

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ATMOS	)	CASE NO.
ENERGY CORPORATION FOR AN ADJUSTMENT	)	2021-00214
OF RATES	)	

**ATTORNEY GENERAL’S MOTION FOR LEAVE TO ALLOW WITNESS KOLLEN  
TO VERBALLY AMEND HIS DIRECT TESTIMONY AT HEARING; ALTERNATIVE  
MOTION TO ALLOW FOR PANEL-STYLE EXAMINATION AT HEARING OF  
WITNESSES LIMITED TO TAXATION ISSUES**

The intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention [“OAG”], respectfully moves the Commission for leave to allow his witness Mr. Lane Kollen, at the evidentiary hearing in the above-styled matter which is scheduled to begin on December 14, 2021, to verbally amend his written direct testimony filed into the record on September 30, 2021. The purpose of this verbal amendment is to address new information regarding taxation issues and how they affect the revenue requirement in this matter, which the petitioner Atmos Energy Corporation [“Atmos”] set forth in its rebuttal testimony filed into the record on November 18, 2021. Since this new information was not in the record as of the date Mr. Kollen filed his direct testimony, and further since the procedural schedule does not allow for the filing of sur-rebuttal testimony or additional discovery, the Attorney General requests that, he be allowed to address these issues in the hearing.

Alternatively, the Attorney General respectfully moves the Commission to allow for a simultaneous panel-style examination of both Mr. Kollen and such witness as Atmos identifies who is competent to address such tax issues. A simultaneous examination will allow for greater

efficiency and economy of time in the hearing, would not prejudice either party, and likely will prove helpful to the Commission and to both parties as well.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion.

Respectfully submitted,  
DANIEL J. CAMERON  
ATTORNEY GENERAL



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**Certificate of Service**

Pursuant to the Commission's Order dated July 22, 2021 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record.

This 30<sup>th</sup> day of November, 2021



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Assistant Attorney General