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February 8, 2022

Linda C. Bridwell
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: Atmos Energy Corporation
Case No. 2020-00289

Dear Ms. Bridwell:

Atmos Energy Corporation pursuant to the order of February 7, 2022, submits the revised response AG DR 1-13.

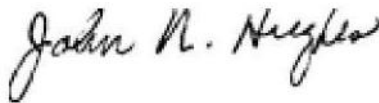
I certify that the electronic documents are true and correct copies of the original documents and that no party has been excused from electronic service.

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

Submitted By:

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And



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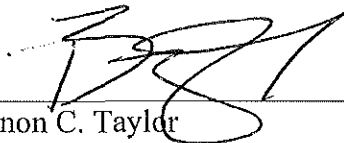
Attorneys for Atmos Energy Corporation

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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

AFFIDAVIT

The Affiant, Brannon C. Taylor, being duly sworn, deposes and states that the attached responses to the Attorney General's first request for information are true and correct to the best of his knowledge and belief.

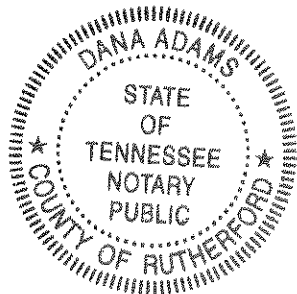


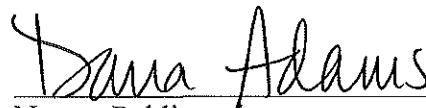
Brannon C. Taylor

STATE OF Tennessee

COUNTY OF Williamson

SUBSCRIBED AND SWORN to before me by Brannon C. Taylor on this the 12 th day of November, 2020.





Notary Public
My Commission Expires: 9/19/22

Case No. 2020-00289
Atmos Energy Corporation, Kentucky Division
AG DR Set No. 1
Question No. 1-13 Revised
Page 1 of 1

REQUEST:

Refer to the Report, page 2. Atmos states that it filed a proposal to extend its existing PBR program for two months in order to synchronize the term of the RFP with its current asset management contract.

- a. With regard to the PBR mechanism, provide the names of all companies that Atmos has contracted with for asset management between 2010-2020, and the corresponding year(s) each company acted as the asset manager.
- b. Explain in detail the asset manager's duties as it relates to the PBR mechanism.
- c. Explain whether any of the current or past asset managers are affiliated with Atmos.

RESPONSE:

- a. Please see Attachment 1 for a list of Kentucky asset managers between 2010 and 2020.
- b. The asset managers have no duties whatsoever related to the PBR mechanism. The asset managers' duties pertain the provision of natural gas supply and asset management of the Company's transportation and storage capacity, as stated in the contracts.
- c. Atmos Energy had an affiliated asset manager, Atmos Energy Marketing, LLC. (AEM), prior to January 2017. On January 3, 2017, CenterPoint Energy Services, Inc. (CES) purchased one hundred percent of the equity ownership interest of AEM. As a result of that transaction, AEM became a wholly-owned subsidiary of CES. Atmos Kentucky has not had a marketing affiliate since that date. Prior to 2017, Atmos Energy petitioned for and received KY PSC approval of each Kentucky asset management arrangement with the affiliate.

Respondent: Brannon C. Taylor

ATTACHMENT:

ATTACHMENT 1 - AG_1-13_Att1 - KY Asset Managers.xlsx, 1 Page.

Respondent: Brannon C. Taylor

Atmos Energy Corporation, Kentucky
Asset Managers
2010 - 2020

June 1, 2006 – May 31, 2011
June 1, 2011 – March 31, 2012
June 1, 2011 - October 31, 2015
April 1, 2012 – March 31, 2014
April 1, 2014 – March 31, 2015
April 1, 2015 – March 31, 2017

November 1, 2015 – October 31, 2020
April 1, 2017 – March 31, 2020
April 1, 2020 – March 31, 2023
November 1, 2020 - October 31, 2023

Atmos Energy Marketing, LLC (entire KY distribution system)
Atmos Energy Marketing, LLC (KY TGP service area)
Atmos Energy Marketing, LLC (KY TGT/Trunkline service area)
Twin Eagle Resource Management, LLC (KY TGP service area)
Atmos Energy Marketing, LLC (KY TGP service area)
Twin Eagle Resource Management, LLC (KY TGP service area)
Atmos Energy Marketing, LLC (KY TGT/Trunkline area) as of 2017 the
above contract was with non-affiliate CenterPoint Energy Services, Inc.
as of June 2020, the above contract was with non-affiliate Symmetry
Energy Solutions, LLC.
United Energy Trading, LLC (KY TGP service area)
United Energy Trading, LLC (KY TGP service area)
Symmetry Energy Solutions (KY TGT/Trunkline area)