certain confidential or proprietary information. KRS 61.878(1)(c). To qualify for this exemption and, therefore, maintain the confidentiality of the information, a party must establish that disclosure of the information would permit an unfair commercial advantage to competitors of the party seeking confidentiality.

The information sought in the data requests is commercial information that if disclosed could cause substantial competitive harm to Atmos Energy. These portions of Atmos Energy's Response contain proprietary information that would aid competitors of Atmos Energy and such proprietary information is subject to protection from disclosure pursuant to Kentucky law. This information is not publicly available. It would be difficult or impossible for someone to discover this information from other sources. If this information were available to competitors in this form, they could use it to the competitive detriment of Atmos Energy. This information is not generally disclosed to non-management employees of Atmos Energy and is protected internally by the Company as proprietary information. The disclosure of this proprietary information would result in significant or irreparable competitive harm to Atmos Energy by providing its competitors with non-reciprocal competitive advantage. No public purpose is served by the disclosure of such information.

Atmos Energy requests that the information be held confidentially indefinitely. The statutes cited above do not allow for disclosure at any time. Given the competitive nature of the natural gas business and the efforts of non-regulated competitors to encroach upon traditional markets, it is imperative that regulated information remain protected and that the integrity of the copy righted information and tax filings remain secure.

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

Submitted by:



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Certification:

I certify that is a true and accurate copy of the original documents; that the electronic filing was transmitted to the Commission on February 16, 2022; and that no party has been excused from participation by electronic means.

John N. Hedges