

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

Telephone: (502) 227-7270

[jnhughes@johnnhughespsc.com](mailto:jnhughes@johnnhughespsc.com)

August 23, 2021

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

Re: Atmos Energy Corporation  
Case No. 2021-00214

Dear Ms. Bridwell:

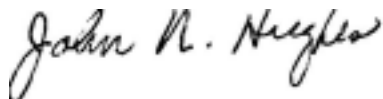
Atmos Energy Corporation submits its responses to the Attorney General's First Data Request. I certify that the electronic documents are true and correct copies of the original documents and that no party has been excused from electronic service.

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

Submitted By:

Mark R. Hutchinson  
Wilson, Hutchinson and Littlepage  
611 Frederica St.  
Owensboro, KY 42301  
270 926 5011  
[randy@whplawfirm.com](mailto:randy@whplawfirm.com)

And



John N. Hughes  
124 West Todd St.  
Frankfort, KY 40601  
502 227 7270  
[jnhughes@jnhughes@johnnhughespsc.com](mailto:jnhughes@jnhughes@johnnhughespsc.com)

Attorneys for Atmos Energy Corporation

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

IN THE MATTER OF:

Application of Atmos Energy Corporation	)	
for an Adjustment of Rates	)	Case No. 2021-00214
and Tariff Modifications	)	

**PETITION FOR CONFIDENTIALITY  
FOR RESPONSE TO ITEMS 1-14, and 1-15  
OF THE ATTORNEY GENERAL'S  
FIRST SET OF INFORMATION REQUEST**

Atmos Energy Corporation (Atmos Energy), by counsel, petitions for an order granting confidential protection of responses to the Attorney General's First Data Request, pursuant to 807 KAR 5:001, Section 13 and KRS 61.878.

Items 1-14 and 1-15 request Atmos Energy to:

14. Identify each of the affiliates/subsidiaries of Atmos Energy Corporation, Inc. ("AEC") that comprise the affiliate group included in the AEC consolidated federal tax return.

15. Provide a schedule showing the history of the taxable income and losses for AEC in total and separated into utility, nonregulated, and other for each month, each quarter, each fiscal year, and each calendar year since January 2015 through the end of the test year in this proceeding. Indicate whether AEC maintains sufficiently detailed records to record the taxable income and losses by: i) utility, nonregulated, and other, and/or ii) rate division, or if these determinations must be determined after the fact.

Atmos requests confidential treatment for responses to those requests. KRS 61.878(1)(k) exempts from public disclosure "all public records or information the disclosure of which is prohibited by federal law or regulation." Federal law codified in 26 U.S.C.A. 5 6103(a), prohibits state officials from publicly disclosing any federal

income tax return or its contents, making the requested federal income tax return exempt.

Returns and return information shall be confidential, and except as authorized by this title ... no officer or employee of any State ... shall disclose any return or return information obtained by him in any manner in connection with his service as such an officer or an employee or otherwise or under the provisions of this section....

The term "return information" means a taxpayer's identity, the nature, source, or amount of his income, payments, receipts, deductions, exemptions, credits, assets, liabilities, net worth, tax liability, tax withheld, deficiencies, overassessments, or tax payments, whether the taxpayer's return was, is being, or will be examined or subject to other investigation or processing, or any other data, received by, recorded by, prepared by, furnished to, or collected by the Secretary with respect to a return or with respect to the determination of the existence, or possible existence, of liability (or the amount thereof) of any person under this title for any tax, penalty, interest, fine, forfeiture, or other imposition, or offense.

The effect of these two statutes is to preclude disclosure of the federal tax return.

Additionally, KRS 131.190(1) requires that all income tax information filed with the Kentucky Revenue Cabinet be treated in a confidential manner:

**131.190 Information acquired in tax administration not to be divulged -- Exceptions.**

(1) (a) No present or former commissioner or employee of the Department of Revenue, present or former member of a county board of assessment appeals, present or former property valuation administrator or employee, present or former secretary or employee of the Finance and Administration Cabinet, former secretary or employee of the Revenue Cabinet, or any other person, shall intentionally and without authorization inspect or divulge any information acquired by him of the affairs of any person, or information regarding the tax schedules, returns, or reports required to be filed with the department

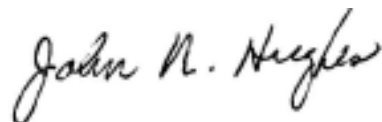
or other proper officer, or any information produced by a hearing or investigation, insofar as the information may have to do with the affairs of the person's business.

Thus, the requested state income tax return is also confidential and protected from disclosure by KRS 61.878(1)(1), which exempts from the Kentucky Open Records Act "...public records or information the disclosure of which is prohibited or restricted or otherwise made confidential by enactment of the General Assembly."

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 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:



John N. Hughes  
124 West Todd St.  
Frankfort, KY 40601  
502 227 7270  
[jnhughes@johnnhughespsc.com](mailto:jnhughes@johnnhughespsc.com)

And

Mark R. Hutchinson  
Wilson, Hutchinson & Littlepage

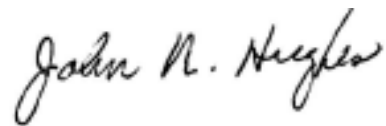


611 Frederica St.  
Owensboro, KY 42303  
270 926 5011  
Fax: 270-926-9394  
randy@whplawfirm.com

Attorneys for Atmos Energy Corporation

Certification:

I certify that is a true and accurate copy of the original documents; that the electronic filing was transmitted to the Commission on August 23, 2021; and that no party has been excused from participation by electronic means.

A handwritten signature in black ink, reading "John R. Hughes". The signature is written in a cursive style with a large initial "J" and "H".


COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF )  
RATE APPLICATION OF ) Case No. 2021-00214  
ATMOS ENERGY CORPORATION )

CERTIFICATE AND AFFIDAVIT

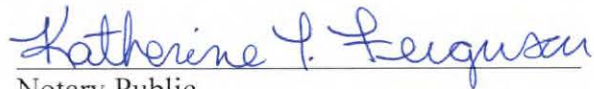
The Affiant, Timothy (Ryan) Austin, being duly sworn, deposes and states that the attached responses to the Office of the Attorney General's first request for information are true and correct to the best of his knowledge and belief.



Timothy R. Austin

STATE OF KENTUCKY  
COUNTY OF DAVIESS

SUBSCRIBED AND SWORN to before me by Timothy R. Austin on this the 23<sup>rd</sup> day of August, 2021.



Notary Public

My Commission Expires: 12/17/22

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF )  
RATE APPLICATION OF ) Case No. 2021-00214  
ATMOS ENERGY CORPORATION )


CERTIFICATE AND AFFIDAVIT

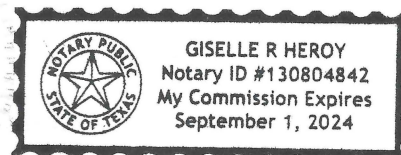
The Affiant, Joe T. Christian, being duly sworn, deposes and states that the attached responses to the Office of the Attorney General's first request for information are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Joe T. Christian

STATE OF TEXAS  
COUNTY OF DALLAS

SUBSCRIBED AND SWORN to before me by Joe T. Christian on this the 20<sup>th</sup>  
day of August, 2021.

  
\_\_\_\_\_  
Notary Public  
My Commission Expires:  
9/01/2024



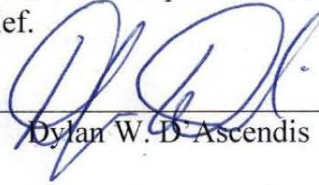
COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF )  
RATE APPLICATION OF ) Case No. 2021-00214  
ATMOS ENERGY CORPORATION )


CERTIFICATE AND AFFIDAVIT

The Affiant, Dylan W. D'Ascendis, being duly sworn, deposes and states that the attached responses to the Office of the Attorney General's first request for information are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Dylan W. D'Ascendis

STATE OF NEW JERSEY  
COUNTY OF BURLINGTON

SUBSCRIBED AND SWORN to before me by Dylan W. D'Ascendis on this the 17  
day of August, 2021.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 6/9/2024

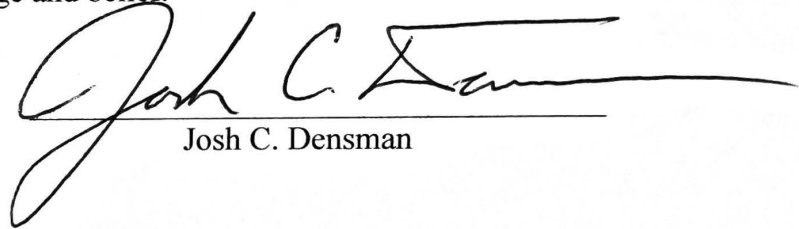
COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF )  
RATE APPLICATION OF ) Case No. 2021-00214  
ATMOS ENERGY CORPORATION )

CERTIFICATE AND AFFIDAVIT

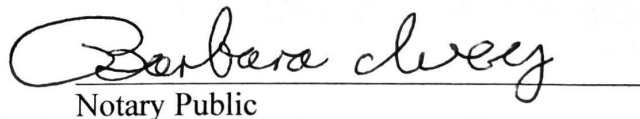
The Affiant, Josh C. Densman, being duly sworn, deposes and states that the attached responses to the Office of the Attorney General's first request for information are true and correct to the best of his knowledge and belief.

  
Josh C. Densman

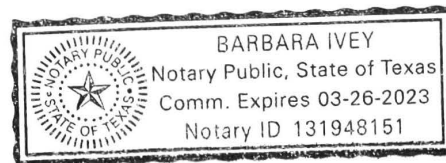
STATE OF TEXAS

COUNTY OF ~~DALLAS~~  
COLLIN

SUBSCRIBED AND SWORN to before me by Josh C. Densman on this the 18 day of August, 2021.

  
Notary Public

My Commission Expires: 03-26-2023



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF )  
RATE APPLICATION OF ) Case No. 2021-00214  
ATMOS ENERGY CORPORATION )


CERTIFICATE AND AFFIDAVIT

The Affiant, Michelle H. Faulk, being duly sworn, deposes and states that the attached responses to the Office of the Attorney General's first request for information are true and correct to the best of her knowledge and belief.

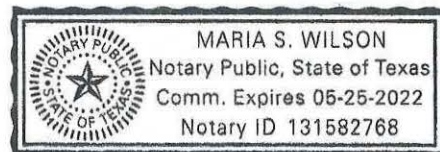
  
Michelle H. Faulk

STATE OF TEXAS  
COUNTY OF DALLAS

SUBSCRIBED AND SWORN to before me by Michelle H. Faulk on this the 18 day of August, 2021.

  
Notary Public

My Commission Expires: 5/25/22





COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF )  
RATE APPLICATION OF ) Case No. 2021-00214  
ATMOS ENERGY CORPORATION )

AFFIDAVIT

The Affiant, Catherine Huang, being duly sworn, deposes and states that the attached responses to the Office of the Attorney General's first request for information are true and correct to the best of her knowledge and belief.



\_\_\_\_\_  
Catherine Huang

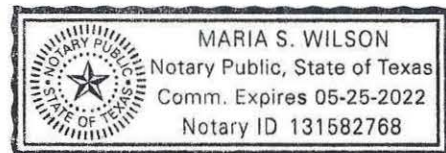
STATE OF Dallas  
COUNTY OF Denton

SUBSCRIBED AND SWORN to before me by Catherine Huang on this the 18 day of August, 2021.



\_\_\_\_\_  
Notary Public

My Commission Expires: 5/25/22



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF )  
RATE APPLICATION OF ) Case No. 2021-00214  
ATMOS ENERGY CORPORATION )

CERTIFICATE AND AFFIDAVIT

The Affiant, Brannon C. Taylor, being duly sworn, deposes and states that the attached responses to the Office of 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 DAVIDSON

SUBSCRIBED AND SWORN to before me by Brannon C. Taylor on this the 17 day of August, 2021.



  
\_\_\_\_\_  
Notary Public  
My Commission Expires: 11/17/24

My Commission Expires  
November 17, 2024



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF )  
RATE APPLICATION OF ) Case No. 2021-00214  
ATMOS ENERGY CORPORATION )

CERTIFICATE AND AFFIDAVIT

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

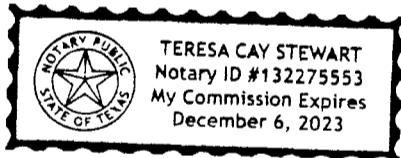
Dane A. Watson  
Dane A. Watson

STATE OF TEXAS  
COUNTY OF COLLIN

SUBSCRIBED AND SWORN to before me by Dane A. Watson on this the 14 day of August, 2021.

Teresa C. Stewart  
Notary Public

My Commission Expires: Dec 6, 2023



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-01**  
**Page 1 of 1**

**REQUEST:**

Did the Company receive funds under the Paycheck Protection Program? If it did:

- a. Provide the total amount received under the program.
- b. Discuss whether that amount must be repaid.
- c. Discuss how those funds were applied.
- d. Discuss whether those funds offset increases to the revenue required by the Company.

**RESPONSE:**

The Company has not received funds under the Paycheck Protection Program.

- a. - d. Not applicable.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-02**  
**Page 1 of 2**

**REQUEST:**

Identify all association dues included in the revenue requirement. For each organization whose dues were included for recovery from ratepayers:<sup>1</sup>

- a. Provide the name of the association to which those are paid;
- b. Provide the amount;
- c. Provide a description of the services the association provides to the Company;
- d. Discuss whether the association engages, directly or indirectly, in: (i) lobbying; (ii) political activities; (iii) regulatory advocacy; and/or (iv) public relations;
- e. Provide copies of the studies or other information DEK relied upon in making its decision on whether to include a test-year amount of dues for each such organization;
- f. Provide copies of all actual regulatory advocacy in which each such organization engaged before the Commission; and
- g. Discuss whether any portion of the dues paid to that association have been removed from the revenue requirement.

**RESPONSE:**

- a. Please see Attachment 1 for the association names for association dues included in the test year revenue requirement.
- b. Please see Attachment 1 for association dues amounts included in the test year revenue requirement.
- c. Please see Attachment 2 for a description of the AGA, SGA, and Professional Membership Associations. The majority of other items in Attachment 1 are local and state civic organizations engaged in the overall economic development in and around our Kentucky service area. The Company did note that there are a some line items, such as Sam's and One Health, that should have been coded to a separate subaccount and are not "Association" dues.
- d. Atmos Energy has identified the AGA and Kentucky Chamber of Commerce as organizations that engage, directly or indirectly, in one or more of the listed activities.
- e. Please see Attachment 3. Atmos Energy relied on these AGA and Kentucky Chamber of Commerce invoices for determine the percentage of dues allocable to lobbying activities for exclusion from the forecasted test year revenue requirement.

---

<sup>1</sup> Including, but not limited to the American Gas Association.

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-02**  
**Page 2 of 2**

- f. The Company is unaware of any actual regulatory advocacy engaged in on behalf of the Company or its membership before the Commission.
- g. For excluding a portion of AGA dues relating to lobbying activities, Atmos Energy looked at 2020 and 2021 AGA dues invoices (please see Attachment 3 for 2020 and 2021 AGA invoices). The 2020 invoice indicates that 6.2% of AGA dues are allocable to lobbying whereas the 2021 invoice indicates that 3.8% of AGA dues are allocable to lobbying. To be conservative, Atmos Energy elected to use the 2020 percentage and excludes 6.2% of AGA dues from the forecasted test year revenue requirement.

For excluding a portion of Kentucky Chamber of Commerce dues relating to lobbying activities, Atmos Energy looked at Kentucky Chamber of Commerce dues invoices (please see Attachment 3). Kentucky Chamber of Commerce invoices that indicate 85% of dues are not allocable to lobbying activity -- thus 15% of dues are allocable to lobbying. Therefore, Atmos Energy has excluded 15% of Chamber of Commerce dues from the forecasted test year revenue requirement.

Please see Attachment 1 for details as to the dues amounts for AGA and the Chamber of Commerce that Atmos Energy excludes from the forecasted test year revenue requirement.

**ATTACHMENTS:**

ATTACHMENT 1 - AG\_1-02\_Att1 - Association Dues.xlsx, 1 Page.

ATTACHMENT 2 - AG\_1-02\_Att2 - Association Descriptions, 2 Pages.

ATTACHMENT 3 - AG\_1-02\_Att3 - AGA and KY Chamber of Commerce Invoices.pdf, 5 Pages.

Respondent: Joe Christian

Atmos Energy Corporation, Kentucky/Mid-States Division  
Kentucky Jurisdiction Case No. 2021-00214  
Association Dues for Forecast Test Period, January 2022–December 2022

Data From Schedule F.1 in Atmos Energy's Revenue Requirements Model

Line No.	Association	Dues	Percentage		Adjustment %	Adjustment	Adjusted Amount
			Jurisdictional	Jurisdictional			
1	AGA	55,578	<u>100%</u>	55,578	6.2%	(3,446)	52,132 <u>1/</u>
2	ASME	158		158			158
3	BUILDING INDUSTRY ASSOCIATION OF GREATER LOUISVILLE	475		475			475
4	CADIZ TRIGG COUNTY ECONOMIC DEVELOP COMM	500		500			500
5	CHAMBER OF COMMERCE	42,878		42,878	15.0%	(6,432)	36,447 <u>2/</u>
6	CRITTENDEN COUNTY ECONOMIC	100		100			100
7	ECONOMIC DEVELOPMENT COUNCIL	11,000		11,000			11,000
8	FRANKLIN SIMPSON INDUSTRIAL AUTHORITY	5,000		5,000			5,000
9	GIRLS INC.	500		500			500
10	GLASGOW BARREN COUNTY CHAMBER OF COMMERCE	2,575		2,575			2,575
11	GREATER OWENSBORO ECONOMIC DEVELOPMENT CORP	10,000		10,000			10,000
12	GREATER OWENSBORO REALTOR ASSOCIATION	256		256			256
13	GREATER PADUCAH ECONOMIC DEVELOPMENT COUNCIL INC	3,000		3,000			3,000
14	HOME BUILDERS ASSOCIATION	810		810			810
15	HOME BUILDERS ASSOCIATION OF OWENSBORO	475		475			475
16	HOPKINS COUNTY PVA	55		55			55
17	KENTUCKY ASSOCIATION FOR ECONOMIC DEVELOPMENT	20,000		20,000			20,000
18	KENTUCKY ASSOCIATION OF MANUFACTURERS	1,740		1,740			1,740
19	KENTUCKY ASSOCIATION OF MASTER CONTRACTORS INC	2,500		2,500			2,500
20	KENTUCKY COUNTY JUDGE EXECUTIVE ASSOCIATION	200		200			200
21	KENTUCKY GAS ASSOCIATION	10,250		10,250			10,250
22	KENTUCKY GAZETTE	374		374			374
23	KENTUCKY OIL AND GAS ASSOCIATION	1,020		1,020			1,020
24	KENTUCKY RESTAURANT ASSOCIATION	395		395			395
25	KENTUCKY VFW PROGRAM	98		98			98
26	LOGAN COUNTY HOME BUILDERS	350		350			350
27	NACE INTERNATIONAL	588		588			588
28	NATIONAL GAS DISTRIBUTORS ASSOCIATION OF EAST TENNESSEE	250		250			250
29	NATIONAL SOCIETY OF PROFESSIONAL ENGINEERS	299		299			299
30	OHIO COUNTY CHAMBER OF COMMERCE	319		319			319
31	OKLAHOMA ACCOUNTANCY BOARD	26		26			26
32	ONE HEALTH	75		75			75
33	PADUCAH BOARD OF REALTORS INC	300		300			300
34	REALTOR ASSOCIATION OF SOUTHERN KENTUCKY	200		200			200
35	SAM'S CLUB	310		310			310
36	SOUTHERN GAS ASSOCIATION	82		82			82
<b>Total Forecasted Period</b>		<b>172,736</b>		<b>172,736</b>		<b>(9,878)</b>	<b>162,859</b>

NOTES:

- 1/ Exclusion for lobbying: using higher percentage of 6.2% per 2020 invoice versus 3.8% per 2021 invoice  
2/ Exclusion for lobbying per the following statement appearing on Chamber of Commerce invoice:

*Membership dues are not deductible as a charitable contribution. In compliance with the Omnibus Budget Reconciliation Act of 1993, 85 percent of your dues may be deductible as an ordinary business expense and are not allocable to lobbying activity.*

## **American Gas Association**

### Vision Statement

Committed to leveraging and utilizing America's abundant, domestic, affordable and clean natural gas to help meet the nation's energy and environmental needs.

### Mission Statement

The American Gas Association (AGA) represents companies delivering natural gas safely, reliably, and in an environmentally responsible way to help improve the quality of life for their customers every day. AGA's mission is to provide clear value to its membership and serve as the indispensable, leading voice and facilitator on its behalf in promoting the safe, reliable, and efficient delivery of natural gas to homes and businesses across the nation.

## **ASME: American Society of Mechanical Engineers**

ASME, the American Society of Mechanical Engineers, is a nonprofit membership organization that promotes the art, science, and practice of multidisciplinary engineering and allied sciences around the globe. It develops mechanical engineering standards regarding the proper design, construction, and testing of many mechanical devices, ensuring predictability in production and reliability in use. ASME is an ANSI accredited standards developer. It was founded in 1800 by a small group of leading industrialists and has grown to include more than 130,000 members in 151 countries. 32,000 of the members are students.

## **Girls Inc.**

In partnership with schools and at Girls Inc. centers, we focus on the development of the whole girl. She learns to value herself, take risks, and discover and develop her inherent strengths. The combination of long-lasting mentoring relationships, a pro-girl environment, and evidence-based programming equips girls to navigate gender, economic, and social barriers, and grow up healthy, educated, and independent. Informed by girls and their families, we also advocate for legislation and policies to increase opportunities and rights for all girls.

## **The Association for Materials Protection and Performance (AMPP), formerly NACE International**

### How We Advance Industry

AMPP represents the largest global community of corrosion and protective coatings professionals. Our members are dedicated to advancing technical and practical expertise in corrosion prevention and control. AMPP provides members with the knowledge and resources to ensure high performance materials are used to build and maintain sustainable infrastructure.

## **National Society of Professional Engineers**

### Our Vision

A world where the public can be confident that engineering decisions affecting their lives are made by qualified and ethically accountable professionals

### Our Mission

To foster licensed professional engineers in service to society

## **Southern Gas Association**

### About Us

As the only US natural gas trade association supporting all sectors of the industry, we know that each individual natural gas professional plays a critical role in driving our industry forward. We invest in the future of natural gas by investing in our members and providing opportunities to learn, exchange ideas and share solutions.





## AMERICAN GAS ASSOCIATION 2020 DUES RULES

### FULL MEMBERS

1. AGA Dues for U.S. Gas Utility members are based on the average of 2016, 2017 and 2018 gas operating income\* and the following income blocks and rates:

Block 1	First	\$ 10,000,000	1.0468%
Block 2	Next	\$ 7,500,000	.6710%
Block 3	Next	\$ 20,000,000	.4481%
Block 4	Next	\$ 40,000,000	.3200%
Block 5	Next	\$ 80,000,000	.2550%
Block 6	Over	\$ 157,500,000	.1500%

In applying the above formula, the maximum annual increase for any company equals 3.75%, and the maximum decrease equals 3.75%.

2. For companies that merge or are acquired whose dues would have decreased, the dues of the resulting company will equal the combined dues of the merging companies immediately prior to the merger for 4 years with no dues increases for increased operating income. After 4 years, the company's dues will be assessed via the formula structure, and any reduction in dues will be phased-in over a 4-year period or until the phased-in amount equals the formula dues, whichever comes first.
3. If necessary, the Board may approve the redistribution of any remaining AGA budget deficit to the members based on each company's share of total dues revenue.
4. For distribution companies with less than 75,000 meters, the maximum distribution company dues are equal to \$0.90/meter\*\*. When dues are capped at \$0.90/meter, the maximum annual increase/decrease provision does not apply.
5. No company, whose full company or subsidiary meets the eligibility standards of full membership, will be allowed to join as a Limited Member. All regulated U.S. gas distribution subsidiaries of a parent organization must be included in the dues calculations.
6. Minimum Gas Company 2020 dues are \$2,135.

\*Gas operating income is defined as Line 11, Schedule II of the Uniform Statistical Report.

\*\*Meters are defined as Line 17 (total), Schedule XX of the Uniform Statistical Report.

Please contact Kevin Hardardt, Chief Financial and Administrative Officer at (202) 824-7250 regarding any questions about the invoice or rules.



Post Office Box 79226  
Baltimore, Maryland 21279-0226  
Telephone (202)824-7256  
Fax (202)824-7256/ Email: jpierce@aga.org

# Atmos Energy Corporation

## 2021 DUES

Year ending December 31, 2021

Full Member Company  Limited Member Company

A.G.A. Dues Rules are attached. Dues are based upon the following operating income information (\$000):

2017 689,603      2018 543,482      2019 595,208      Average 609,431

**YOUR 2020 DUES WERE ..... \$ 1,028,020**

**YOUR 2021 DUES ARE ..... \$ 1,059,066 Pay this amount**

## 2021 Payment Schedule

Full amount enclosed       Semi-annually (Jan.1, July 1)  
 Quarterly (Jan.1, Apr.1, July 1, Oct.1)       Other (Please state)

Please return this completed form to the A.G.A. Treasurer at the above address. Payments may also be directed to the address noted above.

Invoice to: ..... Approved: .....  
Account Coding: ..... Title .....  
010.0000.1650.13028.002000.0000 ..... Date: .....  
American Gas Association Annual Dues

Phone: ( ) ..... - .....

Email .....

### **IMPORTANT IRS REQUIRED NOTICE**

Dues payments, contributions or gifts to the American Gas Association are not tax deductible as charitable contributions for federal income tax purposes. However, they may be deductible as ordinary and necessary business expenses subject to restrictions imposed as a result of AGA's lobbying activities as defined by the Budget Reconciliation Act of 1993. AGA estimates that the nondeductible portion of your 2021 dues -- **the portion that is allocable to lobbying is 3.8%.**

# AMERICAN GAS ASSOCIATION 2021 DUES RULES

## FULL MEMBERS

1. AGA Dues for U.S. Gas Utility members are based on the average of 2017, 2018 and 2019 gas operating income\* and the following income blocks and rates:

Block 1	First	\$ 10,000,000	1.0468%
Block 2	Next	\$ 7,500,000	.6710%
Block 3	Next	\$ 20,000,000	.4481%
Block 4	Next	\$ 40,000,000	.3200%
Block 5	Next	\$ 80,000,000	.2550%
Block 6	Over	\$ 157,500,000	.1500%

In applying the above formula, the maximum annual increase for any company equals 3.02%, and the maximum decrease equals 4.02%.

2. For companies that merge or are acquired whose dues would have decreased, the dues of the resulting company will equal the combined dues of the merging companies immediately prior to the merger for 4 years with no dues increases for increased operating income. After 4 years, the company's dues will be assessed via the formula structure, and any reduction in dues will be phased-in over a 4-year period or until the phased-in amount equals the formula dues, whichever comes first.
3. If necessary, the Board may approve the redistribution of any remaining AGA budget deficit to the members based on each company's share of total dues revenue.
4. For distribution companies with less than 75,000 meters, the maximum distribution company dues are equal to \$0.90/meter\*\* When dues are capped at \$0.90/meter, the maximum annual increase/decrease provision does not apply.
5. No company, whose full company or subsidiary meets the eligibility standards of full membership, will be allowed to join as a Limited Member. All regulated U.S. gas distribution subsidiaries of a parent organization must be included in the dues calculations.
6. Minimum Gas Company 2021 dues are \$2,135.

\*Gas operating income is defined as Line 11, Schedule II of the Uniform Statistical Report.

\*\*Meters are defined as Line 17 (total), Schedule XX of the Uniform Statistical Report.

Please contact Kevin Hardardt, Chief Financial and Administrative Officer at (202) 824-7250 regarding any questions about the invoice or rules.



**Kentucky Chamber**  
*Uniting Business. Advancing Kentucky.*

464 Chenault Road Frankfort, KY 40601 phone 502-695-4700 fax 502-695-5051

Mr. Mark Marlin  
 VP, Rates & Regulatory Affairs  
 Atmos Energy Corporation  
 3275 Highland Pointe Dr  
 Owensboro, KY 42303-7835

(270) 685-8024  
 mark.marlin@atmosenergy.com

CASE NO. 2021-00214  
 ATTACHMENT 3  
 TO AG DR 10-1-02

# Membership Renewal - Invoice No. 35552020

**Date:** 8/23/2020  
**Original Join Date:** 03/01/1949  
**Membership Dates:** 10/01/2020 - 09/30/2021

KCC Federal Tax ID: 61-0405718

**ROUTE TO  
 SIDNEY HUDSON**

Verify information at left and note any updates.

**Remit to:**  
 Kentucky Chamber of Commerce  
 464 Chenault Road  
 Frankfort, KY 40601

**We want to assure you that the Kentucky Chamber's work in support of Kentucky's business community continues as we face this uncertain and unprecedented time. If you have any questions about your membership or need assistance in any way, please contact us at (859) 221-8813.**

Company	Member Number	Due Date	Membership Dues
Atmos Energy Corporation	3555	10/31/2020	\$18,225.00
<b>Chamber Action Fund</b>			
Your voluntary contribution to the Chamber Action Fund is used in the most critical situations to garner needed public support on important business issues. Action Fund dollars are used exclusively to advance member-supported issues and are not used for political activity.			\$50.00
<i>Membership dues are not deductible as a charitable contribution. In compliance with the Omnibus Budget Reconciliation Act of 1993, 85 percent of your dues may be deductible as an ordinary business expense and are not allocable to lobbying activity.</i>			
<b>Total Due</b>			<b>\$18,275.00</b>

**Please return this portion with payment.**

Company	Member Number	Due Date	Membership Dues
Atmos Energy Corporation	3555	10/31/2020	\$18,225.00
<b>Please select your area(s) of interest:</b> <input type="checkbox"/> Human Resources <input type="checkbox"/> Political Education <input type="checkbox"/> Fiscal Policy <input type="checkbox"/> Health & Wellness <input type="checkbox"/> Energy & Environmental <input type="checkbox"/> OSHA <input type="checkbox"/> Manufacturing <input type="checkbox"/> Small Business <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Education & Workforce Dev.			Action Fund    \$50.00  <b>Total Due</b> <b>\$18,275.00</b>

<b>Pay by Check</b>	<b>Pay by Credit Card (select one)</b> VISA    MasterCard    American Express		
Amount: \$ _____	Card # _____	Exp. Date _____	
Check # _____	Signature (required) _____		

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-03**  
**Page 1 of 2**

**REQUEST:**

Provide a discussion regarding the type(s) of residential meters the Company uses, including whether AMI meters are being deployed, and/or whether modifications to existing meters are being made such as adding communication modules (for purposes of this question only, the term “advanced meters” applies to both such metering technologies). If so:

- a. Explain whether the deployment of advanced meters is on a system-wide basis, or whether the deployment is being made one meter at a time (i.e., when one existing meter needs to be replaced);
- b. Explain when the deployment of advanced meters began;
- c. Explain whether disconnects of gas service at residences with one or more types of advanced meters can be accomplished remotely, or whether they require on-site human intervention;
- d. Provide details regarding the make and model of advanced meters being deployed, including the estimated lifespan, and the duration of any applicable warranties;
- e. If the advanced meters require a communications module, explain whether a separate battery is required to enable the module to function, and if so, provide the estimated lifespan of the battery and any warranties applicable to the battery;
- f. Provide a discussion of the type of communications network the Company deployed to transmit the advanced meters’ data, and explain whether it is fully compatible with the Company’s existing customer service infrastructure;
- g. Provide a discussion of the type(s) of computer back-haul equipment and software the Company had to install in its offices to collect and analyze the data coming from the advanced meters;
- h. Explain whether Atmos monetizes its customers’ data derived from the Company’s metering infrastructure, even if on a de-identified, aggregate basis.

**RESPONSE:**

- a. The deployment of AMI/WMR in Kentucky has primarily been a combination of mass deployment, and sample meter program. Approximately 82% of all Kentucky meters are read via AMI/WMR as of July 2021.
- b. The deployment of AMI/WMR in Kentucky began November 2013.
- c. Atmos Energy has not deployed any meters with remote shut off.
- d. At this time, Atmos Energy does not use meters with integrated AMI/WMR. The index endpoint can be removed, replaced or added to most any meter that is an industry standard meter.

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-03**  
**Page 2 of 2**

- e. The Company utilizes Sensus endpoints. Sensus has models that are compatible with most meter indexes in use by the Company. The battery life is estimated at 25 years and warranty reflects such. The endpoint attached to the meter index has a lithium battery that powers a transmitter.
- f. RNI regional network interface collects the readings and the Company harvests the readings from that database. Reads come from antennas/base stations on various radio/cell towers.
- g. Reads are collected at the base station and transmitted from tower to RNI in Plano, Texas.
- h. The AMI/WMR endpoints only collect reads for the Company.

Respondent: Ryan Austin

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-04**  
**Page 1 of 1**

**REQUEST:**

Regarding mandated inline pipeline inspections (“ILI”), explain whether Atmos maintains contracts with external vendors for the necessary services and supplies to conduct and evaluate the required inspections, or whether the Company has the necessary in-house staffing and materials to perform these tasks.

- a. If Atmos does not perform these services in-house, explain whether the Company’s other LDC divisions, and/or the service company, have evaluated the costs and benefits of performing these tasks and services on a joint basis in order to obtain economies of scale. If so, provide copies of any relevant studies in this regard. If not, explain fully why not.
- b. Discuss the types of inspections that Atmos will be required to make, and the types of data it will collect for each such inspection. Explain also if inspection tools will be able to conduct multiple types of inspections in one run of the inspection tools, or if multiple runs will be required.
- c. Explain whether Atmos could achieve any cost savings by utilizing a multi-diameter smart pig inspection tool, either on a division-only basis or through sharing the multi-diameter tool(s) and their associated costs with the Company’s other LDC divisions.
- d. Provide a discussion regarding whether the Company will seek to coordinate its ILI activities with the affected cities in its service territory, in order to minimize traffic disruptions and costs associated with the inspections. Include in your discussion whether the Company is required to pay the costs for any potential re-paving of streets which may have to be excavated in order to conduct the inspections, and if so, whether such costs would be included in the PRP Rider.

**RESPONSE:**

Currently, none of our (AEC) lines are mandated to be ILI capable.

Respondent: Ryan Austin

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-05**  
**Page 1 of 1**

**REQUEST:**

Explain whether any portions of Atmos' service territory are designated as either Moderate Consequence Areas or High Consequence Areas for purposes of PHMSA. Explain the differences between the two statuses, and potential cost ramifications, if any.

**RESPONSE:**

The Company currently has no High Consequence Areas on its regulated system in Kentucky. The Company has identified several miles of Moderate Consequence Area lines, but since none of those lines are inline pipeline inspection (ILI) capable, the Company is not required to assess under the new rule.

The Company does have some mileage identified as being Class 3 that operate at greater than 30% of SMYS. Under the new rule, the Company will be required to assess these and will be doing so using ECDA / ICDA on a 10-year interval.

Respondent: Ryan Austin



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-06**  
**Page 1 of 1**

**REQUEST:**

Provide the Company's most recent capital spending projections for the next two years, and identify all capital projects.

**RESPONSE:**

Please see the relied file "Kentucky - CapEx 5 Year Plan - RATE CASE FILING.xlsx" attached to the Company's response to Staff DR No. 1-55.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-07**  
**Page 1 of 1**

**REQUEST:**

Does the Company use credit cards that include rebates? If the response is in the affirmative, provide the following items:

- a. Amount of rebate reflected in the cost of service for the base year and the forecasted period. If the amount is allocated, provide the allocations.
- b. Actual credit card rebates by year for 2019, 2020, and 2021 YTD. For each year, state the expense accounts where these credit card rebates are reflected and provide a detailed breakdown of those expense accounts.

**RESPONSE:**

Yes, the Company does receive rebates from use of PCARDS, T&E cards, and fuel cards.

- a. The fuel rebate is 100 basis points based on the monthly fuel volume after fuel transactions are reported. The PCARD and T&E rebate is as follows:

<b>Fiscal Year</b>	<b>Amount</b>
2019	\$132,268
2020	\$119,104
2021 (YTD)	\$65,377

The PCARD and T&E rebates are coded to the following:

010.1106.9210.07590.002000.0000 (Company.Cost Center.FERC.SubAcct.Service Area) and allocated as described in the Company's cost allocation manual. No adjustments have been made to per book amounts (6 months of base period) or FY 2021 budget (6 months of base period) therefore specifically identifiable information for the forecasted period is available beyond what is provided above.

- b. Please see the response to subpart (a).

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-08**  
**Page 1 of 1**

**REQUEST:**

Refer to the removal of Supplemental Executive Retirement Plan ("SERP") costs performed on Schedule F.9 related to employees at Divisions 02 and 91. Confirm that there were no SERP costs included in the test year O&M expenses related to employees at the Kentucky Division (09) or the Shared Services Division (12). If not confirmed, provide the amounts by division and the amounts directly incurred or allocated to the Kentucky Division.

**RESPONSE:**

Confirm, no SERP costs are recorded in Divisions 12 and 09. Please see the Direct Testimony, Page 43, Lines 4-12 of Mr. Christian.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-09**  
**Page 1 of 1**

**REQUEST:**

Confirm that Atmos, both in the instant filing and its pending Pipeline Replacement Program (“PRP”) filing, Case No. 2021-00304, is proposing to include Aldyl-A pipe replacement within its PRP mechanism.

**RESPONSE:**

Confirm.

Respondent: Brannon Taylor

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-10**  
**Page 1 of 1**

**REQUEST:**

Confirm that in the instant case, Atmos is proposing to make its Performance Based Ratemaking ("PBR") tariff permanent.

**RESPONSE:**

Deny. The Company is merely amending its tariff to remove the word "experimental." The Company's PBR renewal is pending before the Commission in Case No. 2020-00289 and is not part of this proceeding.

Respondent: Brannon Taylor

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-11**  
**Page 1 of 1**

**REQUEST:**

Reference Atmos' proposed new tariff sheet no. 42, the "Tax Act Adjustment Factor."  
Explain for how long of a period of time Atmos is proposing this tariff to remain in place.

**RESPONSE:**

The Company has not proposed an end date. The Company envisions the new tariff to remain permanently in place as a mechanism to react to changes in state and federal taxes subject to the Commission's discretion.

Respondent: Brannon Taylor

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-12**  
**Page 1 of 1**

**REQUEST:**

Provide Atmos' current monthly customer charge for Rate G-1, residential service. Reference also Atmos' public notice found at FR 17(4)(a)-(j), Attachment 1, which indicates the current residential customer charge is \$20.68.

- a. Confirm that the Commission's final order in Case No. 2018-00281, dated May 7, 2019, at p. 51 set the residential customer charge at \$19.30.
- b. Confirm further that Atmos' current tariff on file with the Commission provides that the residential monthly customer charge is \$19.30.

**RESPONSE:**

- a. Confirm.
- b. Confirm.

The Company's notice of the current residential charge also includes the current residential PRP charge of \$1.38.

Respondent: Brannon Taylor

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-13**  
**Page 1 of 1**

**REQUEST:**

Refer to FR\_16(7)(h)12, Attachment 1. Confirm that for the period 2021 to 2025, Atmos is forecasting an approximate 41.5% growth in rate base.

- a. Refer also to FR\_16(7)(h)14, ATTACHMENT 1. Confirm that for the period 2023-2025, Atmos forecasts its customer count will grow customer count is forecasted to grow from 181,565 to 182,915, or approximately 0.74%.
- b. Refer finally to FR\_16(7)(h)15, ATTACHMENT 1. Confirm that for the period 2023-2025, Atmos states that its Mcf sales forecast for the period 2021-2025 increases from 47.793 million Mcf to 47.909 million Mcf, an increase of approximately 0.24%.

**RESPONSE:**

Regarding FR\_16(7)(h)12, Attachment 1, for the period 2021 to 2025, Atmos Energy confirms that the forecast growth in rate base is approximately 41.6%.

- a. Regarding FR\_16(7)(h)14, Attachment 1, for the period 2023 to 2025, Atmos Energy confirms that the forecast growth for customer count is from 181,565 to 182,915, or approximately 0.74%.
- b. Regarding FR\_16(7)(h)15, Attachment 1, for the period 2023 to 2025, Atmos Energy confirms that forecast Mcf sales increase from 47.793 million Mcf to 47.910 million Mcf, or approximately 0.24%.

Respondent: Joe Christian



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-14**  
**Page 1 of 1**

**REQUEST:**

Identify each of the affiliates/subsidiaries of Atmos Energy Corporation, Inc. ("AEC") that comprise the affiliate group included in the AEC consolidated federal tax return.

**RESPONSE:**

Please see confidential Attachment 1.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-14\_Att1 - Federal Form 851 (CONFIDENTIAL).pdf, 4 Pages.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-15**  
**Page 1 of 1**

**REQUEST:**

Provide a schedule showing the history of the taxable income and losses for AEC in total and separated into utility, nonregulated, and other for each month, each quarter, each fiscal year, and each calendar year since January 2015 through the end of the test year in this proceeding. Indicate whether AEC maintains sufficiently detailed records to record the taxable income and losses by: i) utility, nonregulated, and other, and/or ii) rate division, or if these determinations must be determined after the fact.

**RESPONSE:**

Please see confidential Attachment 1 for a schedule of taxable income and losses by year separated into Utility, Nonregulated and other.

Please see Attachment 2 for a schedule to taxable income and losses by month and quarter separated by Utility, Nonregulated and other.

The Company confirms that sufficient details are maintained to record taxable income and losses by utility, nonregulated and other. This is determined through the filing of consolidated tax returns, which includes taxable income and loss calculations by both utility and nonregulated operations.

GAAP reporting requirements differ from tax return calculations of the NOL Carryforward ("NOLC"). These differences result in both increases and decreases to the Company's NOLC deferred tax asset recorded on the Company's books. These differences have resulted in a net increase to the Company's NOLC deferred tax asset recorded on its books. This net increase is reflected as Book/Tax Differences NOL on the NOL Carryforward Schedule and titled FD-NOL Credit Carryforward - Other in the referenced workpaper. This decrease has no impact on the Company's tax filings.

**ATTACHMENTS:**

ATTACHMENT 1 - AG\_1-15\_Att1 - NOL Rollforward (CONFIDENTIAL).xls, 1 Page.

ATTACHMENT 2 - AG\_1-15\_Att2 - NOL Rollforward ADIT.xlsx, 7 Pages.

Respondent: Joe Christian

KY 2021-00214 AG 1-15 ATTACHMENT 2  
Atmos Energy Corporation, Inc.  
ADIT NOL Carryforward Balances

Rate Division:  
002DIV

Adjustment Description	Category	Adj Code	Fiscal 2015	Fiscal 2015	Fiscal 2015	Fiscal 2015	Fiscal 2015	Fiscal 2015	Fiscal 2015	Fiscal 2015	Fiscal 2015	Fiscal 2015	Fiscal 2016	Fiscal 2016
			1/31/2015	2/28/2015	3/31/2015	4/30/2015	5/31/2015	6/30/2015	7/31/2015	8/31/2015	9/30/2015	10/31/2015	11/30/2015	
FD-NOL Credit Carryforward - Non Reg	TAX	TAX02NR	(219,650,879)	(219,650,879)	(224,875,942)	(224,875,942)	(224,875,942)	(227,845,749)	(227,845,749)	(227,845,749)	(227,845,749)	(223,209,326)	(223,209,326)	(223,209,326)
FD-NOL Credit Carryforward - Utility	TAX	TAX02U	469,818,580	469,818,580	425,654,746	425,654,746	425,654,746	407,851,903	407,851,903	407,851,903	407,851,903	530,457,730	530,457,730	530,457,730
URI FD-NOL Credit Carryforward - Utility	TAX	TAX02U												
FD-NOL Credit Carryforward - Other	TAX	TAX02OT	(2,947,398)	(2,947,398)	(2,330,152)	(2,330,152)	(2,330,152)	(2,330,152)	(2,330,152)	(2,330,152)	(2,330,152)	(8,887,801)	(8,887,801)	(8,887,801)
<b>Total NOL Carryforward</b>			<b>247,220,303</b>	<b>247,220,303</b>	<b>198,448,652</b>	<b>198,448,652</b>	<b>198,448,652</b>	<b>177,676,002</b>	<b>177,676,002</b>	<b>177,676,002</b>	<b>177,676,002</b>	<b>298,360,603</b>	<b>298,360,603</b>	<b>298,360,603</b>

KY 2021-00214 AG 1-15 ATTACHMENT 2  
Atmos Energy Corporation, Inc.  
ADIT NOL Carryforward Balances

Rate Division:  
002DIV

Adjustment Description	Fiscal 2016 12/31/2015	Fiscal 2016 1/31/2016	Fiscal 2016 2/28/2016	Fiscal 2016 3/31/2016	Fiscal 2016 4/30/2016	Fiscal 2016 5/31/2016	Fiscal 2016 6/30/2016	Fiscal 2016 7/31/2016	Fiscal 2016 8/31/2016	Fiscal 2016 9/30/2016	Fiscal 2017 10/31/2016	Fiscal 2017 11/30/2016	Fiscal 2017 12/31/2016
FD-NOL Credit Carryforward - Non Reg	(223,040,174)	(223,040,174)	(223,040,174)	(226,944,352)	(226,944,352)	(226,944,352)	(231,757,499)	(231,757,499)	(231,757,499)	(237,733,657)	(237,733,657)	(237,733,657)	(245,531,762)
FD-NOL Credit Carryforward - Utility	554,535,985	554,535,985	554,535,985	541,564,884	542,923,119	542,923,119	570,484,105	570,484,105	570,484,105	725,716,695	725,716,695	725,716,695	761,090,475
URI FD-NOL Credit Carryforward - Utility													
FD-NOL Credit Carryforward - Other	(8,887,801)	(8,887,801)	(8,887,801)	5,386,873	5,386,873	5,386,873	5,386,873	5,386,873	5,386,873	6,052,102	6,052,102	6,052,102	6,052,102
<b>Total NOL Carryforward</b>	<b>322,608,010</b>	<b>322,608,010</b>	<b>322,608,010</b>	<b>320,007,405</b>	<b>321,365,640</b>	<b>321,365,640</b>	<b>344,113,479</b>	<b>344,113,479</b>	<b>344,113,479</b>	<b>494,035,140</b>	<b>494,035,140</b>	<b>494,035,140</b>	<b>521,610,815</b>

KY 2021-00214 AG 1-15 ATTACHMENT 2  
Atmos Energy Corporation, Inc.  
ADIT NOL Carryforward Balances

Rate Division:  
002DIV

Adjustment Description	Fiscal 2017 1/31/2017	Fiscal 2017 2/28/2017	Fiscal 2017 3/31/2017	Fiscal 2017 4/30/2017	Fiscal 2017 5/31/2017	Fiscal 2017 6/30/2017	Fiscal 2017 7/31/2017	Fiscal 2017 8/31/2017	Fiscal 2017 9/30/2017	Fiscal 2018 10/31/2017	Fiscal 2018 11/30/2017	Fiscal 2018 12/31/2017	Fiscal 2018 1/31/2018
FD-NOL Credit Carryforward - Non Reg	(245,531,762)	(245,531,762)	(259,142,741)	(259,142,741)	(259,142,741)	(275,050,458)	(275,050,458)	(275,050,458)	(257,719,124)	(257,719,124)	(257,719,124)	(154,641,288)	(154,641,288)
FD-NOL Credit Carryforward - Utility	761,090,475	761,090,475	725,798,687	725,798,687	725,798,687	745,188,374	745,188,374	745,188,374	782,273,564	782,273,564	782,273,564	480,066,663	480,066,663
URI FD-NOL Credit Carryforward - Utility													
FD-NOL Credit Carryforward - Other	6,052,102	6,052,102	6,052,102	6,052,102	6,052,102	6,052,102	6,052,102	6,052,102	8,302,077	8,302,077	8,302,077	4,981,246	4,981,246
<b>Total NOL Carryforward</b>	<b>521,610,815</b>	<b>521,610,815</b>	<b>472,708,048</b>	<b>472,708,048</b>	<b>472,708,048</b>	<b>476,190,017</b>	<b>476,190,017</b>	<b>476,190,017</b>	<b>532,856,517</b>	<b>532,856,517</b>	<b>532,856,517</b>	<b>330,406,621</b>	<b>330,406,621</b>

KY 2021-00214 AG 1-15 ATTACHMENT 2  
Atmos Energy Corporation, Inc.  
ADIT NOL Carryforward Balances

Rate Division:  
002DIV

Adjustment Description	Fiscal 2018 2/28/2018	Fiscal 2018 3/31/2018	Fiscal 2018 4/30/2018	Fiscal 2018 5/31/2018	Fiscal 2018 6/30/2018	Fiscal 2018 7/31/2018	Fiscal 2018 8/31/2018	Fiscal 2018 9/30/2018	Fiscal 2019 10/31/2018	Fiscal 2019 11/30/2018	Fiscal 2019 12/31/2018	Fiscal 2019 1/31/2019
FD-NOL Credit Carryforward - Non Reg	(154,641,288)	(155,666,879)	(155,666,879)	(155,666,879)	(156,740,712)	(156,740,712)	(156,740,712)	(159,685,814)	(159,685,814)	(159,685,814)	(160,946,626)	(160,946,626)
FD-NOL Credit Carryforward - Utility	480,066,663	425,350,912	425,350,912	425,350,912	422,509,065	422,509,065	422,509,065	584,225,267	584,225,267	584,225,267	617,072,455	617,072,455
URI FD-NOL Credit Carryforward - Utility												
FD-NOL Credit Carryforward - Other	4,981,246	4,981,246	4,981,246	4,981,246	4,981,246	4,981,246	4,981,246	5,502,949	5,502,949	5,502,949	5,502,949	5,502,949
<b>Total NOL Carryforward</b>	<b>330,406,621</b>	<b>274,665,279</b>	<b>274,665,279</b>	<b>274,665,279</b>	<b>270,749,599</b>	<b>270,749,599</b>	<b>270,749,599</b>	<b>430,042,402</b>	<b>430,042,402</b>	<b>430,042,402</b>	<b>461,628,778</b>	<b>461,628,778</b>

KY 2021-00214 AG 1-15 ATTACHMENT 2  
Atmos Energy Corporation, Inc.  
ADIT NOL Carryforward Balances

Rate Division:  
002DIV

Adjustment Description	Fiscal 2019 2/28/2019	Fiscal 2019 3/31/2019	Fiscal 2019 4/30/2019	Fiscal 2019 5/31/2019	Fiscal 2019 6/30/2019	Fiscal 2019 7/31/2019	Fiscal 2019 8/31/2019	Fiscal 2019 9/30/2019	Fiscal 2020 10/31/2019	Fiscal 2020 11/30/2019	Fiscal 2020 12/31/2019	Fiscal 2020 1/31/2020	Fiscal 2020 2/29/2020
FD-NOL Credit Carryforward - Non Reg	(160,946,626)	(162,466,414)	(162,466,414)	(162,466,414)	(163,669,568)	(163,669,568)	(163,669,568)	(163,981,747)	(163,981,747)	(163,981,747)	(165,616,606)	(165,616,606)	(165,616,606)
FD-NOL Credit Carryforward - Utility	617,072,455	589,212,411	589,212,411	589,212,411	586,870,622	586,870,622	586,870,622	609,990,361	609,990,361	609,990,361	613,554,225	613,554,225	613,554,225
URI FD-NOL Credit Carryforward - Utility													
FD-NOL Credit Carryforward - Other	5,502,949	5,502,949	5,502,949	5,502,949	5,502,949	5,502,949	5,502,949	5,820,648	5,820,648	5,820,648	5,820,648	5,820,648	5,820,648
<b>Total NOL Carryforward</b>	<b>461,628,778</b>	<b>432,248,946</b>	<b>432,248,946</b>	<b>432,248,946</b>	<b>428,704,003</b>	<b>428,704,003</b>	<b>428,704,003</b>	<b>451,829,262</b>	<b>451,829,262</b>	<b>451,829,262</b>	<b>453,758,267</b>	<b>453,758,267</b>	<b>453,758,267</b>

KY 2021-00214 AG 1-15 ATTACHMENT 2  
Atmos Energy Corporation, Inc.  
ADIT NOL Carryforward Balances

Rate Division:  
002DIV

Adjustment Description	Fiscal 2020 3/31/2020	Fiscal 2020 4/30/2020	Fiscal 2020 5/31/2020	Fiscal 2020 6/30/2020	Fiscal 2020 7/31/2020	Fiscal 2020 8/31/2020	Fiscal 2020 9/30/2020	Fiscal 2021 10/31/2020	Fiscal 2021 11/30/2020	Fiscal 2021 12/31/2020	Fiscal 2021 1/31/2021	Fiscal 2021 2/28/2021	Fiscal 2021 3/31/2021
FD-NOL Credit Carryforward - Non Reg	(166,582,236)	(166,582,236)	(166,582,236)	(167,612,536)	(167,612,536)	(167,612,536)	(168,088,174)	(168,088,174)	(168,088,174)	(169,285,085)	(169,285,085)	(169,285,085)	(170,609,458)
FD-NOL Credit Carryforward - Utility	576,886,666	576,886,666	576,886,666	586,992,749	586,992,749	586,992,749	608,544,074	608,544,074	608,544,074	598,045,312	598,045,312	598,045,312	537,424,569
URI FD-NOL Credit Carryforward - Utility													439,642,155
FD-NOL Credit Carryforward - Other	5,814,928	5,814,928	5,814,928	5,814,928	5,814,928	5,814,928	6,493,433	6,493,433	6,493,433	6,660,598	6,660,598	6,660,598	6,660,598
<b>Total NOL Carryforward</b>	<b>416,119,358</b>	<b>416,119,358</b>	<b>416,119,358</b>	<b>425,195,141</b>	<b>425,195,141</b>	<b>425,195,141</b>	<b>446,949,333</b>	<b>446,949,333</b>	<b>446,949,333</b>	<b>435,420,825</b>	<b>435,420,825</b>	<b>435,420,825</b>	<b>813,117,864</b>



KY 2021-00214 AG 1-15 ATTACHMENT 2  
Atmos Energy Corporation, Inc.  
ADIT NOL Carryforward Balances

Rate Division:  
002DIV

Adjustment Description	Fiscal 2021	Fiscal 2021	Fiscal 2021
	4/30/2021	5/31/2021	6/30/2021
FD-NOL Credit Carryforward - Non Reg	(170,609,458)	(170,609,458)	(171,811,030)
FD-NOL Credit Carryforward - Utility	537,424,569	537,424,569	530,205,732
URI FD-NOL Credit Carryforward - Utility	439,642,155	439,642,155	439,642,155
FD-NOL Credit Carryforward - Other	6,660,598	6,660,598	6,660,598
<b>Total NOL Carryforward</b>	<b>813,117,864</b>	<b>813,117,864</b>	<b>804,697,455</b>

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-16**  
**Page 1 of 1**

**REQUEST:**

Indicate what efforts are taken by AEC to track temporary differences, and thus, taxable losses and the related asset NOL ADIT, due to identifiable events, such as specific storms, that affect specific rate divisions and for which it tracks and assigns the related liability deferred tax for the same identifiable event. Provide a copy of all documentation of this process, if any. If none, then so state.

**RESPONSE:**

When a temporary difference is related to one off events and can be specifically identified, the Company isolates these items and records at the applicable rate division. For the period included in this rate filing there have been no one off specific events that have been allocated to Kentucky.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-17**  
**Page 1 of 1**

**REQUEST:**

If there is a temporary difference due to an identifiable event, such as a specific storm, confirm that the Company agrees that the taxable losses and the related effects on the AEC liability ADIT and the offsetting asset NOL carryforward ADIT should be assigned to the same rate division, not assigned or allocated to rate divisions in a disparate manner. If denied, then explain why the Company disagrees with this premise. Provide all authoritative support for your response.

**RESPONSE:**

The Company agrees to the extent the consistency rule is not violated under section 168(i)(9)(B), that temporary differences relating to specific one-off events can be identified and assigned to that applicable rate division.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-18**  
**Page 1 of 1**

**REQUEST:**

Describe how AEC calculates and records changes in the NOL carryforward and related ADIT each month and each quarter throughout its fiscal year. Provide a copy of all documentation of this process. If it relies on an estimate of fiscal year taxable income or loss at the beginning of the year, then describe how it makes this estimate and how it records the effects and/or changes and/or true-ups of this estimate throughout the fiscal year. Provide a copy of all documentation of this process.

**RESPONSE:**

Fiscal Year ADIT and NOL carryforwards are recorded as estimates based on the underlying balance sheet accounts at each rate division. Actual amounts are used whenever possible to calculate deferred taxes, except when information is not yet available, as is the case with adjustments requiring payments made after year-end and certain plant information not yet available. In these instances, estimates are made based on prior period data. At year end, the increase or decrease to federal and state NOL carryforward assets is calculated and recorded by computing federal and state taxable income using actual pre-tax book income and calculated permanent and temporary (deferred) adjustments.

Quarterly ADIT and NOL carryforwards are recorded as estimates based on the underlying balance sheet accounts for each rate division. Actual amounts are used whenever possible to calculate deferred taxes expect when information is not yet available. In these instances, estimates are made based on prior year data. Due to time constraints, the estimates done based on underlying balance sheet accounts are made using the account balances as of the prior month.

Monthly ADIT and NOL carryforwards are recorded using the effective tax rate calculated at the most recent quarter end to monthly activity of pretax book income at each business unit. Changes in deferred items are not calculated or recorded at non quarter end months except for the amortization of excess deferred income tax due to TCJA and changes to other comprehensive income ("OCI").

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-19**  
**Page 1 of 2**

**REQUEST:**

Refer to the electronic workpaper "ADIT\_for\_KY\_04-30-21" provided in response to the Staff's First Set of Data Requests. Refer further to cell rows 58, 59 and 60 on worksheet tab "ADIT 002" that provide the account 190 ADIT amounts for "FD-NOL Credit Carryforward – Non Reg", "FD-NOL Credit Carryforward – Utility", and "FD-NOL Credit Carryforward – Other", respectively.

- a. Provide a detailed description of the methodology used to disaggregate or separately determine the actual and projected NOL carryforward amounts for utility, nonregulated, and other.
- b. Provide copies of all supporting documentation used to quantify the actual NOL carryforward amounts in fiscal years 2019, 2020, the base year, and the test year, including a copy of all Excel spreadsheets in live format and with all formulas intact.
- c. Provide the actual balances for each of the account 190 ADIT amounts by temporary difference for each of the months starting January 2019 through the most recent month with actual data. This is a continuing request through the pendency of this proceeding.
- d. Provide a projection by month of the Atmos Energy and the Kentucky allocation of the FD-NOL Credit Carryforward-Utility from the end of fiscal year 2020 through the end of fiscal year 2023. Show the actual balances from the end of fiscal year 2020 through the most current month with available data and projected balances thereafter. Provide all assumptions and calculations, including electronic spreadsheets in live format with all formulas intact.
- e. Provide a breakdown of the NOL Carryforward utilization and resulting effects on the account 190 ADIT balance for the year ended September 30, 2020 amongst the listed accounts.

**RESPONSE:**

- a. Actual NOL carryforward amounts are derived from the Company's tax filings. Atmos Energy files a consolidated tax return, which includes both utility and non-regulated operations. The utility NOL represents that portion of the consolidated net operating loss resulting from utility operations. Utility operations are all included in one single legal entity, Atmos Energy Corporation. In preparing the consolidated tax return, a separate calculation of taxable income for each legal entity is made. Therefore it is possible to isolate the amount of losses generated by the utility operations by referring to the taxable income of Atmos Energy Corporation.

GAAP reporting requirements differ from tax return calculations of the NOL Carryforward ("NOLC"). These differences result in both increases and decreases to the Company's NOLC deferred tax asset recorded on the Company's books. These differences have resulted in a net increase to the Company's NOLC deferred tax asset recorded on its books. This net increase is reflected as Book/Tax Differences NOL on the NOL Carryforward Schedule and titled FD-NOL Credit Carryforward - Other in the referenced workpaper. This decrease has no impact on the Company's tax filings.

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-19**  
**Page 2 of 2**

The Company has projected net operating losses for the test period included in this filing. To the extent that the Company's deferred tax liabilities exceed income tax expense computed at the composite rate in the filing, the Company has projected additional net operating loss carryforward. To the extent that the Company's deferred tax liabilities do not exceed income tax expense computed at the composite rate in the filing, the Company has projected a decrease in net operating loss carryforward.

- b. The NOL carryforward amount generated in fiscal years 2019 and utilized in 2020 are reported on the schedule provided in the Company's response to AG DR No. 1-15 and is supported by the 9/30/2020 federal tax return provided in the Company's response to Staff DR No. 1-16. The consolidated NOL carryforward balances of \$445,657,653 and \$190,168,651 can be found on page 123 of the attachment. The fiscal year 2020 NOL carryforward/utilization for the nonregulated operations is the sum of taxable loss/income for all other entities in the consolidated group and can be found by summing the taxable income of all other entities listed on pages 97 and 98 of the attachment.

There is no forecasted change in NOLC for 9/30/2021. It is held constant from 3/31/2021, which was the final date for actuals included in the filing.

- c. Please see Attachment 1.
- d. The Company does not have projections or data responsive to this question. The Company no longer projects taxable income for the consolidated group, Atmos Energy Corporation, Inc. and Subsidiaries, for external financial statement audit purposes. As a result of the TCJA and the utility exception for 100% capital expensing, the Company does anticipate beginning to utilize its NOLC within the next few years. It is important to note that due to the provisions of the TCJA and the Company being a fiscal year-end filer, the Company was eligible for 100% expensing for its fiscal year ended September 30, 2018.
- e. Please refer to Attachment 1 to the Company's response to AG DR No. 1-15 for the NOL carryforward utilization that was calculated as part of the fiscal year 2020 federal return.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-19\_Att1 - ADIT for KY 6-30-21.xlsx, 16 Pages.

Respondent: Joe Christian

KY 2021-00214 AG 1-19 Attachment 1  
Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Rate Division:  
002DIV

Adjustment Description	Account	Category	Adj Code	Fiscal 2019 1/31/2019	Fiscal 2019 2/28/2019	Fiscal 2019 3/31/2019	Fiscal 2019 4/30/2019	Fiscal 2019 5/31/2019	Fiscal 2019 6/30/2019	Fiscal 2019 7/31/2019	Fiscal 2019 8/31/2019	Fiscal 2019 9/30/2019	Fiscal 2020 10/31/2019	Fiscal 2020 11/30/2019	Fiscal 2020 12/31/2019	Fiscal 2020 1/31/2020	Fiscal 2020 2/29/2020
Environmental Activities	2830	ACC	ACC01	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ad Valorem Taxes	2830	ACC	ACC02	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Directors Deferred Bonus	1900	ACC	ACC03	132,627	132,627	125,811	125,811	125,811	103,392	103,392	103,392	106,323	106,323	106,323	108,383	108,383	108,383
MIP/VPP Accrual	2830	ACC	ACC04	2,093,947	2,093,947	2,378,265	2,378,265	2,378,265	2,662,584	2,662,584	2,662,584	1,598,728	1,598,728	1,598,728	1,804,681	1,804,681	1,804,681
Accrued Environmental Asset	2830	ACC	ACC05	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Miscellaneous Accrued	1900	ACC	ACC06	289	289	-	-	-	5,992	5,992	5,992	2,199	2,199	2,199	1,092	1,092	1,092
Self Insurance - Adjustment	1900	ACC	ACC08	2,897,798	2,897,798	2,897,798	2,897,798	2,897,798	3,125,968	3,125,968	3,125,968	2,030,752	2,030,752	2,030,752	2,030,752	2,030,752	2,030,752
Vacation Accrual	1900	ACC	ACC11	-	-	19,270	19,270	19,270	(1,288)	(1,288)	(1,288)	-	-	-	-	-	-
Worker's Comp Insurance Reserve	1900	ACC	ACC12	72,558	72,558	71,455	71,455	71,455	70,459	70,459	70,459	71,640	71,640	71,640	71,163	71,163	71,163
Accrual - Subtotal	0	-	-	5,197,219	5,197,219	5,492,599	5,492,599	5,492,599	5,967,107	5,967,107	5,967,107	3,809,642	3,809,642	3,809,642	4,016,071	4,016,071	4,016,071
Rabbl Trust - True Up	1900	BEN	NBP01	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SERP Adjustment	Excl	BEN	NBP03	16,499,573	16,499,573	16,671,730	16,671,730	16,671,730	16,806,396	16,806,396	16,806,396	16,130,294	16,130,294	16,130,294	16,271,897	16,271,897	16,271,897
SERP DTL Offset	Excl	BEN	NBP04	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock Grant Plan	Excl	BEN	NBP05	10,229	10,229	10,229	10,229	10,229	10,229	10,229	10,229	10,229	10,229	10,229	10,229	10,229	10,229
Rabbl Trust	1900	BEN	NBP06	901,834	901,834	901,834	901,834	901,834	901,834	901,834	901,834	911,154	911,154	911,154	911,154	911,154	911,154
VEBA Trust Contribution Adjustment	1900	BEN	NBP08	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock - MIP	Excl	BEN	NBP13	9,450,594	9,450,594	9,450,594	9,450,594	9,450,594	9,450,594	9,450,594	9,450,594	9,450,594	9,450,594	9,450,594	9,450,594	9,450,594	9,450,594
Director's Stock Awards	Excl	BEN	NBP16	4,477,825	4,477,825	4,477,825	4,477,825	4,477,825	4,477,825	4,477,825	4,477,825	4,885,488	4,885,488	4,885,488	4,885,488	4,885,488	4,885,488
Director's Stock - Temp	2830	BEN	NBP18	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pension Expense	2830	BEN	PNB01	(6,494,865)	(6,494,865)	(5,758,094)	(5,758,094)	(5,758,094)	(5,023,124)	(5,023,124)	(5,023,124)	(4,384,218)	(4,384,218)	(4,384,218)	(3,735,588)	(3,735,588)	(3,735,588)
FAS106 Adjustment	1900	BEN	PRB01	5,881,243	5,881,243	5,898,917	5,898,917	5,898,917	5,920,476	5,920,476	5,920,476	5,947,460	5,947,460	5,947,460	5,915,344	5,915,344	5,915,344
Benefits - Subtotal	0	-	-	30,726,433	30,726,433	31,652,135	31,652,135	31,652,135	32,544,230	32,544,230	32,544,230	32,951,001	32,951,001	32,951,001	33,709,118	33,709,118	33,709,118
CWIP	Excl	CWIP/RWIP	FXA26	(2,038,243)	(2,038,243)	(2,038,243)	(2,038,243)	(2,038,243)	(2,038,243)	(2,038,243)	(2,038,243)	(1,337,603)	(1,337,603)	(1,337,603)	(1,337,603)	(1,337,603)	(1,337,603)
RWIP	Excl	CWIP/RWIP	FXA47	(2,367)	(2,367)	(2,367)	(2,367)	(2,367)	(2,367)	(2,367)	(2,367)	(2,366)	(2,366)	(2,366)	(2,366)	(2,366)	(2,366)
CWIP/RWIP - Subtotal	0	-	-	(2,040,610)	(2,040,610)	(2,040,610)	(2,040,610)	(2,040,610)	(2,040,610)	(2,040,610)	(2,040,610)	(1,339,969)	(1,339,969)	(1,339,969)	(1,339,969)	(1,339,969)	(1,339,969)
Fixed Asset Cost Adjustment	2820	FXA	FXA01	(23,901,076)	(23,901,076)	(24,328,748)	(24,328,748)	(24,328,748)	(24,756,420)	(24,756,420)	(24,756,420)	(23,039,537)	(23,039,537)	(23,039,537)	(23,372,841)	(23,372,841)	(23,372,841)
Depreciation Adjustment	2820	FXA	FXA02	6,308,331	6,308,331	5,824,377	5,824,377	5,824,377	4,945,228	4,945,228	4,945,228	6,275,597	6,275,597	6,275,597	6,191,994	6,191,994	6,191,994
Book Gain/Loss on Sale of Fixed Assets	2820	FXA	FXA03	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	2820	FXA	FXA04	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(b) Cushion Gas	2820	FXA	FXA13	343,370	343,370	343,370	343,370	343,370	343,370	343,370	343,370	343,370	343,370	343,370	343,370	343,370	343,370
Section 481(a) Line Pack Gas	2820	FXA	FXA14	41,663	41,663	41,663	41,663	41,663	41,663	41,663	41,663	41,663	41,663	41,663	41,663	41,663	41,663
IRS Audit Assessment - Cost	2820	FXA	FXA15	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Accum	2820	FXA	FXA16	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repair % Completion Allowance	2820	FXA	FXA41	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(b) TRP	2820	FXA	FXA46	-	-	-	-	-	-	-	-	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj	2820	FXA	FXA80	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Plant - Subtotal	0	-	-	(17,207,712)	(17,207,712)	(18,119,338)	(18,119,338)	(18,119,338)	(19,426,159)	(19,426,159)	(19,426,159)	(16,378,907)	(16,378,907)	(16,378,907)	(16,795,814)	(16,795,814)	(16,795,814)
Deferred Gas Costs	Excl	GCA	GCA01	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Over Recoveries of PGA	Excl	GCA	GCA03	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PGA - Amended Item	Excl	GCA	GCA04	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Cost Adjustment - Subtotal	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LGS - Goodwill Amortization	2830	GDW	ONT13	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TXU - Goodwill Amortization	2830	GDW	ONT49	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Goodwill - Subtotal	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer Advances	1900	ONT	CAP01	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-13523	2830	ONT	DTE01	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Expense Projects	2830	ONT	DTE09	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-14155	2830	ONT	DTE12	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Projects - TXU Acquisition	1900	ONT	DTE14	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Amortized	1900	ONT	DVA05	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Capitalized	2830	ONT	DVA06	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Assets	2830	ONT	DVA10	-	-	-	-	-	-	-	-	-	-	-	(11,903,548)	(11,903,548)	(11,903,548)
DIG on Fixed Assets	1900	ONT	DVA16	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	2830	ONT	DVA18	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - WKG	1900	ONT	DVA19	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Liabilities	2830	ONT	DVA20	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 86/90 Lease Expense Amortiz.	2830	ONT	DVA26	-	-	-	-	-	-	-	-	-	-	-	11,418,392	11,418,392	11,418,392
MVG Right of Way	2830	ONT	DVA35	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - Comfurl Goodwill	2830	ONT	DVA57	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - GGC	1900	ONT	ITC01	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - UCG Non-Utility	1900	ONT	ITC02	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - UCG	1900	ONT	ITC03	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - MVG	1900	ONT	ITC04	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Regulatory Liability - GGC	1900	ONT	ITC05	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Capitalized Selling Expense	1900	ONT	NTE03	-	-	-	-	-	-	-	-	-	-	-	-	-	-
UNICAP Section 263A Costs	1900	ONT	NTE11	-	-	-	-	-	-	-	-	-	-	-	-	-	-
481(a) UNICAP	1900	ONT	NTE15	-	-	-	-	-	-	-	-	-	-	-	-	-	-
UNICAP - IRS Audit	1900	ONT	NTE19	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Allowance for Doubtful Accounts	1900	ONT	ONT02	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Clearing Account - Adjustment	1900	ONT	ONT03	-	-	70	70	70	667	667	667	-	-	-	-	-	-
Charitable Contribution Carryover	1900	ONT	ONT04	5,290,312	5,290,312	5,290,312	5,290,312	5,290,312	5,290,312	5,290,312	5,290,312	5,336,540	5,336,540	5,336,540	4,478,356	4,478,356	4,478,356
RAR CFWE 1990-1985	2830	ONT	ONT06	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Union Gas - Non Compete	1900	ONT	ONT21	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Monarch - Non Compete	1900	ONT	ONT22	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Palmyra - Non Compete	1900	ONT	ONT23	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Prepayments	1900	ONT	ONT31	(5,436,598)	(5,436,598)	(5,245,654)	(5,245,654)	(5,245,654)	(5,834,989)	(5,834,989)	(5,834,989)	(5,121,942)	(5,121,942)	(5,121,942)	(5,146,229)	(5,146,229)	(5,146,229)
Rate Case Accrual	2830	ONT	ONT32	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Research and Development Expenses	1900	ONT	ONT33	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Partnership Investment - Unitary	1900	ONT	ONT37	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Inventory Adjustment	1900	ONT	ONT44	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Stock Option Expense	1900	ONT	ONT50	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Prepayments - MVG	2830	ONT	ONT51	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WACOG to FIFO Adjustment	2830	ONT															









KY 2021-00214 AG 1-19 Attachment 1  
Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Rate Division:  
012DIV

Adjustment Description	Category	Adj Code	Fiscal 2019 1/31/2019	Fiscal 2019 2/28/2019	Fiscal 2019 3/31/2019	Fiscal 2019 4/30/2019	Fiscal 2019 5/31/2019	Fiscal 2019 6/30/2019	Fiscal 2019 7/31/2019	Fiscal 2019 8/31/2019	Fiscal 2019 9/30/2019	Fiscal 2020 10/31/2019	Fiscal 2020 11/30/2019	Fiscal 2020 12/31/2019	Fiscal 2020 1/31/2020	Fiscal 2020 2/29/2020
Environmental Activities	2830	ACC	ACC01	-	-	-	-	-	-	-	-	-	-	-	-	-
Ad Valorem Taxes	2830	ACC	ACC02	-	-	-	-	-	-	-	-	-	-	-	-	-
Directors Deferred Bonus	1900	ACC	ACC03	-	-	-	-	-	-	-	-	-	-	-	-	-
MIP/VPP Accrual	2830	ACC	ACC04	(1,189,274)	(1,189,274)	(1,320,848)	(1,320,848)	(1,320,848)	(1,452,422)	(1,452,422)	(1,452,422)	(1,143,743)	(1,143,743)	(1,143,743)	(1,288,961)	(1,288,961)
Accrued Environmental Asset	2830	ACC	ACC05	-	-	-	-	-	-	-	-	-	-	-	-	-
Miscellaneous Accrued	2830	ACC	ACC06	-	-	-	-	-	-	-	-	-	-	-	-	-
Self Insurance - Adjustment	1900	ACC	ACC08	-	-	-	-	-	-	-	-	-	-	-	-	-
Vacation Accrual	1900	ACC	ACC11	-	-	3,669	3,669	3,669	(9,526)	(9,526)	(9,526)	-	-	-	-	-
Worker's Comp Insurance Reserve	1900	ACC	ACC12	222	222	255	255	255	313	313	313	359	359	359	362	362
<b>Accrual - Subtotal</b>				<b>(1,189,052)</b>	<b>(1,189,052)</b>	<b>(1,316,924)</b>	<b>(1,316,924)</b>	<b>(1,316,924)</b>	<b>(1,461,635)</b>	<b>(1,461,635)</b>	<b>(1,461,635)</b>	<b>(1,143,384)</b>	<b>(1,143,384)</b>	<b>(1,143,384)</b>	<b>(1,288,599)</b>	<b>(1,288,599)</b>
Rabbi Trust - True Up	1900	BEN	NBP01	-	-	-	-	-	-	-	-	-	-	-	-	-
SEBP Adjustment	Excl	BEN	NBP03	-	-	-	-	-	-	-	-	-	-	-	-	-
SERP DTL Offset	Excl	BEN	NBP04	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock Grant Plan	Excl	BEN	NBP05	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust	1900	BEN	NBP06	-	-	-	-	-	-	-	-	-	-	-	-	-
VEBA Trust Contribution Adjustment	1900	BEN	NBP08	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock - MIP	Excl	BEN	NBP13	-	-	-	-	-	-	-	-	-	-	-	-	-
Director's Stock Awards	Excl	BEN	NBP16	-	-	-	-	-	-	-	-	-	-	-	-	-
Director's Stock - Temp	2830	BEN	NBP18	-	-	-	-	-	-	-	-	-	-	-	-	-
Pension Expense	2830	BEN	PN01	-	-	-	-	-	-	-	-	-	-	-	-	-
FAS106 Adjustment	1900	BEN	PR01	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Benefits - Subtotal</b>																
CWIP	Excl	CWIP/RWIP	FXA26	(627,317)	(627,317)	(627,317)	(627,317)	(627,317)	(627,317)	(627,317)	(627,317)	(408,656)	(408,656)	(408,656)	(408,656)	(408,656)
RWIP	Excl	CWIP/RWIP	FXA47	(86)	(86)	(86)	(86)	(86)	(86)	(86)	(86)	(86)	(86)	(86)	(86)	(86)
<b>CWIP/RWIP - Subtotal</b>				<b>(627,403)</b>	<b>(627,403)</b>	<b>(627,403)</b>	<b>(627,403)</b>	<b>(627,403)</b>	<b>(627,403)</b>	<b>(627,403)</b>	<b>(627,403)</b>	<b>(408,742)</b>	<b>(408,742)</b>	<b>(408,742)</b>	<b>(408,742)</b>	<b>(408,742)</b>
Fixed Asset Cost Adjustment	2820	FXA	FXA01	(24,668,118)	(24,668,118)	(24,792,840)	(24,792,840)	(24,792,840)	(24,917,562)	(24,917,562)	(24,917,562)	(21,676,554)	(21,676,554)	(21,676,554)	(21,804,652)	(21,804,652)
Depreciation Adjustment	2820	FXA	FXA02	8,294,043	8,294,043	7,921,297	7,921,297	7,921,297	7,735,173	7,735,173	7,735,173	6,262,768	6,262,768	6,262,768	6,563,093	6,563,093
Book Gain/Loss on Sale of Fixed Assets	2820	FXA	FXA03	-	-	-	-	-	-	-	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	2820	FXA	FXA04	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(b) Cution Gas	2820	FXA	FXA13	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Line Pack Gas	2820	FXA	FXA14	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Cost	2820	FXA	FXA15	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Accum	2820	FXA	FXA16	-	-	-	-	-	-	-	-	-	-	-	-	-
Repair % Completion Allowance	2820	FXA	FXA41	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(b) TR	2820	FXA	FXA46	-	-	-	-	-	-	-	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj	2820	FXA	FXA80	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Plant - Subtotal</b>				<b>(16,374,075)</b>	<b>(16,374,075)</b>	<b>(16,871,543)</b>	<b>(16,871,543)</b>	<b>(16,871,543)</b>	<b>(17,182,389)</b>	<b>(17,182,389)</b>	<b>(17,182,389)</b>	<b>(15,413,786)</b>	<b>(15,413,786)</b>	<b>(15,413,786)</b>	<b>(15,241,559)</b>	<b>(15,241,559)</b>
Deferred Gas Costs	Excl	GCA	GCA01	-	-	-	-	-	-	-	-	-	-	-	-	-
Over Recoveries of PGA	Excl	GCA	GCA03	-	-	-	-	-	-	-	-	-	-	-	-	-
PGA - Amended Item	Excl	GCA	GCA04	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Gas Cost Adjustment - Subtotal</b>																
<b>Goodwill - Subtotal</b>																
Customer Advances	1900	ONT	CAP01	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-13523	2830	ONT	DTE01	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Expense Projects	2830	ONT	DTE09	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-14155	2830	ONT	DTE12	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Projects - TXU Acquisition	1900	ONT	DTE14	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Amortized	1900	ONT	DVA05	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Capitalized	2830	ONT	DVA06	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Assets	2830	ONT	DVA10	-	-	-	-	-	-	-	-	-	-	-	(2,471,762)	(2,471,762)
DIG on Fixed Assets	1900	ONT	DVA16	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	2830	ONT	DVA18	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - WKG	1900	ONT	DVA19	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Liabilities	2830	ONT	DVA20	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 86/90 Lease Expense Amortiz.	2830	ONT	DVA26	-	-	-	-	-	-	-	-	-	-	-	2,483,101	2,483,101
MVG Right of Way	2830	ONT	DVA35	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - ComfurT Goodwill	2830	ONT	DVA37	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - GGC	1900	ONT	ITC01	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - UCG Non-Utility	1900	ONT	ITC02	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - UCG	1900	ONT	ITC03	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - MVG	1900	ONT	ITC04	-	-	-	-	-	-	-	-	-	-	-	-	-
Regulatory Liability - GGC	1900	ONT	ITC05	-	-	-	-	-	-	-	-	-	-	-	-	-
Capitalized Selling Expense	1900	ONT	NTE03	-	-	-	-	-	-	-	-	-	-	-	-	-
UNICAP Section 263A Costs	1900	ONT	NTE11	-	-	-	-	-	-	-	-	-	-	-	-	-
481(b) UNICAP	1900	ONT	NTE15	-	-	-	-	-	-	-	-	-	-	-	-	-
UNICAP - IRS Audit	1900	ONT	NTE19	-	-	-	-	-	-	-	-	-	-	-	-	-
Allowance for Doubtful Accounts	1900	ONT	ONT02	-	-	-	-	-	-	-	-	-	-	-	-	-
Clearing Account - Adjustment	1900	ONT	ONT03	-	-	-	-	-	-	-	-	-	-	-	-	-
Charitable Contribution Carryover	Excl	ONT	ONT04	-	-	1,141	1,141	1,141	1,141	1,141	1,141	1,597	1,597	1,597	1,597	1,597
RAR C/WE 1990-1985	2830	ONT	ONT06	-	-	-	-	-	-	-	-	-	-	-	-	-
Union Gas - Non Compete	1900	ONT	ONT21	-	-	-	-	-	-	-	-	-	-	-	-	-
Monarch - Non Compete	1900	ONT	ONT22	-	-	-	-	-	-	-	-	-	-	-	-	-
Palmyra - Non Compete	1900	ONT	ONT23	-	-	-	-	-	-	-	-	-	-	-	-	-
Prepayments	Excl	ONT	ONT31	(607,056)	(607,056)	(621,997)	(621,997)	(621,997)	(387,816)	(387,816)	(387,816)	(321,133)	(321,133)	(321,133)	(808,047)	(808,047)
Rate Case Accrual	2830	ONT	ONT32	-	-	-	-	-	-	-	-	-	-	-	-	-
Research and Development Expenses	1900	ONT	ONT33	-	-	-	-	-	-	-	-	-	-	-	-	-
Partnership Investment - Unitary	1900	ONT	ONT37	-	-	-	-	-	-	-	-	-	-	-	-	-
Inventory Adjustment	1900	ONT	ONT44	-	-	-	-	-	-	-	-	-	-	-	-	-
Stock Option Expense	1900	ONT	ONT50	-	-	-	-	-	-	-	-	-	-	-	-	-
Prepayments - MVG	2830	ONT	ONT51	-	-	-	-	-	-	-	-	-	-	-	-	-
WACOG to FIFO Adjustment	2830	ONT	ONT52	-	-	-	-	-	-	-	-	-	-	-	-	-
Tax Free Interest - Temp	1900	ONT	ONT58	-	-	-	-	-	-	-	-	-	-	-	-	-
Federal & State Tax Interest	2830	ONT	ONT61	-	-	-	-	-	-	-	-	-	-	-	-	-
Prepayments - IRS Audits	1900	ONT	ONT64	-	-	-	-	-	-	-	-	-	-	-	-	-
Reg Asset Benefit Accrual	1900	ONT	ONT68	-	-	-	-	-	-	-	-	-	-	-	-	-
TX Rule 8.209 Reg Asset Deferral	1900	ONT	ONT69	-	-	-	-	-	-	-	-	-	-	-	-	-
LA SIP Reg Asset	1900	ONT	ONT70	-	-											



KY 2021-00214 AG 1-19 Attachment 1  
Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Rate Division:  
012DIV

Adjustment Description	Fiscal 2020 3/31/2020	Fiscal 2020 4/30/2020	Fiscal 2020 5/31/2020	Fiscal 2020 6/30/2020	Fiscal 2020 7/31/2020	Fiscal 2020 8/31/2020	Fiscal 2020 9/30/2020	Fiscal 2021 10/31/2020	Fiscal 2021 11/30/2020	Fiscal 2021 12/31/2020	Fiscal 2021 1/31/2021	Fiscal 2021 2/28/2021	Fiscal 2021 3/31/2021	Fiscal 2021 4/30/2021	Fiscal 2021 5/31/2021	Fiscal 2021 6/30/2021
Environmental Activities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ad Valorem Taxes	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Directors Deferred Bonus	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MIP/VPP Accrual	(1,434,179)	(1,434,179)	(1,434,179)	(1,552,055)	(1,552,055)	(1,552,055)	(638,291)	(638,291)	(638,291)	(495,587)	(495,587)	(495,587)	(352,883)	(352,883)	(352,883)	(210,179)
Accrued Environmental Asset	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Miscellaneous Accrued	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Self Insurance - Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Vacation Accrual	-	-	-	15,277	15,277	15,277	22,232	22,232	22,232	22,232	22,232	22,232	35,508	35,508	35,508	35,508
Worker's Comp Insurance Reserve	368	368	368	372	372	372	416	416	416	435	435	435	443	443	443	455
Accrual - Subtotal	(1,433,811)	(1,433,811)	(1,433,811)	(1,536,406)	(1,536,406)	(1,536,406)	(615,643)	(615,643)	(615,643)	(472,920)	(472,920)	(472,920)	(316,932)	(316,932)	(316,932)	(174,216)
Rabbi Trust - True Up	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SEBP Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SERP DTL Offset	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock Grant Plan	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VEBA Trust Contribution Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock - MIP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Director's Stock Awards	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Director's Stock - Temp	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pension Expense	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FAS106 Adjustment	-	-	-	-	-	-	-	(339,011)	(339,011)	(339,011)	(423,876)	(423,876)	(423,876)	(509,556)	(509,556)	(509,556)
Benefits - Subtotal	-	-	-	-	-	-	-	(339,011)	(339,011)	(339,011)	(423,876)	(423,876)	(423,876)	(509,556)	(509,556)	(509,556)
CWIP	(408,656)	(408,656)	(408,656)	(401,582)	(401,582)	(401,582)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)
RWIP	(86)	(86)	(86)	(84)	(84)	(84)	-	-	-	-	-	-	-	-	-	-
CWIP/RWIP - Subtotal	(408,742)	(408,742)	(408,742)	(401,666)	(401,666)	(401,666)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)	(60,748)
Fixed Asset Cost Adjustment	(21,932,749)	(21,932,749)	(21,932,749)	(21,678,938)	(21,678,938)	(21,678,938)	(21,765,784)	(21,765,784)	(21,765,784)	(21,808,597)	(21,808,597)	(21,808,597)	(21,851,409)	(21,851,409)	(21,851,409)	(21,894,221)
Depreciation Adjustment	6,918,890	6,918,890	6,918,890	7,270,097	7,270,097	7,270,097	7,676,717	7,676,717	7,676,717	8,134,715	8,134,715	8,134,715	8,517,827	8,517,827	8,517,827	8,918,276
Book Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(b) Cushion Gas	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Line Pack Gas	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Cost	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Accum	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repair % Completion Allowance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(b) TPR	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Plant - Subtotal	(15,013,859)	(15,013,859)	(15,013,859)	(14,408,841)	(14,408,841)	(14,408,841)	(14,089,067)	(14,089,067)	(14,089,067)	(13,673,882)	(13,673,882)	(13,673,882)	(13,333,582)	(13,333,582)	(13,333,582)	(12,975,845)
Deferred Gas Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Over Recoveries of PGA	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PGA - Amended Item	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gas Cost Adjustment - Subtotal	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Goodwill - Subtotal	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer Advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-13523	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Expense Projects	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-14155	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Projects - TXU Acquisition	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Amortized	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Capitalized	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Assets	(2,542,062)	(2,542,062)	(2,542,062)	(2,742,695)	(2,742,695)	(2,742,695)	(2,709,007)	(2,709,007)	(2,709,007)	(2,692,047)	(2,692,047)	(2,692,047)	(2,666,574)	(2,666,574)	(2,666,574)	(2,615,012)
DIG on Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - WKG	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Liabilities	2,542,062	2,542,062	2,542,062	2,742,695	2,742,695	2,742,695	2,709,007	2,709,007	2,709,007	2,692,047	2,692,047	2,692,047	2,666,574	2,666,574	2,666,574	2,615,012
RAR 86/90 Lease Expense Amortiz.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MVG Right of Way	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - ComfurT Goodwill	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - GGC	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - UCG Non-Utility	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - UCG	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - MVG	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Regulatory Liability - GGC	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Capitalized Selling Expense	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
UNICAP Section 263A Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
481(b) UNICAP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
UNICAP - IRS Audit	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Allowance for Doubtful Accounts	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Clearing Account - Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Charitable Contribution Carryover	1,597	1,597	1,597	1,570	1,570	1,570	2,030	2,030	2,030	2,030	2,030	2,030	2,030	2,030	2,030	2,384
RAR CFWE 1990-1985	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Union Gas - Non Compete	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Monarch - Non Compete	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Palmyra - Non Compete	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Prepayments	(703,598)	(703,598)	(703,598)	(526,695)	(526,695)	(526,695)	(401,308)	(401,308)	(401,308)	(950,038)	(950,038)	(950,038)	(743,943)	(743,943)	(743,943)	(599,872)
Rate Case Accrual	-	-	-	-	-	-	(263)	(263)	(263)	(363)	(363)	(363)	195	195	195	61
Research and Development Expenses	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Partnership Investment - Unitary	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Inventory Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Stock Option Expense	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Prepayments - MVG	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WACOG to FIFO Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tax Free Interest - Temp	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Federal & State Tax Interest	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Prepayments - IRS Audits	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reg Asset Benefit Accrual	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TX Rule 8.209 Reg Asset Deferral	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LA SLP Reg Asset	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Intra Period Tax Allocation	19,230	19,230	19,230	24,492												



KY 2021-00214 AG 1-19 Attachment 1  
Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Rate Division:  
S009000

Adjustment Description	Category	Adj Code	Fiscal 2019 1/31/2019	Fiscal 2019 2/28/2019	Fiscal 2019 3/31/2019	Fiscal 2019 4/30/2019	Fiscal 2019 5/31/2019	Fiscal 2019 6/30/2019	Fiscal 2019 7/31/2019	Fiscal 2019 8/31/2019	Fiscal 2019 9/30/2019	Fiscal 2020 10/31/2019	Fiscal 2020 11/30/2019	Fiscal 2020 12/31/2019	Fiscal 2020 1/31/2020	Fiscal 2020 2/29/2020
Environmental Activities	2830	ACC	ACCO1	-	-	-	-	-	-	-	-	-	-	-	-	-
Ad Valorem Taxes	2830	ACC	ACCO2	-	-	-	-	-	-	-	-	-	-	-	-	-
Directors Deferred Bonus	1900	ACC	ACCO3	-	-	-	-	-	-	-	-	-	-	-	-	-
MIP/PPP Accrual	2830	ACC	ACCO4	(41,216)	(41,216)	(45,920)	(45,920)	(45,920)	(50,623)	(50,623)	(50,623)	(50,005)	(50,005)	(50,005)	(56,669)	(56,669)
Accrued Environmental Asset	2830	ACC	ACCO5	-	-	-	-	-	-	-	-	-	-	-	-	-
Miscellaneous Accrued	2830	ACC	ACCO6	-	-	-	-	-	-	-	-	-	-	-	-	-
Self Insurance - Adjustment	1900	ACC	ACCO8	-	-	-	-	-	-	-	-	-	-	-	-	-
Vacation Accrual	1900	ACC	ACCO11	-	-	-	-	-	-	-	-	-	-	-	-	-
Worker's Comp Insurance Reserve	1900	ACC	ACCO12	40,669	40,669	48,818	48,818	48,818	58,510	58,510	58,510	75,464	75,464	75,464	75,457	75,457
<b>Accrual - Subtotal</b>				(547)	(547)	2,898	2,898	2,898	7,887	7,887	7,887	25,459	25,459	25,459	18,788	18,788
Rabbi Trust - True Up	1900	BEN	NBP01	-	-	-	-	-	-	-	-	-	-	-	-	-
SEBP Adjustment	1900	BEN	NBP03	-	-	-	-	-	-	-	-	-	-	-	-	-
SERP DTL Offset	1900	BEN	NBP04	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock Grant Plan	1900	BEN	NBP05	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust	1900	BEN	NBP06	-	-	-	-	-	-	-	-	-	-	-	-	-
VEBA Trust Contribution Adjustment	1900	BEN	NBP08	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock - MIP	1900	BEN	NBP13	-	-	-	-	-	-	-	-	-	-	-	-	-
Director's Stock Awards	1900	BEN	NBP16	-	-	-	-	-	-	-	-	-	-	-	-	-
Director's Stock - Temp	2830	BEN	NBP18	-	-	-	-	-	-	-	-	-	-	-	-	-
Pension Expense	2830	BEN	PN01	-	-	-	-	-	-	-	-	-	-	-	-	-
FAS106 Adjustment	1900	BEN	PR01	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Benefits - Subtotal</b>				-	-	-	-	-	-	-	-	-	-	-	-	-
CWIP	Excl	CWIP/RWIP	FXA26	(279,229)	(279,229)	(279,229)	(279,229)	(279,229)	(279,229)	(279,229)	(279,229)	(468,357)	(468,357)	(468,357)	(468,357)	(468,357)
RWIP	Excl	CWIP/RWIP	FXA47	(567,129)	(567,129)	(567,129)	(567,129)	(567,129)	(567,129)	(567,129)	(567,129)	(567,129)	(567,129)	(567,129)	(567,129)	(567,129)
<b>CWIP/RWIP - Subtotal</b>				(846,358)	(846,358)	(846,358)	(846,358)	(846,358)	(846,358)	(846,358)	(846,358)	(1,035,486)	(1,035,486)	(1,035,486)	(1,035,486)	(1,035,486)
Fixed Asset Cost Adjustment	2820	FKA	FXA01	(79,215,360)	(79,215,360)	(80,761,832)	(80,761,832)	(80,761,832)	(84,678,390)	(84,678,390)	(84,678,390)	(80,886,597)	(80,886,597)	(80,886,597)	(82,253,453)	(82,253,453)
Depreciation Adjustment	2820	FKA	FXA02	(12,697,036)	(12,697,036)	(12,049,558)	(12,049,558)	(12,049,558)	(11,585,411)	(11,585,411)	(11,585,411)	(16,203,651)	(16,203,651)	(16,203,651)	(16,123,204)	(16,123,204)
Book Gain/Loss on Sale of Fixed Assets	2820	FKA	FXA03	-	-	-	-	-	-	-	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	2820	FKA	FXA04	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(b) Curbion Gas	2820	FKA	FXA13	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Line Pack Gas	2820	FKA	FXA14	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Cost	2820	FKA	FXA15	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Accum	2820	FKA	FXA16	-	-	-	-	-	-	-	-	-	-	-	-	-
Repair % Completion Allowance	2820	FKA	FXA41	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(b) TR	2820	FKA	FXA46	(76,193)	(76,193)	(50,795)	(50,795)	(50,795)	(25,398)	(25,398)	(25,398)	-	-	-	-	-
AFUDC - Equity Asset Cost Adj	2820	FKA	FXA80	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Plant - Subtotal</b>				(91,988,589)	(91,988,589)	(92,862,185)	(92,862,185)	(92,862,185)	(96,289,199)	(96,289,199)	(96,289,199)	(97,090,248)	(97,090,248)	(97,090,248)	(98,376,657)	(98,376,657)
Deferred Gas Costs	Excl	GCA	GCA01	(2,517,281)	(2,517,281)	(1,466,163)	(1,466,163)	(1,466,163)	1,322,453	1,322,453	1,322,453	739,744	739,744	739,744	(438,049)	(438,049)
Over Recoveries of PGA	Excl	GCA	GCA03	(1,372,376)	(1,372,376)	(1,844,862)	(1,844,862)	(1,844,862)	(2,800,163)	(2,800,163)	(2,800,163)	(2,388,107)	(2,388,107)	(2,388,107)	(2,696,280)	(2,696,280)
PGA - Amended Item	Excl	GCA	GCA04	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Gas Cost Adjustment - Subtotal</b>				(3,889,657)	(3,889,657)	(3,311,025)	(3,311,025)	(3,311,025)	(1,477,710)	(1,477,710)	(1,477,710)	(1,648,363)	(1,648,363)	(1,648,363)	(3,134,329)	(3,134,329)
LGS - Goodwill Amortization	2830	GDW	ONT13	-	-	-	-	-	-	-	-	-	-	-	-	-
TXU - Goodwill Amortization	2830	GDW	ONT49	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Goodwill - Subtotal</b>				-	-	-	-	-	-	-	-	-	-	-	-	-
Customer Advances	1900	ONT	CAP01	162,602	162,602	143,540	143,540	143,540	161,174	161,174	161,174	165,963	165,963	165,963	165,963	165,963
Amortization - LGS Acq. 1810-13523	2830	ONT	DTE01	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Expense Projects	2830	ONT	DTE09	(8,918)	(8,918)	(8,918)	(8,918)	(8,918)	(8,918)	(8,918)	(8,918)	(8,918)	(8,918)	(8,918)	(8,918)	(8,918)
Amortization - LGS Acq. 1810-14155	2830	ONT	DTE12	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Projects - TXU Acquisition	1900	ONT	DTE14	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Amortized	1900	ONT	DVA05	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Capitalized	2830	ONT	DVA06	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Assets	2830	ONT	DVA10	-	-	-	-	-	-	-	-	-	-	-	(3,915,193)	(3,915,193)
DIG on Fixed Assets	1900	ONT	DVA16	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	2830	ONT	DVA18	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - WKG	1900	ONT	DVA19	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Liabilities	2830	ONT	DVA20	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 86/90 Lease Expense Amortiz.	2830	ONT	DVA26	-	-	-	-	-	-	-	-	-	-	-	4,012,886	4,012,886
MVG Right of Way	2830	ONT	DVA35	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - Comfurl Goodwill	2830	ONT	DVA57	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - GGC	1900	ONT	ITC01	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - UCG Non-Utility	1900	ONT	ITC02	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - UCG	1900	ONT	ITC03	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred ITC - MVG	1900	ONT	ITC04	-	-	-	-	-	-	-	-	-	-	-	-	-
Regulatory Liability - GGC	1900	ONT	ITC05	-	-	-	-	-	-	-	-	-	-	-	-	-
Capitalized Selling Expense	1900	ONT	NTE03	-	-	-	-	-	-	-	-	-	-	-	-	-
UNICAP Section 263A Costs	1900	ONT	NTE11	-	-	-	-	-	-	-	-	-	-	-	-	-
481(a) UNICAP	1900	ONT	NTE15	-	-	-	-	-	-	-	-	-	-	-	-	-
UNICAP - IRS Audit	1900	ONT	NTE19	-	-	-	-	-	-	-	-	-	-	-	-	-
Allowance for Doubtful Accounts	1900	ONT	ONT02	106,022	106,022	107,818	107,818	107,818	114,380	114,380	114,380	143,017	143,017	143,017	117,916	117,916
Clearing Account - Adjustment	1900	ONT	ONT03	-	-	-	-	-	-	-	-	-	-	-	-	-
Charitable Contribution Carryover	Excl	ONT	ONT04	73,017	73,017	83,269	83,269	83,269	101,548	101,548	101,548	133,194	133,194	133,194	191,129	191,129
RAR CFWE 1990-1985	2830	ONT	ONT06	-	-	-	-	-	-	-	-	-	-	-	-	-
Union Gas - Non Compete	1900	ONT	ONT21	-	-	-	-	-	-	-	-	-	-	-	-	-
Monarch - Non Compete	1900	ONT	ONT22	-	-	-	-	-	-	-	-	-	-	-	-	-
Palmyra - Non Compete	1900	ONT	ONT23	-	-	-	-	-	-	-	-	-	-	-	-	-
Duke - Purchased Contracts	0	ONT	ONT27	-	-	-	-	-	-	-	-	-	-	-	-	-
Prepayments	Excl	ONT	ONT31	(47,767)	(47,767)	(27,296)	(27,296)	(27,296)	(6,824)	(6,824)	(6,824)	(66,196)	(66,196)	(66,196)	(51,485)	(51,485)
Rate Case Accrual	2830	ONT	ONT32	(27,966)	(27,966)	(21,440)	(21,440)	(21,440)	(14,913)	(14,913)	(14,913)	(6,212)	(6,212)	(6,212)	(1,861)	(1,861)
Research and Development Expenses	1900	ONT	ONT33	-	-	-	-	-	-	-	-	-	-	-	-	-
Partnership Investment - Unitary	1900	ONT	ONT37	-	-	-	-	-	-	-	-	-	-	-	-	-
Inventory Adjustment	1900	ONT	ONT44	-	-	-	-	-	-	-	-	-	-	-	-	-
Stock Option Expense	1900	ONT	ONT50	-	-	-	-									

















**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-20**  
**Page 1 of 3**

**REQUEST:**

Refer to electronic workpapers “WP B.5 B” and “WP B.5 F” submitted with the Company’s filing that depicts monthly ADIT balances by FERC account for all applicable Atmos divisions during the base year and the test year. Line 10 of “WP B.5 B” shows the balance of FERC account 190 ADIT for Division 02 of \$620.421 million as of February 2021 and a balance of \$1,003.365 million as of March 2021, an increase of \$382.944 million, and that balance continuing unchanged through the end of the test year. Refer also to the Company’s March 31, 2021 10-Q at page 18 provided as FR 16(7)(p) Attachment 3 with the Company’s filing that discusses the Company’s recordation of various regulatory asset and income tax entries as of March 31, 2021 related to Winter Storm Uri that impacted customers in Kansas and Texas and the efforts to potentially securitize those costs.

- a. Describe how the Company’s use of the March 31, 2021 asset NOL ADIT for each month during the test year complies with the “consistency” rule under the IRS regulations. Cite all authorities relied on for your response.
- b. Confirm that the March 31, 2021 asset NOL ADIT is specific to that date and the circumstances that gave rise to that ADIT through that date and that it does not reflect any subsequent changes in temporary differences or taxable income or losses through the end of the test year or after the end of the test year.
- c. Confirm that the AEC asset NOL ADIT is not specific to individual rate divisions and that the actual balance fluctuates each month based on the taxable income from each and, in the aggregate, all of the AEC divisions.
- d. Confirm that the AEC maintains separate accounting records for each temporary difference and the related asset and liability ADIT amounts for each rate division, except for the asset NOL ADIT. If denied, then identify all other temporary differences, other than those incurred by or through the SSU divisions.
- e. Indicate whether the increase in NOL Carryforward ADIT shown on WP B.5 B as of March 2021 was related solely or in part to the accounting entries involving the impacts from Winter Storm Uri that impacted customers in Kansas and Texas. As part of the response, describe and identify the portion of the FERC account 190 balance change that is related to Winter Storm Uri and the part that is not.
- f. Provide the amount of the NOL Carryforward ADIT in FERC account 190 related to Winter Storm Uri that was allocated to Atmos – Kentucky Division in the filing. Provide the calculations in an Excel spreadsheet in live format with all formulas intact.
- g. Identify the division(s) by name and number for which the ADIT in FERC accounts 282 and 283 was impacted by the costs and accounting entries due to Winter Storm Uri that affected customers in Kansas and Texas. As part of your response, detail the changes to balances in those accounts.

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-20**  
**Page 2 of 3**

- h. Describe the current status and near term potential status of the securitization legislation and any other securitization efforts in Kansas and Texas regarding recovery for these extraordinary costs. Mr. Christian states at page 54 of his Direct Testimony that securitization of Winter Storm Uri gas costs is expected in the spring of 2022. In your response, address the fact that Texas HB 1520 is now law and the Railroad Commission of Texas has issued a Notice to Operators pursuant to the requirements of HB 1520.
- i. Describe in detail what accounting entries would be required for each of the ADIT balances in each FERC account for each division should the contemplated securitization occur. If any accounting entries have already been made related to securitization of these costs, detail those entries by month and by division.

**RESPONSE:**

- a. The Company confirms that it must comply with the normalization provisions contained in the IRC, including the consistency rule.

To use a normalization method of accounting, section 168(i)(9)(A) requires that in calculating its tax expense for ratemaking purposes a taxpayer must use the same method of depreciation and a depreciation period that is no shorter than that used to compute its depreciation expense. The use of an estimate or projection of a taxpayer's tax expense, depreciation expense or reserve for deferred taxes for ratemaking purposes would not satisfy the consistency rules if a consistent estimate or projection were not also used with respect to rate base. Simply stated, the consistency rules of section 168(i)(9)(B) require consistency in the treatment of projected costs for rate base, regulated depreciation expense, tax expense and the reserve for deferred taxes. Numerous PLRs have been issued addressing the consistency rule.

- b. The Company confirms the March 31, 2021 NOL ADIT is specific to that date and does not incorporate subsequent changes.
- c. The Company confirms that the NOL ADIT is not specific to individual rate divisions, except in circumstances where a specific one off event, such as Winter Storm Uri, can be identified and isolated from the general NOL ADIT calculations. The Company would note that 'as filed', the NOL ADIT did not isolate the impact of Winter Storm Uri but is supplementing its response to Staff DR No. 1-55 to isolate and remove the impact of Winter Storm Uri on deficiency.
- d. The Company confirms that accounting records are maintained for each temporary difference at a rate division level, including the Shared Service division, except the NOL ADIT.
- e. The increase in NOL carryforward as shown on WP B.5 B does relate in part to the impacts from Winter Storm URI. As noted in response to subpart c. that our filed case did not isolate this impact but we are updating the filing to isolate this impact. Please refer to the revised relied file "ADIT for KY 04-30-21 updated NOL for URI 8-17-21.xlsx" provided in the Company's supplemental response to Staff DR No. 1-55 for summary of impact to FERC account 190 in the balance of \$439,642,155.



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-20**  
**Page 3 of 3**

- f. Upon the revision of the KY ADIT balances discussed in subpart (e), there is zero balance allocated to Kentucky relating to Winter Storm Uri. Please refer to the revised relied file referenced in the responses to subparts (c) and (e).
- g. The total impact of Winter Storm Uri recorded to FERC account 282 and 283 totaled \$469,412,209, of which zero balance is, with the supplement to Staff DR No. 1-55, allocated to Kentucky. Refer to the response to subpart (f).
- h. Please see the Company's response to Staff DR No. 2-21 concerning the status of the Company's securitization efforts in Kansas and Texas regarding extraordinary costs. As indicated in that response, the Company now anticipates that securitization in Texas could be completed in late summer 2022 if the maximum procedural schedule allowed by statute is utilized at both the Railroad Commission of Texas and the Texas Financing Authority.
- i. The securitization is still in progress and to date the accounting entries have not been made. The Company is still finalizing the impacts for securitization and confirm that zero balances will be recorded to Kentucky.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-21**  
**Page 1 of 1**

**REQUEST:**

Provide the amount of PRP and Non-PRP investment for each actual fiscal year starting in 2016 and going through 2020, projected 2021, and projected 2022, distinguished between Kentucky division-only investment and investment allocated from each of the other divisions. Separate amounts related to pipe replacement investment between bare steel and other, such as the requested reflection of Aldyl-A pipe in the PRP.

**RESPONSE:**

Please see Attachment 1.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-21\_Att1 - 2016-2022 CapEx Spend.xlsx, 2 Pages.

Respondent: Joe Christian

Atmos Energy Corporation  
 Kentucky Mid-States Division  
 Kentucky Operations

	Total CapEx		PRP CapEx		Non-PRP CapEx	
	Fiscal 2016	Budget 2016	Fiscal 2016	Budget 2016	Fiscal 2016	Budget 2016
	Total Year	Total Year	Total Year	Total Year	Total Year	Total Year
Growth	\$ 3,820,728	\$ 4,463,109	\$ -	\$ -	\$ 3,820,728	\$ 4,463,109
System Integrity	\$ 44,337,444	\$ 46,431,093	\$ 29,968,709	\$ 30,083,470	\$ 14,368,735	\$ 16,347,623
System Improvements	\$ 11,348,317	\$ 8,066,897	\$ -	\$ -	\$ 11,348,317	\$ 8,066,897
Public Improvements	\$ 1,361,585	\$ 2,219,620	\$ -	\$ -	\$ 1,361,585	\$ 2,219,620
Information Technology	\$ 349,266	\$ 464,057	\$ -	\$ -	\$ 349,266	\$ 464,057
Equipment	\$ 595,485	\$ 531,355	\$ -	\$ -	\$ 595,485	\$ 531,355
Structures	\$ 2,354,395	\$ 1,850,000	\$ -	\$ -	\$ 2,354,395	\$ 1,850,000
Vehicles	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Misc	\$ 23,219	\$ -	\$ -	\$ -	\$ 23,219	\$ -
Overhead	\$ 0	\$ -	\$ -	\$ -	\$ 0	\$ -
<b>Capital</b>	<b>\$ 64,190,439</b>	<b>\$ 64,026,131</b>	<b>\$ 29,968,709</b>	<b>\$ 30,083,470</b>	<b>\$ 34,221,730</b>	<b>\$ 33,942,661</b>

	Total CapEx		PRP CapEx		Non-PRP CapEx	
	Fiscal 2017	Budget 2017	Fiscal 2017	Budget 2017	Fiscal 2017	Budget 2017
	Total Year	Total Year	Total Year	Total Year	Total Year	Total Year
Growth	\$ 2,746,322	\$ 3,091,003	\$ -	\$ -	\$ 2,746,322	\$ 3,091,003
System Integrity	\$ 59,785,473	\$ 58,835,462	\$ 39,898,050	\$ 39,712,312	\$ 19,887,423	\$ 19,123,150
System Improvements	\$ 9,253,886	\$ 8,131,909	\$ -	\$ -	\$ 9,253,886	\$ 8,131,909
Public Improvements	\$ 180,557	\$ 656,875	\$ -	\$ -	\$ 180,557	\$ 656,875
Information Technology	\$ 259,419	\$ 327,503	\$ -	\$ -	\$ 259,419	\$ 327,503
Equipment	\$ 665,072	\$ 609,970	\$ -	\$ -	\$ 665,072	\$ 609,970
Structures	\$ 27,898	\$ 57,000	\$ -	\$ -	\$ 27,898	\$ 57,000
Vehicles	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Misc	\$ (26,790)	\$ -	\$ -	\$ -	\$ (26,790)	\$ -
Overhead	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Capital</b>	<b>\$ 72,891,836</b>	<b>\$ 71,709,721</b>	<b>\$ 39,898,050</b>	<b>\$ 39,712,312</b>	<b>\$ 32,993,786</b>	<b>\$ 31,997,409</b>

	Total CapEx		PRP CapEx		Non-PRP CapEx	
	Fiscal 2018	Budget 2018	Fiscal 2018	Budget 2018	Fiscal 2018	Budget 2018
	Total Year	Total Year	Total Year	Total Year	Total Year	Total Year
Growth	\$ 4,595,436	\$ 3,032,159	\$ -	\$ -	\$ 4,595,436	\$ 3,032,159
System Integrity	\$ 56,656,059	\$ 60,102,375	\$ 45,876,427	\$ 44,340,870	\$ 10,779,632	\$ 15,761,505
System Improvements	\$ 15,661,053	\$ 11,640,738	\$ -	\$ -	\$ 15,661,053	\$ 11,640,738
Public Improvements	\$ 1,403,637	\$ 1,344,487	\$ -	\$ -	\$ 1,403,637	\$ 1,344,487
Information Technology	\$ 129,531	\$ 145,854	\$ -	\$ -	\$ 129,531	\$ 145,854
Equipment	\$ 539,706	\$ 624,768	\$ -	\$ -	\$ 539,706	\$ 624,768
Structures	\$ 819,622	\$ 151,800	\$ -	\$ -	\$ 819,622	\$ 151,800
Vehicles	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Misc	\$ 1,387	\$ -	\$ -	\$ -	\$ 1,387	\$ -
Overhead	\$ 0	\$ -	\$ -	\$ -	\$ 0	\$ -
<b>Capital</b>	<b>\$ 79,806,430</b>	<b>\$ 77,042,182</b>	<b>\$ 45,876,427</b>	<b>\$ 44,340,870</b>	<b>\$ 33,930,003</b>	<b>\$ 32,701,312</b>

	Total CapEx		PRP CapEx		Non-PRP CapEx	
	Fiscal 2019	Budget 2019	Fiscal 2019	Budget 2019	Fiscal 2019	Budget 2019
	Total Year	Total Year	Total Year	Total Year	Total Year	Total Year
Growth	\$ 6,421,519	\$ 4,758,929	\$ -	\$ -	\$ 6,421,519	\$ 4,758,929
System Integrity	\$ 62,837,253	\$ 57,775,141	\$ 29,500,929	\$ 28,775,906	\$ 33,336,324	\$ 28,999,235
System Improvements	\$ 16,263,520	\$ 22,686,735	\$ -	\$ -	\$ 16,263,520	\$ 22,686,735
Public Improvements	\$ 1,322,628	\$ 563,102	\$ -	\$ -	\$ 1,322,628	\$ 563,102
Information Technology	\$ 141,433	\$ 111,754	\$ -	\$ -	\$ 141,433	\$ 111,754
Equipment	\$ 665,011	\$ 563,897	\$ -	\$ -	\$ 665,011	\$ 563,897
Structures	\$ 249,317	\$ 195,711	\$ -	\$ -	\$ 249,317	\$ 195,711
Vehicles	\$ (26,203)	\$ -	\$ -	\$ -	\$ (26,203)	\$ -
Misc	\$ 39,306	\$ -	\$ -	\$ -	\$ 39,306	\$ -
Overhead	\$ 0	\$ (0)	\$ -	\$ -	\$ 0	\$ (0)
<b>Capital</b>	<b>\$ 87,913,785</b>	<b>\$ 86,655,269</b>	<b>\$ 29,500,929</b>	<b>\$ 28,775,906</b>	<b>\$ 58,412,855</b>	<b>\$ 57,879,363</b>

Atmos Energy Corporation  
 Kentucky Mid-States Division  
 Kentucky Operations

	Total CapEx Fiscal 2020 Total Year	Total CapEx Budget 2020 Total Year	PRP CapEx Fiscal 2020 Total Year	PRP CapEx Budget 2020 Total Year	Non-PRP CapEx Fiscal 2020 Total Year	Non-PRP CapEx Budget 2020 Total Year
Growth	\$ 6,064,660	\$ 6,079,826	\$ -	\$ -	\$ 6,064,660	\$ 6,079,826
System Integrity	\$ 47,532,802	\$ 46,063,016	\$ 28,236,041	\$ 27,724,753	\$ 19,296,761	\$ 18,338,263
System Improvements	\$ 2,832,706	\$ 3,110,382	\$ -	\$ -	\$ 2,832,706	\$ 3,110,382
Public Improvements	\$ 876,210	\$ 588,535	\$ -	\$ -	\$ 876,210	\$ 588,535
Information Technology	\$ 341,038	\$ 210,470	\$ -	\$ -	\$ 341,038	\$ 210,470
Equipment	\$ 671,479	\$ 723,906	\$ -	\$ -	\$ 671,479	\$ 723,906
Structures	\$ 273,739	\$ 49,615	\$ -	\$ -	\$ 273,739	\$ 49,615
Vehicles	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Misc	\$ (71,384)	\$ -	\$ -	\$ -	\$ (71,384)	\$ -
Overhead	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Capital</b>	<b>\$ 58,521,250</b>	<b>\$ 56,825,750</b>	<b>\$ 28,236,041</b>	<b>\$ 27,724,753</b>	<b>\$ 30,285,209</b>	<b>\$ 29,100,997</b>

	Total CapEx Fiscal 2021 Total Year <i>Projected</i>	Total CapEx Budget 2021 Total Year	PRP CapEx Fiscal 2021 Total Year <i>Projected</i>	PRP CapEx Budget 2021 Total Year	Non-PRP CapEx Fiscal 2021 Total Year <i>Projected</i>	Non-PRP CapEx Budget 2021 Total Year
Growth	\$ 6,950,200	\$ 6,813,901	\$ -	\$ -	\$ 6,950,200	\$ 6,813,901
System Integrity	\$ 48,472,874	\$ 49,243,089	\$ 27,879,580	\$ 28,158,942	\$ 20,593,294	\$ 21,084,146
System Improvements	\$ 1,710,056	\$ 1,308,690	\$ -	\$ -	\$ 1,710,056	\$ 1,308,690
Public Improvements	\$ 222,384	\$ 191,616	\$ -	\$ -	\$ 222,384	\$ 191,616
Information Technology	\$ 77,125	\$ 112,736	\$ -	\$ -	\$ 77,125	\$ 112,736
Equipment	\$ 750,703	\$ 736,702	\$ -	\$ -	\$ 750,703	\$ 736,702
Structures	\$ 147,114	\$ 112,750	\$ -	\$ -	\$ 147,114	\$ 112,750
Vehicles	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Misc	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Overhead	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Capital</b>	<b>\$ 58,330,455</b>	<b>\$ 58,519,484</b>	<b>\$ 27,879,580</b>	<b>\$ 28,158,942</b>	<b>\$ 30,450,875</b>	<b>\$ 30,360,542</b>

	Total CapEx Budget 2022 Total Year <i>Projected</i>	PRP CapEx Budget 2022 Total Year <i>Projected</i>	Non-PRP CapEx Budget 2022 Total Year <i>Projected</i>
Growth	\$ 7,323,091	\$ -	\$ 7,323,091
System Integrity	\$ 53,087,215	\$ 30,853,237	\$ 22,233,977
System Improvements	\$ 1,150,550	\$ -	\$ 1,150,550
Public Improvements	\$ 909,200	\$ -	\$ 909,200
Information Technology	\$ 114,991	\$ -	\$ 114,991
Equipment	\$ 545,893	\$ -	\$ 545,893
Structures	\$ 115,005	\$ -	\$ 115,005
Vehicles	\$ -	\$ -	\$ -
Misc	\$ -	\$ -	\$ -
Overhead	\$ -	\$ -	\$ -
<b>Capital</b>	<b>\$ -</b>	<b>\$ 30,853,237</b>	<b>\$ 32,392,707</b>

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-22**  
**Page 1 of 1**

**REQUEST:**

Refer to the Direct Testimony of Mr. Christian at page 13. Provide the PRP investment projected for each quarter during calendar year 2022 separated between bare steel and Aldyl-A pipe replacement. In addition, identify the 2022 amounts included in the test year in the instant proceeding and the amounts to be included in the PRP filing.

**RESPONSE:**

Please see the file "Kentucky - CapEx 5 Year Plan - RATE CASE FILING.xlsx" included with Company's response to Staff DR No. 1-55. The requested information, shown monthly, identifies the requested projects and demonstrates that no PRP investment is included in the last three months of the test period (October 2022 - December 2022).

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-23**  
**Page 1 of 1**

**REQUEST:**

Refer to the Direct Testimony of Mr. Austin at pages 27 and 28 regarding the potential timeline for the Aldyl-A pipe replacement. Provide the Company's most recent estimates of the replacement miles and investment required to replace the Aldyl-A pipe by year.

**RESPONSE:**

The Kentucky System contains approximately 205 miles of Aldyl-A pipe as of 08/2021. The projects listed for FY 2022 total approximately \$2.79 million and will replace about 3.3 miles of Aldyl-A pipe. Every project is different and costs will vary due to location, population density, existing utilities, and the amount of asphalt and concrete that need to be replaced on each project. We have estimated that the majority of the projects will be in less dense areas than the PRP, which for the most part, is in the older and more developed areas of towns. In addition, each year a list of the Aldyl-A projects will be submitted as part of the Company's PRP filing in order for the Commission to review and approve the cost and quantity of each individual project.

Respondent: Ryan Austin

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-24**  
**Page 1 of 1**

**REQUEST:**

Refer to the Direct Testimony of Mr. Austin at pages 27 and 28 regarding the potential timeline for the Aldyl-A pipe replacement. What is the average annual investment currently estimated in order to replace the known Aldyl-A pipe problems.

**RESPONSE:**

Please see the Company's response to AG DR No. 1-23. The Company estimates from its operating plan approximately \$47.4 million in Aldyl-A replacement as part of the annual PRP filing.

	<b>FY22</b>	<b>FY23</b>	<b>FY24</b>	<b>FY25</b>	<b>FY26</b>	<b>Total</b>
Bare Steel	\$ 28.1	\$ 28.6	\$ 28.0	\$ 28.0	\$ 28.0	\$ 140.7
Aldyl-A	\$ 2.8	\$ 5.2	\$ 9.3	\$ 13.0	\$ 17.1	\$ 47.4
Total PRP	\$ 30.9	\$ 33.9	\$ 37.3	\$ 41.0	\$ 45.1	\$ 188.1

Respondent: Ryan Austin

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-25**  
**Page 1 of 1**

**REQUEST:**

Provide the Pipe Replacement Program (“PRP”) actual gross plant in service by plant account and by month from January 2019 through the last month with available data and the projected amounts by plant account and by month for the remaining projected months through the end of the test year. Use the same accounts/subaccounts that the Company presently uses for PRP in the test year even though the Company has not designated its capital expenditures and plant additions in that manner in the filing.

**RESPONSE:**

Please see Attachment 1 for PRP actual gross plant in service by plant account and by month from January 2019 through July 2021.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-25\_Att1 - KY PRP Jan'19-Jul'21.xlsx, 27 Pages.

Respondent: Joe Christian



Atmos Energy Corporation, Kentucky  
PRP Additions and Retirements  
January 2019 - July 2021

Column Labels

Utility Account	201901	201902	201903	201904	201905	201906	201907	201908	201909	201910	201911	201912	202001	202002	202003	202004
37401					10,130,692.47	5,595.47	366,461.25	(10,124,659.84)	2,163.31	(32.11)	892.05	(65.76)				
37402	(4,740.18)	58.87	220.83	343.24	48.38	395.69		(212.50)								
37600				2,072.39	254.96	78.81	78.26									
37601	(101,207.38)	1,310.73	4,714.57	7,327.67	10,131,725.43	5,525.17	366,461.24	8,552,619.69	109,054.62	(1,618.70)	44,969.68	(3,314.49)	115,298.76	17,693.96	981.56	(78,838.16)
37602	2,773,122.05	239,126.69	79,921.18	1,413,321.65	475,447.25	638,625.58	279,782.79	1,556,100.10	5,345,864.50	139,913.67	89,960.68	361,568.62	1,014,025.77	213,745.81	251,452.80	281,540.26
37800	(3,974.08)	48.42	187.97	286.94	40.47	(2.77)		573,257.83	3,281.01	(48.73)	1,352.96	(99.74)	4,878.26	748.62	41.52	5,471.46
37900	(1,972.18)	25.57	91.89	142.78	20.16	(1.39)		228,865.91	1,310.00	(19.45)	540.19	(39.81)				
38000	734,580.82	719,567.34	591,931.76	992,143.99	1,012,555.01	391,642.00	1,108,720.38	1,323,342.31	1,854,125.51	595,246.81	405,322.12	408,193.24	650,680.64	553,275.85	606,623.87	577,873.28
38100																
38300	(37.92)	0.50	3,697.34	2.74	0.39	485,294.06		2,098.77	12.02	(0.19)	4.96	90,115.78				
<b>Additions Total</b>	<b>3,395,771.13</b>	<b>960,138.12</b>	<b>680,765.54</b>	<b>2,415,641.40</b>	<b>21,750,784.52</b>	<b>1,527,152.62</b>	<b>2,121,503.92</b>	<b>2,111,412.27</b>	<b>7,315,810.97</b>	<b>733,441.30</b>	<b>543,042.64</b>	<b>856,357.84</b>	<b>1,784,883.43</b>	<b>785,464.24</b>	<b>859,099.75</b>	<b>786,046.84</b>
37601	(175,329.53)		(6,379.68)	(87,915.07)	(27,030.66)	(41,542.14)	(267,319.75)	(23,652.08)		(126,564.91)	(17,466.01)	(30,136.90)	(245,802.77)		(6,690.11)	(25,140.95)
37602	(1,759.41)			(29,795.15)			(8,068.84)	(13,535.55)		(17,836.43)	(54,707.72)	(11,884.81)	(48,626.99)		(5,418.55)	
37800	(894.98)					(476.81)	(6,397.53)								(985.55)	
37905							(3,170.10)									
38000	(107,191.29)	(189,634.80)	(241,809.16)	(8,583.09)	(64,203.58)			(209,411.93)		(130,559.29)	(426,431.72)	(69,010.95)	(63,067.09)	(809,820.79)	(273,551.42)	(109,084.75)
<b>Retirements Total</b>	<b>(285,175.21)</b>	<b>(189,634.80)</b>	<b>(248,188.84)</b>	<b>(126,293.31)</b>	<b>(91,234.24)</b>	<b>(42,018.95)</b>	<b>(284,956.22)</b>	<b>(246,599.56)</b>	<b>-</b>	<b>(274,960.63)</b>	<b>(498,605.45)</b>	<b>(111,032.66)</b>	<b>(357,496.85)</b>	<b>(809,820.79)</b>	<b>(286,645.63)</b>	<b>(134,225.70)</b>
<b>Grand Total</b>	<b>3,110,595.92</b>	<b>770,503.32</b>	<b>432,576.70</b>	<b>2,289,348.09</b>	<b>21,659,550.28</b>	<b>1,485,133.67</b>	<b>1,836,547.70</b>	<b>1,864,812.71</b>	<b>7,315,810.97</b>	<b>458,480.67</b>	<b>44,437.19</b>	<b>745,325.18</b>	<b>1,427,386.58</b>	<b>(24,356.55)</b>	<b>572,454.12</b>	<b>651,821.14</b>

Atmos Energy Corporation, Kentucky  
PRP Additions and Retirements  
January 2019 - July 2021

Utility Account	202005	202006	202007	202008	202009	202010	202011	202012	202101	202102	202103	202104	202105	202106	202107
37401															
37402															
37600															
37601	(33,293.31)				420.64	0.06						8,420.64	351.01	34,880.42	(48.47)
37602	99,139.33	1,377,549.17	2,163,256.22	4,784,098.44	5,510,085.08	593,236.24	168,482.22	964,436.99	409,209.83	142,966.73	799,413.85	558,133.07	2,690,066.23	3,478,081.38	2,250,050.75
37800					10,621.18	1.49								27,778.57	(30.85)
37900															
38000	525,316.92	1,017,701.09	981,060.31	1,750,641.50	2,063,032.94	649,080.04	358,986.11	786,032.47	816,543.12	451,990.31	879,823.06	809,474.41	711,502.04	994,489.20	976,365.97
38100					143,378.98										
38300					21,766.79			1,841.01							
<b>Additions Total</b>	<u>591,162.94</u>	<u>2,395,250.26</u>	<u>3,144,316.53</u>	<u>6,534,739.94</u>	<u>7,749,305.61</u>	<u>1,242,317.83</u>	<u>527,468.33</u>	<u>1,752,310.47</u>	<u>1,225,752.95</u>	<u>594,957.04</u>	<u>1,679,236.91</u>	<u>1,376,028.12</u>	<u>3,401,919.28</u>	<u>4,535,229.57</u>	<u>3,226,337.40</u>
37601			(17,020.12)	(102,474.99)	(99,948.01)	(83,674.00)	(335,494.28)	(148,876.19)	(35,883.60)	(173,809.18)	(1,785.10)	(15,639.67)	(14,113.20)	(131,228.44)	(98,579.54)
37602			(2,175.31)	(14,204.83)	(105.89)	(26,158.99)	(1,362.09)	(59.82)	(10,341.34)	(3,203.35)	(3,763.40)	(5,970.88)		(14,988.09)	
37800			(288.78)	(5,763.21)									(342.96)		
37905															
38000	(83,280.03)	(17,547.36)	(241,640.69)	(33,809.55)	(198,624.38)	(293,781.59)	(43,448.61)	(342,771.60)	(251,655.80)	(295,485.98)	(7,385.61)	(150,755.83)	(244,945.48)	(159,270.62)	(305,129.22)
<b>Retirements Total</b>	<u>(83,280.03)</u>	<u>(17,547.36)</u>	<u>(261,124.90)</u>	<u>(156,252.58)</u>	<u>(298,678.28)</u>	<u>(403,614.58)</u>	<u>(380,304.98)</u>	<u>(491,707.61)</u>	<u>(297,880.74)</u>	<u>(472,498.51)</u>	<u>(12,934.11)</u>	<u>(172,366.38)</u>	<u>(259,401.64)</u>	<u>(305,487.15)</u>	<u>(403,708.76)</u>
<b>Grand Total</b>	<u>507,882.91</u>	<u>2,377,702.90</u>	<u>2,883,191.63</u>	<u>6,378,487.36</u>	<u>7,450,627.33</u>	<u>838,703.25</u>	<u>147,163.35</u>	<u>1,260,602.86</u>	<u>927,872.21</u>	<u>122,458.53</u>	<u>1,666,302.80</u>	<u>1,203,661.74</u>	<u>3,142,517.64</u>	<u>4,229,742.42</u>	<u>2,822,628.64</u>

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201901	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	175,967.82
050 Mid-States Division	009 - WKG Division	201901	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	32,302.00
050 Mid-States Division	009 - WKG Division	201901	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(70,703.69)
050 Mid-States Division	009 - WKG Division	201901	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(242.88)
050 Mid-States Division	009 - WKG Division	201901	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	223,553.97
050 Mid-States Division	009 - WKG Division	201901	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(346.89)
050 Mid-States Division	009 - WKG Division	201901	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(35,149.92)
050 Mid-States Division	009 - WKG Division	201901	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	115,584.42
050 Mid-States Division	009 - WKG Division	201901	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	52,815.57
050 Mid-States Division	009 - WKG Division	201901	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(747.91)
050 Mid-States Division	009 - WKG Division	201901	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	465.09
050 Mid-States Division	009 - WKG Division	201901	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	14,599.20
050 Mid-States Division	009 - WKG Division	201901	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	86,373.59
050 Mid-States Division	009 - WKG Division	201901	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	32,727.79
050 Mid-States Division	009 - WKG Division	201901	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(18.97)
050 Mid-States Division	009 - WKG Division	201901	Addition	37402	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(4,740.18)
050 Mid-States Division	009 - WKG Division	201901	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(227.55)
050 Mid-States Division	009 - WKG Division	201901	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(18.97)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(18,963.02)
050 Mid-States Division	009 - WKG Division	201901	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(94.82)
050 Mid-States Division	009 - WKG Division	201901	Addition	38300	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(37.92)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(58,747.41)
050 Mid-States Division	009 - WKG Division	201901	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(94.81)
050 Mid-States Division	009 - WKG Division	201901	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(100,788.40)
050 Mid-States Division	009 - WKG Division	201901	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(18.97)
050 Mid-States Division	009 - WKG Division	201901	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(1,896.30)
050 Mid-States Division	009 - WKG Division	201901	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(94.82)
050 Mid-States Division	009 - WKG Division	201901	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(3,830.52)
050 Mid-States Division	009 - WKG Division	201901	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(37.94)
050 Mid-States Division	009 - WKG Division	201901	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(18.97)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	290,065.35
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	1,643,703.55
050 Mid-States Division	009 - WKG Division	201901	Retirement	37800	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(137.83)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37601	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(829.89)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37601	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(84,348.19)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37800	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(729.69)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37601	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(34,804.00)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37601	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(6,045.08)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37800	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(27.46)
050 Mid-States Division	009 - WKG Division	201901	Addition	37601	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(1.80)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(35.99)
050 Mid-States Division	009 - WKG Division	201901	Addition	37800	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(9.00)
050 Mid-States Division	009 - WKG Division	201901	Addition	37800	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(1.80)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(1.80)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(39.59)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.46625	PRP.2738.College St Lebanon	System Integrity	2609-KY PRP-Mains	1,676.86
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.46625	PRP.2738.College St Lebanon	System Integrity	2609-KY PRP-Mains	1,371.98
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.47794	PRP.2636.East 3rd St	System Integrity	2609-KY PRP-Mains	222,935.64
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.47794	PRP.2636.East 3rd St	System Integrity	2609-KY PRP-Mains	(405,439.44)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.47794	PRP.2636.East 3rd St	System Integrity	2609-KY PRP-Mains	182,401.85
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	98,229.29
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	327,430.96
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	229,201.67
050 Mid-States Division	009 - WKG Division	201901	Retirement	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	(1,154.15)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37601	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	(89.85)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37601	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	(25,140.94)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	(605.26)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37601	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	(9,535.73)
050 Mid-States Division	009 - WKG Division	201901	Retirement	37601	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	(8,162.75)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.48042	PRP.2634.HWY 62	System Integrity	2609-KY PRP-Mains	18,945.60
050 Mid-States Division	009 - WKG Division	201901	Addition	38000	050.48042	PRP.2634.HWY 62	System Integrity	2609-KY PRP-Mains	191.37
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.48136	PRP.2734.E. Madison St CC	System Integrity	2609-KY PRP-Mains	(165.09)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.48307	PRP.2636.East 7th St	System Integrity	2609-KY PRP-Mains	4,448.39
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.49278	PRP.2734.N. Main St.FY19	System Integrity	2609-KY PRP-Mains	221,937.60
050 Mid-States Division	009 - WKG Division	201901	Retirement	37601	050.49278	PRP.2734.N. Main St.FY19	System Integrity	2609-KY PRP-Mains	(6,373.10)
050 Mid-States Division	009 - WKG Division	201901	Addition	37602	050.50257	PRP.2637.Davis Ave	System Integrity	2609-KY PRP-Mains	14,165.65
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	149,871.76
050 Mid-States Division	009 - WKG Division	201902	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(1,739.08)
050 Mid-States Division	009 - WKG Division	201902	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(12,550.93)
050 Mid-States Division	009 - WKG Division	201902	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(4.73)
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	27,215.65

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	241,616.81
050 Mid-States Division	009 - WKG Division	201902	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(231.26)
050 Mid-States Division	009 - WKG Division	201902	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(33,364.47)
050 Mid-States Division	009 - WKG Division	201902	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(77,576.13)
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	77,012.29
050 Mid-States Division	009 - WKG Division	201902	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(57,544.82)
050 Mid-States Division	009 - WKG Division	201902	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(2,558.60)
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	198.09
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	626.49
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.26300	MayfieldPRPServices	System Integrity	2610-KY PRP-Services	340.18
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	38,920.84
050 Mid-States Division	009 - WKG Division	201902	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(1,512.78)
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	18,121.47
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	165,835.13
050 Mid-States Division	009 - WKG Division	201902	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(2,552.00)
050 Mid-States Division	009 - WKG Division	201902	Addition	37402	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	58.87
050 Mid-States Division	009 - WKG Division	201902	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.50
050 Mid-States Division	009 - WKG Division	201902	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	2.95
050 Mid-States Division	009 - WKG Division	201902	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	24.57
050 Mid-States Division	009 - WKG Division	201902	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1.23
050 Mid-States Division	009 - WKG Division	201902	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1.23
050 Mid-States Division	009 - WKG Division	201902	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.25
050 Mid-States Division	009 - WKG Division	201902	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	49.63
050 Mid-States Division	009 - WKG Division	201902	Addition	38300	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.50
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	245.70
050 Mid-States Division	009 - WKG Division	201902	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1.23
050 Mid-States Division	009 - WKG Division	201902	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1,305.81
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	761.16
050 Mid-States Division	009 - WKG Division	201902	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.25
050 Mid-States Division	009 - WKG Division	201902	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.25
050 Mid-States Division	009 - WKG Division	201902	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.25
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	2,949.57
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	520.52
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(10.74)
050 Mid-States Division	009 - WKG Division	201902	Addition	37601	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(0.49)
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(0.49)
050 Mid-States Division	009 - WKG Division	201902	Addition	37800	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(0.49)
050 Mid-States Division	009 - WKG Division	201902	Addition	37800	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(2.45)
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	(9.76)
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.46625	PRP.2738.College St Lebanon	System Integrity	2609-KY PRP-Mains	4,895.71
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.46625	PRP.2738.College St Lebanon	System Integrity	2609-KY PRP-Mains	5,983.64
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.46665	PRP.2734.East 10th/31W	System Integrity	2609-KY PRP-Mains	(656,828.35)
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.46665	PRP.2734.East 10th/31W	System Integrity	2609-KY PRP-Mains	32,775.72
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.46665	PRP.2734.East 10th/31W	System Integrity	2609-KY PRP-Mains	65.66
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.46665	PRP.2734.East 10th/31W	System Integrity	2609-KY PRP-Mains	623,986.97
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	6,536.44
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	21,788.09
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	15,251.66
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.48042	PRP.2634.HWY 62	System Integrity	2609-KY PRP-Mains	(18,945.60)
050 Mid-States Division	009 - WKG Division	201902	Addition	38000	050.48042	PRP.2634.HWY 62	System Integrity	2609-KY PRP-Mains	(191.37)
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.48136	PRP.2734.E. Madison St CC	System Integrity	2609-KY PRP-Mains	110,535.17
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.48136	PRP.2734.E. Madison St CC	System Integrity	2609-KY PRP-Mains	(138,313.54)
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.48136	PRP.2734.E. Madison St CC	System Integrity	2609-KY PRP-Mains	27,633.81
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.48307	PRP.2636.East 7th St	System Integrity	2609-KY PRP-Mains	194,152.22
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.48307	PRP.2636.East 7th St	System Integrity	2609-KY PRP-Mains	97,076.09
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.48307	PRP.2636.East 7th St	System Integrity	2609-KY PRP-Mains	(485,494.93)
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.48307	PRP.2636.East 7th St	System Integrity	2609-KY PRP-Mains	194,152.24
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	200,035.90
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.49278	PRP.2734.N. Main St.FY19	System Integrity	2609-KY PRP-Mains	(616.17)
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.50257	PRP.2637.Davis Ave	System Integrity	2609-KY PRP-Mains	14,165.65
050 Mid-States Division	009 - WKG Division	201902	Addition	37602	050.50257	PRP.2637.Davis Ave	System Integrity	2609-KY PRP-Mains	(14,165.65)
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(325,839.58)
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	476,720.42
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	60,803.96
050 Mid-States Division	009 - WKG Division	201903	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(6,607.59)
050 Mid-States Division	009 - WKG Division	201903	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(1,747.23)
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	94,646.01
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(59,517.65)
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	10,471.21
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	657,992.54
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(465,170.78)

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201903	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(4,162.68)
050 Mid-States Division	009 - WKG Division	201903	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(210,440.02)
050 Mid-States Division	009 - WKG Division	201903	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(18,851.64)
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	1,835.03
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(192,596.71)
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	216,199.25
050 Mid-States Division	009 - WKG Division	201903	Addition	38300	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	3,695.58
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	209,293.28
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(194,909.39)
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	348.89
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.26300	MayfieldPRPServices	System Integrity	2610-KY PRP-Services	(38.73)
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	46,413.21
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	6,255.41
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	1,095,065.53
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(1,084,512.22)
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	38,480.49
050 Mid-States Division	009 - WKG Division	201903	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	4,694.58
050 Mid-States Division	009 - WKG Division	201903	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1.78
050 Mid-States Division	009 - WKG Division	201903	Addition	37402	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	220.83
050 Mid-States Division	009 - WKG Division	201903	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	10.60
050 Mid-States Division	009 - WKG Division	201903	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	88.33
050 Mid-States Division	009 - WKG Division	201903	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.89
050 Mid-States Division	009 - WKG Division	201903	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	178.42
050 Mid-States Division	009 - WKG Division	201903	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	4.42
050 Mid-States Division	009 - WKG Division	201903	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	4.42
050 Mid-States Division	009 - WKG Division	201903	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.89
050 Mid-States Division	009 - WKG Division	201903	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	4.42
050 Mid-States Division	009 - WKG Division	201903	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.89
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	883.29
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	2,736.43
050 Mid-States Division	009 - WKG Division	201903	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.89
050 Mid-States Division	009 - WKG Division	201903	Addition	38300	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1.76
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(40.37)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(228.84)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	0.55
050 Mid-States Division	009 - WKG Division	201903	Addition	37800	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	2.80
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	12.36
050 Mid-States Division	009 - WKG Division	201903	Addition	37601	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	0.55
050 Mid-States Division	009 - WKG Division	201903	Addition	37800	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	0.55
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.46611	PRP.2738.Coakley Street	System Integrity	2609-KY PRP-Mains	11.21
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.46625	PRP.2738.College St Lebanon	System Integrity	2609-KY PRP-Mains	(275.35)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.46625	PRP.2738.College St Lebanon	System Integrity	2609-KY PRP-Mains	(336.54)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	(352.99)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	(504.30)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	(151.28)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.48042	PRP.2634.HWY 62	System Integrity	2609-KY PRP-Mains	(832.31)
050 Mid-States Division	009 - WKG Division	201903	Addition	38000	050.48042	PRP.2634.HWY 62	System Integrity	2609-KY PRP-Mains	(8.41)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.48136	PRP.2734.E. Madison St CC	System Integrity	2609-KY PRP-Mains	264.97
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.48136	PRP.2734.E. Madison St CC	System Integrity	2609-KY PRP-Mains	1,059.85
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.48307	PRP.2636.East 7th St	System Integrity	2609-KY PRP-Mains	(34.45)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.48307	PRP.2636.East 7th St	System Integrity	2609-KY PRP-Mains	(17.22)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.48307	PRP.2636.East 7th St	System Integrity	2609-KY PRP-Mains	(34.45)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	80,484.38
050 Mid-States Division	009 - WKG Division	201903	Retirement	37601	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	(503.23)
050 Mid-States Division	009 - WKG Division	201903	Retirement	37601	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	(4,031.19)
050 Mid-States Division	009 - WKG Division	201903	Addition	37602	050.49278	PRP.2734.N. Main St.FY19	System Integrity	2609-KY PRP-Mains	(2,723.76)
050 Mid-States Division	009 - WKG Division	201903	Retirement	37601	050.50491	PRP.2734.Cherry Dr Retire CC	System Integrity	2609-KY PRP-Mains	(1,845.26)
050 Mid-States Division	009 - WKG Division	201904	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	149,824.24
050 Mid-States Division	009 - WKG Division	201904	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(8,500.46)
050 Mid-States Division	009 - WKG Division	201904	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(82.63)
050 Mid-States Division	009 - WKG Division	201904	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	98,443.49
050 Mid-States Division	009 - WKG Division	201904	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	268,967.27
050 Mid-States Division	009 - WKG Division	201904	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	226,624.18
050 Mid-States Division	009 - WKG Division	201904	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	277.84
050 Mid-States Division	009 - WKG Division	201904	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	3,669.61
050 Mid-States Division	009 - WKG Division	201904	Addition	38000	050.26300	MayfieldPRPServices	System Integrity	2610-KY PRP-Services	8.89
050 Mid-States Division	009 - WKG Division	201904	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	68,907.97
050 Mid-States Division	009 - WKG Division	201904	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	15,846.98
050 Mid-States Division	009 - WKG Division	201904	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	159,573.52
050 Mid-States Division	009 - WKG Division	201904	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	277.34
050 Mid-States Division	009 - WKG Division	201904	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1.37

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201904	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1,372.99
050 Mid-States Division	009 - WKG Division	201904	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	7,297.48
050 Mid-States Division	009 - WKG Division	201904	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	4,253.51
050 Mid-States Division	009 - WKG Division	201904	Addition	37402	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	343.24
050 Mid-States Division	009 - WKG Division	201904	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1.37
050 Mid-States Division	009 - WKG Division	201904	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	6.86
050 Mid-States Division	009 - WKG Division	201904	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1.37
050 Mid-States Division	009 - WKG Division	201904	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	2.74
050 Mid-States Division	009 - WKG Division	201904	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1.37
050 Mid-States Division	009 - WKG Division	201904	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	6.86
050 Mid-States Division	009 - WKG Division	201904	Addition	38300	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	2.74
050 Mid-States Division	009 - WKG Division	201904	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	16.47
050 Mid-States Division	009 - WKG Division	201904	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	137.30
050 Mid-States Division	009 - WKG Division	201904	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	6.86
050 Mid-States Division	009 - WKG Division	201904	Retirement	37602	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(2,519.69)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37602	050.45376	PRP.2736.Kirkman-Liberty	System Integrity	2609-KY PRP-Mains	(4,784.17)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37602	050.48307	PRP.2636.East 7th St	System Integrity	2609-KY PRP-Mains	(6,712.94)
050 Mid-States Division	009 - WKG Division	201904	Addition	37602	050.48635	PRP.2634.Sugg St	System Integrity	2609-KY PRP-Mains	324,015.36
050 Mid-States Division	009 - WKG Division	201904	Retirement	37601	050.48635	PRP.2634.Sugg St	System Integrity	2609-KY PRP-Mains	(4,574.68)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37601	050.48635	PRP.2634.Sugg St	System Integrity	2609-KY PRP-Mains	(10,337.01)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37601	050.48635	PRP.2634.Sugg St	System Integrity	2609-KY PRP-Mains	(549.46)
050 Mid-States Division	009 - WKG Division	201904	Addition	37602	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	(193.01)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37602	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	(5,102.61)
050 Mid-States Division	009 - WKG Division	201904	Addition	37602	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	350,871.98
050 Mid-States Division	009 - WKG Division	201904	Retirement	37601	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	(2,283.86)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37601	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	(12,620.90)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37602	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	(2,957.05)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37601	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	(8,228.69)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37601	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	(1,767.08)
050 Mid-States Division	009 - WKG Division	201904	Addition	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	669,383.70
050 Mid-States Division	009 - WKG Division	201904	Retirement	37601	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	(30,176.93)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37601	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	(12,740.23)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	(4,252.03)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	(1,672.52)
050 Mid-States Division	009 - WKG Division	201904	Addition	37602	050.49278	PRP.2734.N. Main St.FY19	System Integrity	2609-KY PRP-Mains	(218,597.67)
050 Mid-States Division	009 - WKG Division	201904	Addition	37602	050.49278	PRP.2734.N. Main St.FY19	System Integrity	2609-KY PRP-Mains	219,121.52
050 Mid-States Division	009 - WKG Division	201904	Retirement	37602	050.49278	PRP.2734.N. Main St.FY19	System Integrity	2609-KY PRP-Mains	(1,481.09)
050 Mid-States Division	009 - WKG Division	201904	Addition	37602	050.50294	PRP.2636.Ford - Robin Rd	System Integrity	2609-KY PRP-Mains	63,093.27
050 Mid-States Division	009 - WKG Division	201904	Retirement	37602	050.50294	PRP.2636.Ford - Robin Rd	System Integrity	2609-KY PRP-Mains	(313.05)
050 Mid-States Division	009 - WKG Division	201904	Retirement	37601	050.50294	PRP.2636.Ford - Robin Rd	System Integrity	2609-KY PRP-Mains	(4,636.23)
050 Mid-States Division	009 - WKG Division	201904	Addition	37600	050.50491	PRP.2734.Cherry Dr Retire CC	System Integrity	2609-KY PRP-Mains	2,072.39
050 Mid-States Division	009 - WKG Division	201905	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	188,649.76
050 Mid-States Division	009 - WKG Division	201905	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	95,524.81
050 Mid-States Division	009 - WKG Division	201905	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	148,418.95
050 Mid-States Division	009 - WKG Division	201905	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	223,398.92
050 Mid-States Division	009 - WKG Division	201905	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	20,943.77
050 Mid-States Division	009 - WKG Division	201905	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(91.13)
050 Mid-States Division	009 - WKG Division	201905	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	44,732.45
050 Mid-States Division	009 - WKG Division	201905	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	68,444.60
050 Mid-States Division	009 - WKG Division	201905	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(3,034.88)
050 Mid-States Division	009 - WKG Division	201905	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(8,585.95)
050 Mid-States Division	009 - WKG Division	201905	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(43,156.93)
050 Mid-States Division	009 - WKG Division	201905	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(9,425.82)
050 Mid-States Division	009 - WKG Division	201905	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	214,146.62
050 Mid-States Division	009 - WKG Division	201905	Addition	38000	050.26312	ShelbyvillePRPServices	System Integrity	2610-KY PRP-Services	8,386.26
050 Mid-States Division	009 - WKG Division	201905	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	19.36
050 Mid-States Division	009 - WKG Division	201905	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.97
050 Mid-States Division	009 - WKG Division	201905	Addition	38300	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.39
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	193.57
050 Mid-States Division	009 - WKG Division	201905	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.97
050 Mid-States Division	009 - WKG Division	201905	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.20
050 Mid-States Division	009 - WKG Division	201905	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.20
050 Mid-States Division	009 - WKG Division	201905	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	1,028.77
050 Mid-States Division	009 - WKG Division	201905	Addition	37402	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	48.38
050 Mid-States Division	009 - WKG Division	201905	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.40
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	599.66
050 Mid-States Division	009 - WKG Division	201905	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.97
050 Mid-States Division	009 - WKG Division	201905	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.20
050 Mid-States Division	009 - WKG Division	201905	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	39.10
050 Mid-States Division	009 - WKG Division	201905	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	2.32
050 Mid-States Division	009 - WKG Division	201905	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	0.20

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201905	Addition	37401	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	10,130,692.47
050 Mid-States Division	009 - WKG Division	201905	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	10,130,692.40
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.48635	PRP.2634.Sugg St	System Integrity	2609-KY PRP-Mains	64,803.07
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.48635	PRP.2634.Sugg St	System Integrity	2609-KY PRP-Mains	259,212.29
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.48635	PRP.2634.Sugg St	System Integrity	2609-KY PRP-Mains	(324,015.36)
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	453,853.93
050 Mid-States Division	009 - WKG Division	201905	Retirement	37601	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	(47.67)
050 Mid-States Division	009 - WKG Division	201905	Retirement	37601	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	(1,523.04)
050 Mid-States Division	009 - WKG Division	201905	Retirement	37601	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	(24,567.90)
050 Mid-States Division	009 - WKG Division	201905	Retirement	37601	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	(892.05)
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	168,171.88
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	(280,327.27)
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	112,114.59
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	17,993.60
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	3,012.43
050 Mid-States Division	009 - WKG Division	201905	Addition	37602	050.50294	PRP.2636.Ford - Robin Rd	System Integrity	2609-KY PRP-Mains	(165.14)
050 Mid-States Division	009 - WKG Division	201905	Addition	37600	050.50491	PRP.2734.Cherry Dr Retire CC	System Integrity	2609-KY PRP-Mains	254.96
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	111,903.81
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	108,642.58
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	159,965.02
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	200,891.51
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(166.88)
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	132,462.41
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	18,010.85
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(151,133.46)
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	659.84
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	29,848.66
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	1,580,009.28
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(2,158,646.61)
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	2,474.33
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	243,342.71
050 Mid-States Division	009 - WKG Division	201906	Addition	38300	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	485,294.08
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	113,448.47
050 Mid-States Division	009 - WKG Division	201906	Addition	38000	050.26312	ShelbyvillePRPServices	System Integrity	2610-KY PRP-Services	(70.52)
050 Mid-States Division	009 - WKG Division	201906	Addition	37402	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(3.29)
050 Mid-States Division	009 - WKG Division	201906	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.02)
050 Mid-States Division	009 - WKG Division	201906	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.04)
050 Mid-States Division	009 - WKG Division	201906	Addition	38300	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.02)
050 Mid-States Division	009 - WKG Division	201906	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.07)
050 Mid-States Division	009 - WKG Division	201906	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(1.31)
050 Mid-States Division	009 - WKG Division	201906	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(2.66)
050 Mid-States Division	009 - WKG Division	201906	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(69.99)
050 Mid-States Division	009 - WKG Division	201906	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.02)
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(13.17)
050 Mid-States Division	009 - WKG Division	201906	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.07)
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(40.80)
050 Mid-States Division	009 - WKG Division	201906	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.02)
050 Mid-States Division	009 - WKG Division	201906	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.07)
050 Mid-States Division	009 - WKG Division	201906	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.16)
050 Mid-States Division	009 - WKG Division	201906	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.02)
050 Mid-States Division	009 - WKG Division	201906	Addition	37401	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	5,595.47
050 Mid-States Division	009 - WKG Division	201906	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	5,595.46
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.44843	PRP.2637.Lone Oak	System Integrity	2609-KY PRP-Mains	199.63
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.44843	PRP.2637.Lone Oak	System Integrity	2609-KY PRP-Mains	163.33
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.46525	PRP.2637.Trimble Hill	System Integrity	2609-KY PRP-Mains	1,574.92
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.46525	PRP.2637.Trimble Hill	System Integrity	2609-KY PRP-Mains	8,525.58
050 Mid-States Division	009 - WKG Division	201906	Addition	37402	050.46525	PRP.2637.Trimble Hill	System Integrity	2609-KY PRP-Mains	398.98
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	1,363.11
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	408.94
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.47885	PRP.2637.Clark St Phase 2	System Integrity	2609-KY PRP-Mains	954.20
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	57,837.11
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	(1.12)
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49146	PRP.2734.Boatlanding Rd.FY19	System Integrity	2609-KY PRP-Mains	(1.68)
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	308,903.29
050 Mid-States Division	009 - WKG Division	201906	Retirement	37601	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	(8,257.61)
050 Mid-States Division	009 - WKG Division	201906	Retirement	37800	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	(69.79)
050 Mid-States Division	009 - WKG Division	201906	Retirement	37601	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	(8,972.95)
050 Mid-States Division	009 - WKG Division	201906	Retirement	37800	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	(322.16)
050 Mid-States Division	009 - WKG Division	201906	Retirement	37601	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	(2,022.11)
050 Mid-States Division	009 - WKG Division	201906	Retirement	37800	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	(84.86)
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	449.37

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	129,392.16
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	117,069.10
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	(672,396.13)
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	369,691.88
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49278	PRP.2734.N. Main St.FY19	System Integrity	2609-KY PRP-Mains	(4,41)
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	57,201.80
050 Mid-States Division	009 - WKG Division	201906	Retirement	37601	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(8,147.57)
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.50294	PRP.2636.Ford - Robin Rd	System Integrity	2609-KY PRP-Mains	(85.53)
050 Mid-States Division	009 - WKG Division	201906	Addition	37600	050.50491	PRP.2734.Cherry Dr Retire CC	System Integrity	2609-KY PRP-Mains	(2,327.35)
050 Mid-States Division	009 - WKG Division	201906	Addition	37600	050.50491	PRP.2734.Cherry Dr Retire CC	System Integrity	2609-KY PRP-Mains	2,406.16
050 Mid-States Division	009 - WKG Division	201906	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	257,434.00
050 Mid-States Division	009 - WKG Division	201906	Retirement	37601	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	(2,790.81)
050 Mid-States Division	009 - WKG Division	201906	Retirement	37601	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	(11,351.09)
050 Mid-States Division	009 - WKG Division	201907	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	120,474.66
050 Mid-States Division	009 - WKG Division	201907	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	69,923.91
050 Mid-States Division	009 - WKG Division	201907	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	187,223.34
050 Mid-States Division	009 - WKG Division	201907	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	117,988.51
050 Mid-States Division	009 - WKG Division	201907	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	5.02
050 Mid-States Division	009 - WKG Division	201907	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	12.56
050 Mid-States Division	009 - WKG Division	201907	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	50,555.14
050 Mid-States Division	009 - WKG Division	201907	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	111,288.48
050 Mid-States Division	009 - WKG Division	201907	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	447,289.93
050 Mid-States Division	009 - WKG Division	201907	Addition	38000	050.26312	ShelbyvillePRPServices	System Integrity	2610-KY PRP-Services	3,958.83
050 Mid-States Division	009 - WKG Division	201907	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	366,461.24
050 Mid-States Division	009 - WKG Division	201907	Addition	37401	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	366,461.25
050 Mid-States Division	009 - WKG Division	201907	Retirement	37905	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(3,170.10)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(15,111.15)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(135.19)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(157,958.32)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(3,276.74)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(1,360.35)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(85,776.82)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(103.49)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(137.74)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(4,660.76)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(1,034.43)
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	27,983.68
050 Mid-States Division	009 - WKG Division	201907	Retirement	37602	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	(4,167.76)
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	(382.76)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37602	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	(169.59)
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	(369,314.95)
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	369,314.95
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	42.37
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	13.42
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.49277	PRP.2636.Carter-Bosley Rd.19	System Integrity	2609-KY PRP-Mains	14.83
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	103,369.35
050 Mid-States Division	009 - WKG Division	201907	Retirement	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(423.14)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(2,057.60)
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.50294	PRP.2636.Ford - Robin Rd	System Integrity	2609-KY PRP-Mains	62,879.18
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.50294	PRP.2636.Ford - Robin Rd	System Integrity	2609-KY PRP-Mains	(62,842.60)
050 Mid-States Division	009 - WKG Division	201907	Addition	37600	050.50491	PRP.2734.Cherry Dr Retire CC	System Integrity	2609-KY PRP-Mains	78.26
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	697.63
050 Mid-States Division	009 - WKG Division	201907	Retirement	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	(216.32)
050 Mid-States Division	009 - WKG Division	201907	Addition	37602	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	148,007.69
050 Mid-States Division	009 - WKG Division	201907	Retirement	37601	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	(47.36)
050 Mid-States Division	009 - WKG Division	201907	Retirement	37601	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	(5,149.36)
050 Mid-States Division	009 - WKG Division	201908	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	212,503.56
050 Mid-States Division	009 - WKG Division	201908	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(45.63)
050 Mid-States Division	009 - WKG Division	201908	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(21,514.21)
050 Mid-States Division	009 - WKG Division	201908	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	144,480.29
050 Mid-States Division	009 - WKG Division	201908	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	128,292.66
050 Mid-States Division	009 - WKG Division	201908	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	558,738.20
050 Mid-States Division	009 - WKG Division	201908	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	812.58
050 Mid-States Division	009 - WKG Division	201908	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(2.19)
050 Mid-States Division	009 - WKG Division	201908	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(51,255.47)
050 Mid-States Division	009 - WKG Division	201908	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(125,480.23)
050 Mid-States Division	009 - WKG Division	201908	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	86,551.49
050 Mid-States Division	009 - WKG Division	201908	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(11,926.78)
050 Mid-States Division	009 - WKG Division	201908	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	154,955.07
050 Mid-States Division	009 - WKG Division	201908	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	27,751.65
050 Mid-States Division	009 - WKG Division	201908	Addition	38000	050.26312	ShelbyvillePRPServices	System Integrity	2610-KY PRP-Services	10,069.39



Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201908	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(171.70)
050 Mid-States Division	009 - WKG Division	201908	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(4.25)
050 Mid-States Division	009 - WKG Division	201908	Addition	37402	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(212.50)
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(2,633.30)
050 Mid-States Division	009 - WKG Division	201908	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(4.25)
050 Mid-States Division	009 - WKG Division	201908	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(4.25)
050 Mid-States Division	009 - WKG Division	201908	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.85)
050 Mid-States Division	009 - WKG Division	201908	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.85)
050 Mid-States Division	009 - WKG Division	201908	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.85)
050 Mid-States Division	009 - WKG Division	201908	Addition	37800	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(1.70)
050 Mid-States Division	009 - WKG Division	201908	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(0.85)
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(850.00)
050 Mid-States Division	009 - WKG Division	201908	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(10.20)
050 Mid-States Division	009 - WKG Division	201908	Addition	37900	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(85.00)
050 Mid-States Division	009 - WKG Division	201908	Addition	37601	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(4,517.75)
050 Mid-States Division	009 - WKG Division	201908	Addition	38300	050.44133	PRP.2635.Marion to Fredonia	System Integrity	2609-KY PRP-Mains	(1.70)
050 Mid-States Division	009 - WKG Division	201908	Addition	38300	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	2,100.47
050 Mid-States Division	009 - WKG Division	201908	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	12,602.95
050 Mid-States Division	009 - WKG Division	201908	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(10,502,749.10)
050 Mid-States Division	009 - WKG Division	201908	Addition	37401	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	378,089.35
050 Mid-States Division	009 - WKG Division	201908	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	2,100.47
050 Mid-States Division	009 - WKG Division	201908	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	275,165.01
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	485,214.67
050 Mid-States Division	009 - WKG Division	201908	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	8,401.93
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	2,100.47
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	275,165.01
050 Mid-States Division	009 - WKG Division	201908	Addition	37401	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(10,502,749.19)
050 Mid-States Division	009 - WKG Division	201908	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	19,036,799.89
050 Mid-States Division	009 - WKG Division	201908	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	2,100.47
050 Mid-States Division	009 - WKG Division	201908	Addition	37900	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	228,954.31
050 Mid-States Division	009 - WKG Division	201908	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	296,170.00
050 Mid-States Division	009 - WKG Division	201908	Retirement	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(655.72)
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	(539,674.72)
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	540,823.98
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	805.87
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	(308,520.53)
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	305,375.91
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	3,084.60
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(496.69)
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	552,660.68
050 Mid-States Division	009 - WKG Division	201908	Retirement	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(11,604.42)
050 Mid-States Division	009 - WKG Division	201908	Retirement	37601	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(1,265.72)
050 Mid-States Division	009 - WKG Division	201908	Retirement	37601	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(7,666.71)
050 Mid-States Division	009 - WKG Division	201908	Retirement	37601	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(14,063.93)
050 Mid-States Division	009 - WKG Division	201908	Retirement	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(1,931.13)
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	187,628.74
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	70,073.00
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	(258,131.63)
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	145,714.56
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	9,766.07
050 Mid-States Division	009 - WKG Division	201908	Addition	37602	050.51484	PRP.2636.Hwy 231	System Integrity	2609-KY PRP-Mains	87,993.41
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	1,242,799.29
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(783,356.03)
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	8,818.55
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	167,585.34
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	578,899.72
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(517,015.08)
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	907,423.38
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(892,867.24)
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	12,705.55
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	2,076,133.61
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(1,327,641.32)
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	33,195.21
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.26300	MayfieldPRPServices	System Integrity	2610-KY PRP-Services	79.76
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(380,528.96)
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	429,340.37
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	236,714.38
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	57,373.79
050 Mid-States Division	009 - WKG Division	201909	Addition	38000	050.26312	ShelbyvillePRPServices	System Integrity	2610-KY PRP-Services	4,465.19
050 Mid-States Division	009 - WKG Division	201909	Addition	37401	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	2,163.31
050 Mid-States Division	009 - WKG Division	201909	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	48.07

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201909	Addition	37900	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	1,310.00
050 Mid-States Division	009 - WKG Division	201909	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	12.02
050 Mid-States Division	009 - WKG Division	201909	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	12.02
050 Mid-States Division	009 - WKG Division	201909	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	1,574.41
050 Mid-States Division	009 - WKG Division	201909	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	108,922.41
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	12.02
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	2,776.24
050 Mid-States Division	009 - WKG Division	201909	Addition	38300	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	12.02
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	1,574.41
050 Mid-States Division	009 - WKG Division	201909	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	1,694.58
050 Mid-States Division	009 - WKG Division	201909	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	72.12
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.47397	PRP.2637.Mississippi Georgia	System Integrity	2609-KY PRP-Mains	473,201.96
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	836,436.04
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	(1.72)
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.49142	PRP.2734.Nutwood E 10th.FY19	System Integrity	2609-KY PRP-Mains	(1,156.06)
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	553,243.06
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	0.37
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.49189	PRP.2735.Bowen - Frazier.FY19	System Integrity	2609-KY PRP-Mains	37.24
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	683,514.42
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	965,426.55
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	156,255.73
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(160,074.46)
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	756.14
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	264,387.44
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(53.90)
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.50294	PRP.2636.Ford - Robin Rd	System Integrity	2609-KY PRP-Mains	(0.01)
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.50374	PRP.2737.KY 33 Burgin	System Integrity	2609-KY PRP-Mains	287,965.93
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	527.77
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	197.10
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	649,226.72
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	2,191.74
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	624,540.58
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	1,350.08
050 Mid-States Division	009 - WKG Division	201909	Addition	37602	050.51484	PRP.2636.Hwy 231	System Integrity	2609-KY PRP-Mains	3,529.11
050 Mid-States Division	009 - WKG Division	201910	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	59,520.66
050 Mid-States Division	009 - WKG Division	201910	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(50,788.41)
050 Mid-States Division	009 - WKG Division	201910	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	1.63
050 Mid-States Division	009 - WKG Division	201910	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	12,687.06
050 Mid-States Division	009 - WKG Division	201910	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	46,066.22
050 Mid-States Division	009 - WKG Division	201910	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(69,976.03)
050 Mid-States Division	009 - WKG Division	201910	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	8.63
050 Mid-States Division	009 - WKG Division	201910	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(346.89)
050 Mid-States Division	009 - WKG Division	201910	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	189,163.70
050 Mid-States Division	009 - WKG Division	201910	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	1.05
050 Mid-States Division	009 - WKG Division	201910	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(628.69)
050 Mid-States Division	009 - WKG Division	201910	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(7,270.29)
050 Mid-States Division	009 - WKG Division	201910	Addition	38000	050.26300	MayfieldPRPServices	System Integrity	2610-KY PRP-Services	309.91
050 Mid-States Division	009 - WKG Division	201910	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	36,426.75
050 Mid-States Division	009 - WKG Division	201910	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	216,457.40
050 Mid-States Division	009 - WKG Division	201910	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	32,617.32
050 Mid-States Division	009 - WKG Division	201910	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(1,560.29)
050 Mid-States Division	009 - WKG Division	201910	Addition	38000	050.26312	ShelbyvillePRPServices	System Integrity	2610-KY PRP-Services	1,997.79
050 Mid-States Division	009 - WKG Division	201910	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(1.08)
050 Mid-States Division	009 - WKG Division	201910	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(1,616.70)
050 Mid-States Division	009 - WKG Division	201910	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(23.39)
050 Mid-States Division	009 - WKG Division	201910	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(0.19)
050 Mid-States Division	009 - WKG Division	201910	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(25.15)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(41.22)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(23.39)
050 Mid-States Division	009 - WKG Division	201910	Addition	38300	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(0.19)
050 Mid-States Division	009 - WKG Division	201910	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(0.73)
050 Mid-States Division	009 - WKG Division	201910	Addition	37401	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(32.11)
050 Mid-States Division	009 - WKG Division	201910	Addition	37900	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(19.45)
050 Mid-States Division	009 - WKG Division	201910	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(0.19)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(0.19)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.47397	PRP.2637.Mississippi Georgia	System Integrity	2609-KY PRP-Mains	5,038.78
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	5,909.11
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	2,795.73
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	(33,769.83)
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	(2,409.10)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	28,469.24

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	1,999.12
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(944.68)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(4.58)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	33,827.29
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	(8,268.53)
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	(25,371.00)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	446,619.80
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(552,606.78)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	104,762.68
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50374	PRP.2737.KY 33 Burgin	System Integrity	2609-KY PRP-Mains	2,516.80
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	(190.79)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	(510.84)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	64,197.60
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	(11,173.51)
050 Mid-States Division	009 - WKG Division	201910	Retirement	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	(17,836.43)
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	(3,985.37)
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	(26,922.62)
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	(450.37)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	14,438.29
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	129,944.60
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	(147,906.30)
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	(917.50)
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	(11,339.21)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	2,682.92
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	(159,123.84)
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	154,461.65
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	2,117.71
050 Mid-States Division	009 - WKG Division	201910	Addition	37602	050.51484	PRP.2636.Hwy 231	System Integrity	2609-KY PRP-Mains	1,484.96
050 Mid-States Division	009 - WKG Division	201910	Retirement	37601	050.51484	PRP.2636.Hwy 231	System Integrity	2609-KY PRP-Mains	(1,957.87)
050 Mid-States Division	009 - WKG Division	201911	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	49,842.81
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(13.49)
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(22,163.93)
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(254,330.51)
050 Mid-States Division	009 - WKG Division	201911	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	3,365.85
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(31,429.17)
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	2.64
050 Mid-States Division	009 - WKG Division	201911	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	75,576.75
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(6,269.41)
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(9,324.05)
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(4,727.72)
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	90.63
050 Mid-States Division	009 - WKG Division	201911	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	91,701.92
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	1.05
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(11,246.74)
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(9,814.15)
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(39,964.34)
050 Mid-States Division	009 - WKG Division	201911	Addition	38000	050.26300	MayfieldPRPServices	System Integrity	2610-KY PRP-Services	9.67
050 Mid-States Division	009 - WKG Division	201911	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	25,404.40
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(32,199.06)
050 Mid-States Division	009 - WKG Division	201911	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	69,569.13
050 Mid-States Division	009 - WKG Division	201911	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	89,851.59
050 Mid-States Division	009 - WKG Division	201911	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(5,043.47)
050 Mid-States Division	009 - WKG Division	201911	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	698.78
050 Mid-States Division	009 - WKG Division	201911	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	4.96
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	649.22
050 Mid-States Division	009 - WKG Division	201911	Addition	37401	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	892.05
050 Mid-States Division	009 - WKG Division	201911	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	4.96
050 Mid-States Division	009 - WKG Division	201911	Addition	37900	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	540.19
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	4.96
050 Mid-States Division	009 - WKG Division	201911	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	649.22
050 Mid-States Division	009 - WKG Division	201911	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	44,915.16
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	1,144.81
050 Mid-States Division	009 - WKG Division	201911	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	19.82
050 Mid-States Division	009 - WKG Division	201911	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	29.74
050 Mid-States Division	009 - WKG Division	201911	Addition	38300	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	4.96
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.47397	PRP.2637.Mississippi Georgia	System Integrity	2609-KY PRP-Mains	1,029.27
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	555,502.35
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	(556,038.79)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	(1,062.10)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	(702.82)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(81.67)

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(0.39)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	3,045.28
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	284,945.25
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	(298,214.73)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(85.49)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(20.05)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50374	PRP.2737.KY 33 Burgin	System Integrity	2609-KY PRP-Mains	(290,482.73)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50374	PRP.2737.KY 33 Burgin	System Integrity	2609-KY PRP-Mains	290,563.11
050 Mid-States Division	009 - WKG Division	201911	Retirement	37602	050.50374	PRP.2737.KY 33 Burgin	System Integrity	2609-KY PRP-Mains	(54,707.72)
050 Mid-States Division	009 - WKG Division	201911	Retirement	37601	050.50374	PRP.2737.KY 33 Burgin	System Integrity	2609-KY PRP-Mains	(16,127.30)
050 Mid-States Division	009 - WKG Division	201911	Retirement	37601	050.50374	PRP.2737.KY 33 Burgin	System Integrity	2609-KY PRP-Mains	(1,338.71)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	(44.32)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	(16.56)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	162,840.65
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	(713,424.32)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	651,362.61
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	(32.03)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	(288.22)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	(452.30)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	(221.89)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	(3.04)
050 Mid-States Division	009 - WKG Division	201911	Addition	37602	050.51484	PRP.2636.Hwy 231	System Integrity	2609-KY PRP-Mains	44.62
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	158,396.39
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(109,363.47)
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	1,832.70
050 Mid-States Division	009 - WKG Division	201912	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(2,848.74)
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	32,944.28
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	1,621.74
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(16,052.91)
050 Mid-States Division	009 - WKG Division	201912	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(59,374.17)
050 Mid-States Division	009 - WKG Division	201912	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	5.28
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	269,014.59
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(121,642.97)
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	19,587.75
050 Mid-States Division	009 - WKG Division	201912	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(526.90)
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	330,236.68
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(280,865.62)
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	1,240.97
050 Mid-States Division	009 - WKG Division	201912	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(5,691.16)
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	21,059.75
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(21,059.75)
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.26300	MayfieldPRPServices	System Integrity	2610-KY PRP-Services	8.51
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	83,734.52
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(61,831.15)
050 Mid-States Division	009 - WKG Division	201912	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(575.26)
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	75,343.22
050 Mid-States Division	009 - WKG Division	201912	Addition	38300	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	90,116.15
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	217,632.98
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	948,455.72
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(1,142,052.89)
050 Mid-States Division	009 - WKG Division	201912	Addition	38000	050.26312	ShelbyvillePRPServices	System Integrity	2610-KY PRP-Services	(47.80)
050 Mid-States Division	009 - WKG Division	201912	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(0.37)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(0.37)
050 Mid-States Division	009 - WKG Division	201912	Addition	37401	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(65.76)
050 Mid-States Division	009 - WKG Division	201912	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(47.86)
050 Mid-States Division	009 - WKG Division	201912	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(1.47)
050 Mid-States Division	009 - WKG Division	201912	Addition	37900	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(39.81)
050 Mid-States Division	009 - WKG Division	201912	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(3,310.45)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(47.86)
050 Mid-States Division	009 - WKG Division	201912	Addition	37601	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(2.20)
050 Mid-States Division	009 - WKG Division	201912	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(51.51)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(84.38)
050 Mid-States Division	009 - WKG Division	201912	Addition	38300	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(0.37)
050 Mid-States Division	009 - WKG Division	201912	Addition	37800	050.44145	PRP.2738.Springfield Calvary	System Integrity	2609-KY PRP-Mains	(0.37)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.47397	PRP.2637.Mississippi Georgia	System Integrity	2609-KY PRP-Mains	(389.25)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	(141.30)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	(180.00)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	(710,921.56)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	710,259.96
050 Mid-States Division	009 - WKG Division	201912	Retirement	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	(1,137.19)
050 Mid-States Division	009 - WKG Division	201912	Retirement	37601	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	(11,739.79)

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	201912	Retirement	37601	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	(12,604.91)
050 Mid-States Division	009 - WKG Division	201912	Retirement	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	(10,747.35)
050 Mid-States Division	009 - WKG Division	201912	Retirement	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	(0.27)
050 Mid-States Division	009 - WKG Division	201912	Retirement	37601	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	(5,792.20)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	31.20
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(0.10)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.49441	PRP.2734.WKU Normal Dr	System Integrity	2609-KY PRP-Mains	(19.71)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	(684.97)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	(7.33)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(19.66)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50079	PRP.2734.Stuart Ave	System Integrity	2609-KY PRP-Mains	(4.60)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50374	PRP.2737.KY 33 Burgin	System Integrity	2609-KY PRP-Mains	70.80
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	(10.69)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50593	PRP.2636.Eastwood Dr	System Integrity	2609-KY PRP-Mains	(4.00)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	19,059.79
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	76,239.22
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	(7.07)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	(63.62)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	4,939.72
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	(51.04)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.51081	PRP.2636.E 20th and Allen	System Integrity	2609-KY PRP-Mains	(0.70)
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.51484	PRP.2636.Hwy 231	System Integrity	2609-KY PRP-Mains	39.29
050 Mid-States Division	009 - WKG Division	201912	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	263,566.85
050 Mid-States Division	009 - WKG Division	202001	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	50,690.13
050 Mid-States Division	009 - WKG Division	202001	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(2,295.74)
050 Mid-States Division	009 - WKG Division	202001	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	5,625.70
050 Mid-States Division	009 - WKG Division	202001	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	220,772.43
050 Mid-States Division	009 - WKG Division	202001	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(231.26)
050 Mid-States Division	009 - WKG Division	202001	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(14,438.13)
050 Mid-States Division	009 - WKG Division	202001	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	1.00
050 Mid-States Division	009 - WKG Division	202001	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	119,762.78
050 Mid-States Division	009 - WKG Division	202001	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	2.24
050 Mid-States Division	009 - WKG Division	202001	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(15,964.09)
050 Mid-States Division	009 - WKG Division	202001	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	1,819.38
050 Mid-States Division	009 - WKG Division	202001	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	70,247.72
050 Mid-States Division	009 - WKG Division	202001	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(24,838.11)
050 Mid-States Division	009 - WKG Division	202001	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	6.12
050 Mid-States Division	009 - WKG Division	202001	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	7,976.22
050 Mid-States Division	009 - WKG Division	202001	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	173,786.28
050 Mid-States Division	009 - WKG Division	202001	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(1.32)
050 Mid-States Division	009 - WKG Division	202001	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(5,307.80)
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.47397	PRP.2637.Mississippi Georgia	System Integrity	2609-KY PRP-Mains	492,289.39
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.47397	PRP.2637.Mississippi Georgia	System Integrity	2609-KY PRP-Mains	(478,880.76)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.47397	PRP.2637.Mississippi Georgia	System Integrity	2609-KY PRP-Mains	(55,877.66)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.47397	PRP.2637.Mississippi Georgia	System Integrity	2609-KY PRP-Mains	(29,904.78)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.47397	PRP.2637.Mississippi Georgia	System Integrity	2609-KY PRP-Mains	2.37
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	202,421.64
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	639,782.21
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	(842,203.85)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37602	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	(28,364.18)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	(3,020.32)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	(27,719.60)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37602	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	(3,400.68)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	(18,255.04)
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	29.89
050 Mid-States Division	009 - WKG Division	202001	Retirement	37602	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	0.05
050 Mid-States Division	009 - WKG Division	202001	Retirement	37602	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	(8,572.44)
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	903.61
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	24,049.57
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	(966,754.05)
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	19,387.71
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	949,998.15
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	(5,864.75)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	(17,092.34)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	(7,944.09)
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	0.22
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	19.39
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	11.53
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	46.10
050 Mid-States Division	009 - WKG Division	202001	Retirement	37602	050.50792	PRP.2636.Glenn Ct	System Integrity	2609-KY PRP-Mains	(345.65)
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	38,581.54

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	(55,223.50)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	(32,761.45)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	(88.07)
050 Mid-States Division	009 - WKG Division	202001	Retirement	37601	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	2.37
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.51484	PRP.2636.Hwy 231	System Integrity	2609-KY PRP-Mains	92,160.50
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.51484	PRP.2636.Hwy 231	System Integrity	2609-KY PRP-Mains	(93,091.39)
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.51484	PRP.2636.Hwy 231	System Integrity	2609-KY PRP-Mains	930.89
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	24,873.29
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	443,352.51
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	398,372.19
050 Mid-States Division	009 - WKG Division	202001	Addition	37602	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	67,745.49
050 Mid-States Division	009 - WKG Division	202001	Addition	37601	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	115,298.76
050 Mid-States Division	009 - WKG Division	202001	Addition	37800	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	4,878.26
050 Mid-States Division	009 - WKG Division	202002	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	153,153.05
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(52.31)
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(3,161.20)
050 Mid-States Division	009 - WKG Division	202002	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	7,657.53
050 Mid-States Division	009 - WKG Division	202002	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	139,273.16
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	3.00
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(1,850.08)
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(43,779.84)
050 Mid-States Division	009 - WKG Division	202002	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	102,799.72
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	2.24
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(6,567.01)
050 Mid-States Division	009 - WKG Division	202002	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	20,868.02
050 Mid-States Division	009 - WKG Division	202002	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	17,684.69
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(680,769.25)
050 Mid-States Division	009 - WKG Division	202002	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	6,047.39
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(19,905.29)
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(1,307.32)
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	0.46
050 Mid-States Division	009 - WKG Division	202002	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	105,792.29
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(3,273.34)
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	3.76
050 Mid-States Division	009 - WKG Division	202002	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(49,164.61)
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	13,169.13
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	10,511.73
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	2,751.50
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	56.14
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.50374	PRP.2737.KY 33 Burgin	System Integrity	2609-KY PRP-Mains	20,597.06
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	6,930.27
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	5,177.64
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	8,712.00
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	95,937.37
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	10,396.34
050 Mid-States Division	009 - WKG Division	202002	Addition	37800	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	748.62
050 Mid-States Division	009 - WKG Division	202002	Addition	37601	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	17,693.96
050 Mid-States Division	009 - WKG Division	202002	Addition	37602	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	39,506.63
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(203,843.18)
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	408,594.96
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	2,519.37
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(26,945.89)
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	1.73
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(4,73)
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	22,666.11
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	426,743.14
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(360,045.59)
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(13,708.13)
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(809.41)
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	1.00
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	4,511.17
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	295,436.97
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(222,562.50)
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(43,806.51)
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	26.97
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	90,310.36
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	7,057.23
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(87,932.41)
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	101,498.73
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(4,864.38)
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	879,697.56

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(878,351.29)
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(63,696.76)
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(119,745.77)
050 Mid-States Division	009 - WKG Division	202003	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	0.46
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(279,578.57)
050 Mid-States Division	009 - WKG Division	202003	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	399,901.81
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.47397	PRP.2637.Mississippi Georgia	System Integrity	2609-KY PRP-Mains	357.90
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	47,192.62
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.47910	PRP.2736.East 13th Street	System Integrity	2609-KY PRP-Mains	14,931.35
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.49147	PRP.2734.Morgantown Rd.FY19	System Integrity	2609-KY PRP-Mains	351.57
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.49190	PRP.2637.Clark St Ph 1.FY19	System Integrity	2609-KY PRP-Mains	24.12
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.49315	PRP.2738.Robinson Ave.FY19	System Integrity	2609-KY PRP-Mains	920.36
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	243.59
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	11,936.26
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.50374	PRP.2737.KY 33 Burgin	System Integrity	2609-KY PRP-Mains	549.87
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	650,791.78
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	48,966.30
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	(677,222.73)
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	22,030.77
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	4,806.16
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	51,160.86
050 Mid-States Division	009 - WKG Division	202003	Addition	37800	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	41.52
050 Mid-States Division	009 - WKG Division	202003	Addition	37601	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	981.56
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	576.73
050 Mid-States Division	009 - WKG Division	202003	Retirement	37601	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	(2,666.18)
050 Mid-States Division	009 - WKG Division	202003	Retirement	37800	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	(227.35)
050 Mid-States Division	009 - WKG Division	202003	Retirement	37800	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	(86.80)
050 Mid-States Division	009 - WKG Division	202003	Retirement	37602	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	(5,418.55)
050 Mid-States Division	009 - WKG Division	202003	Retirement	37601	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	(2,145.20)
050 Mid-States Division	009 - WKG Division	202003	Retirement	37800	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	(671.40)
050 Mid-States Division	009 - WKG Division	202003	Retirement	37601	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	(1,878.73)
050 Mid-States Division	009 - WKG Division	202003	Addition	37602	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	73,835.29
050 Mid-States Division	009 - WKG Division	202004	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	166,318.74
050 Mid-States Division	009 - WKG Division	202004	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	8.39
050 Mid-States Division	009 - WKG Division	202004	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(82,555.20)
050 Mid-States Division	009 - WKG Division	202004	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	101,500.34
050 Mid-States Division	009 - WKG Division	202004	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	33,782.60
050 Mid-States Division	009 - WKG Division	202004	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(1,884.37)
050 Mid-States Division	009 - WKG Division	202004	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	156,397.24
050 Mid-States Division	009 - WKG Division	202004	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	82,907.35
050 Mid-States Division	009 - WKG Division	202004	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(17,830.31)
050 Mid-States Division	009 - WKG Division	202004	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	10.08
050 Mid-States Division	009 - WKG Division	202004	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	3,345.65
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.26302	GlasgowPRPMains	System Integrity	2609-KY PRP-Mains	2,738.03
050 Mid-States Division	009 - WKG Division	202004	Addition	37601	050.26302	GlasgowPRPMains	System Integrity	2609-KY PRP-Mains	33,293.31
050 Mid-States Division	009 - WKG Division	202004	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	12,215.70
050 Mid-States Division	009 - WKG Division	202004	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(21,608.57)
050 Mid-States Division	009 - WKG Division	202004	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	43,014.23
050 Mid-States Division	009 - WKG Division	202004	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(2.10)
050 Mid-States Division	009 - WKG Division	202004	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(6,831.24)
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	550.02
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	26,950.95
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	279.57
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	26,159.51
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	7,917.61
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	31,670.42
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	39,160.48
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	2,947.56
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	27,529.43
050 Mid-States Division	009 - WKG Division	202004	Retirement	37601	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	(12,355.83)
050 Mid-States Division	009 - WKG Division	202004	Retirement	37601	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	(9,785.38)
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	926.93
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	7,602.15
050 Mid-States Division	009 - WKG Division	202004	Addition	37800	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	10,921.42
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	80,818.39
050 Mid-States Division	009 - WKG Division	202004	Addition	37601	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	(133,974.28)
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	104,627.02
050 Mid-States Division	009 - WKG Division	202004	Addition	37601	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	21,842.81
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	(78,718.56)
050 Mid-States Division	009 - WKG Division	202004	Addition	37800	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	218.44
050 Mid-States Division	009 - WKG Division	202004	Addition	37800	050.51956	PRP.2735.Woodsonville	System Integrity	2609-KY PRP-Mains	(5,668.40)

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202004	Addition	37602	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	380.75
050 Mid-States Division	009 - WKG Division	202004	Retirement	37601	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	(2,866.80)
050 Mid-States Division	009 - WKG Division	202004	Retirement	37601	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	(132.94)
050 Mid-States Division	009 - WKG Division	202005	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	70,172.09
050 Mid-States Division	009 - WKG Division	202005	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(50,219.61)
050 Mid-States Division	009 - WKG Division	202005	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	142.52
050 Mid-States Division	009 - WKG Division	202005	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	43,073.44
050 Mid-States Division	009 - WKG Division	202005	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	2.86
050 Mid-States Division	009 - WKG Division	202005	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(11,894.73)
050 Mid-States Division	009 - WKG Division	202005	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	61,388.43
050 Mid-States Division	009 - WKG Division	202005	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	76,432.85
050 Mid-States Division	009 - WKG Division	202005	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(12.81)
050 Mid-States Division	009 - WKG Division	202005	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	30,752.73
050 Mid-States Division	009 - WKG Division	202005	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(1,950.32)
050 Mid-States Division	009 - WKG Division	202005	Addition	37601	050.26302	GlasgowPRPMains	System Integrity	2609-KY PRP-Mains	(33,293.31)
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.26302	GlasgowPRPMains	System Integrity	2609-KY PRP-Mains	(2,738.03)
050 Mid-States Division	009 - WKG Division	202005	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	64,921.93
050 Mid-States Division	009 - WKG Division	202005	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	2,188.10
050 Mid-States Division	009 - WKG Division	202005	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	176,387.35
050 Mid-States Division	009 - WKG Division	202005	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(1.32)
050 Mid-States Division	009 - WKG Division	202005	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(19,346.62)
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	598.06
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	2,392.28
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	28,525.44
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	2,147.07
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	192,323.24
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	157,355.38
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	(343,177.98)
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	61,524.11
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	517.71
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	112,984.48
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	(113,722.67)
050 Mid-States Division	009 - WKG Division	202005	Addition	37602	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	410.24
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	320,350.92
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(236,490.83)
050 Mid-States Division	009 - WKG Division	202006	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	1.73
050 Mid-States Division	009 - WKG Division	202006	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(15,672.78)
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	203,281.06
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	27,713.88
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(180,523.12)
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	98,008.41
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(232,830.09)
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	582,576.91
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	297,021.16
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(226,657.84)
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	93.91
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	48,933.69
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(19,214.00)
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	19,420.47
050 Mid-States Division	009 - WKG Division	202006	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(1,876.77)
050 Mid-States Division	009 - WKG Division	202006	Retirement	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	0.46
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	28,029.17
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	507,388.97
050 Mid-States Division	009 - WKG Division	202006	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(219,401.58)
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	756.42
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.49316	PRP.2737.W Maple Ave.FY19	System Integrity	2609-KY PRP-Mains	15.44
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	7.85
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.50035	PRP.2735.Milton Ave	System Integrity	2609-KY PRP-Mains	734.21
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	956.03
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.50739	PRP.2734.N Breathitt St	System Integrity	2609-KY PRP-Mains	239.00
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	142.87
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	1,898.29
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	1,145.21
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	1,399.68
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	1,031,378.83
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	46,878.35
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	35,116.82
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	46.69
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	0.16
050 Mid-States Division	009 - WKG Division	202006	Addition	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	256,833.32
050 Mid-States Division	009 - WKG Division	202007	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	167,572.85



Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	5.64
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(35,812.62)
050 Mid-States Division	009 - WKG Division	202007	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	48,721.44
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	19.46
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(45,536.99)
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(42,301.77)
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	14.30
050 Mid-States Division	009 - WKG Division	202007	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	94,168.84
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	0.12
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(41,467.97)
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(231.26)
050 Mid-States Division	009 - WKG Division	202007	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	170,023.69
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(13,325.67)
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	12.34
050 Mid-States Division	009 - WKG Division	202007	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	97,571.43
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(4,197.93)
050 Mid-States Division	009 - WKG Division	202007	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	400.18
050 Mid-States Division	009 - WKG Division	202007	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	101,062.98
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(4,709.70)
050 Mid-States Division	009 - WKG Division	202007	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	721.19
050 Mid-States Division	009 - WKG Division	202007	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	300,817.71
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(2.92)
050 Mid-States Division	009 - WKG Division	202007	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(54,105.72)
050 Mid-States Division	009 - WKG Division	202007	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	842.20
050 Mid-States Division	009 - WKG Division	202007	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	689.09
050 Mid-States Division	009 - WKG Division	202007	Addition	37602	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	1,009,376.23
050 Mid-States Division	009 - WKG Division	202007	Addition	37602	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	860.17
050 Mid-States Division	009 - WKG Division	202007	Addition	37602	050.51876	PRP.2738.W High St Lebanon	System Integrity	2609-KY PRP-Mains	1,127,530.80
050 Mid-States Division	009 - WKG Division	202007	Addition	37602	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	5,580.12
050 Mid-States Division	009 - WKG Division	202007	Retirement	37800	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	(20.71)
050 Mid-States Division	009 - WKG Division	202007	Retirement	37800	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	(212.14)
050 Mid-States Division	009 - WKG Division	202007	Retirement	37800	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	(55.93)
050 Mid-States Division	009 - WKG Division	202007	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	3,019.82
050 Mid-States Division	009 - WKG Division	202007	Addition	37602	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	0.06
050 Mid-States Division	009 - WKG Division	202007	Addition	37602	050.52961	PRP.2737.Somerset St	System Integrity	2609-KY PRP-Mains	18.71
050 Mid-States Division	009 - WKG Division	202007	Addition	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	15,339.02
050 Mid-States Division	009 - WKG Division	202007	Retirement	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	(62.65)
050 Mid-States Division	009 - WKG Division	202007	Retirement	37601	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	(16,696.97)
050 Mid-States Division	009 - WKG Division	202007	Retirement	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	(2,112.66)
050 Mid-States Division	009 - WKG Division	202007	Retirement	37601	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	(323.15)
050 Mid-States Division	009 - WKG Division	202008	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	308,967.01
050 Mid-States Division	009 - WKG Division	202008	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	42,936.59
050 Mid-States Division	009 - WKG Division	202008	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	119,171.52
050 Mid-States Division	009 - WKG Division	202008	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	357,106.90
050 Mid-States Division	009 - WKG Division	202008	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	136,699.01
050 Mid-States Division	009 - WKG Division	202008	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(10,204.46)
050 Mid-States Division	009 - WKG Division	202008	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	121,725.74
050 Mid-States Division	009 - WKG Division	202008	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	174,550.11
050 Mid-States Division	009 - WKG Division	202008	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	1,242.22
050 Mid-States Division	009 - WKG Division	202008	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	488,242.40
050 Mid-States Division	009 - WKG Division	202008	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(23,620.65)
050 Mid-States Division	009 - WKG Division	202008	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	15.56
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	549.61
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	7,301.92
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	3,796.22
050 Mid-States Division	009 - WKG Division	202008	Retirement	37800	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	(802.99)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37601	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	(12,851.29)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37602	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	(6,127.35)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37800	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	(171.77)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37601	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	(47,057.40)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37800	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	(328.96)
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	989,228.32
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	1,062,677.53
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	185,835.34
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.51876	PRP.2738.W High St Lebanon	System Integrity	2609-KY PRP-Mains	39,312.16
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	3,190.87
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	453,602.13
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(591,726.92)
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	143,622.56
050 Mid-States Division	009 - WKG Division	202008	Retirement	37800	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(74.26)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(0.03)

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202008	Retirement	37601	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(23,665.44)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37800	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(4,136.57)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37601	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(15,193.33)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(7,970.73)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37800	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(248.66)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37601	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(971.00)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(106.72)
050 Mid-States Division	009 - WKG Division	202008	Retirement	37601	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(2,736.53)
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	815,743.36
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	724,890.08
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	449,781.41
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	10,481.54
050 Mid-States Division	009 - WKG Division	202008	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	485,812.31
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(476,539.86)
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	627,668.68
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	38,518.84
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	7.39
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(30,256.62)
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(45.63)
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(91,658.03)
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	9,385.94
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	195,808.87
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(27,273.65)
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	5.72
050 Mid-States Division	009 - WKG Division	202009	Addition	38300	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	7,970.33
050 Mid-States Division	009 - WKG Division	202009	Addition	38100	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	143,378.98
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	452,677.41
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	182,314.22
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(406,519.80)
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	2.00
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(25,820.52)
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(527,130.59)
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	1,171,389.22
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	4,726.85
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	254,512.88
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(234,270.44)
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	8,190.84
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	74,095.35
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	4,808.47
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	307,171.98
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(158,773.25)
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(6,909.97)
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(41,584.92)
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(401,684.41)
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	618,133.22
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	14,080.96
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(19,237.33)
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	6.12
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	37,692.34
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	6,444.37
050 Mid-States Division	009 - WKG Division	202009	Addition	38300	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	13,796.46
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(789,060.11)
050 Mid-States Division	009 - WKG Division	202009	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	1,141,048.99
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	34.10
050 Mid-States Division	009 - WKG Division	202009	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(47,551.07)
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	(29.05)
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.50939	PRP.2637.N 26th Street	System Integrity	2609-KY PRP-Mains	(2.19)
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	(2.65)
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51841	PRP.2637.Ohio St	System Integrity	2609-KY PRP-Mains	(3.24)
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	(1,013,172.45)
050 Mid-States Division	009 - WKG Division	202009	Addition	37800	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	105.14
050 Mid-States Division	009 - WKG Division	202009	Addition	37601	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	420.64
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	759,679.09
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	105.14
050 Mid-States Division	009 - WKG Division	202009	Addition	37800	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	10,516.04
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	280,778.38
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	239,138.68
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	1,151,446.06
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	70,745.04
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	83,569.53
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51876	PRP.2738.W High St Lebanon	System Integrity	2609-KY PRP-Mains	26,993.14

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	574,936.26
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51912	PRP.2734.E Cedar St Franklin	System Integrity	2609-KY PRP-Mains	(574,971.05)
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	1,246.16
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	394.57
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	185,630.48
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	1,200,342.05
050 Mid-States Division	009 - WKG Division	202009	Retirement	37601	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	(33,179.74)
050 Mid-States Division	009 - WKG Division	202009	Retirement	37601	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	1.30
050 Mid-States Division	009 - WKG Division	202009	Retirement	37601	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	(24,626.69)
050 Mid-States Division	009 - WKG Division	202009	Retirement	37601	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	(32,328.67)
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	891,770.98
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	63,230.89
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	53,971.69
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	7,376.93
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	276,145.15
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	(282,653.88)
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	105,151.13
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	468,567.75
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	223,405.94
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.54514	PRP.2635.Nichols St Princeton	System Integrity	2609-KY PRP-Mains	333,494.59
050 Mid-States Division	009 - WKG Division	202009	Retirement	37601	050.54514	PRP.2635.Nichols St Princeton	System Integrity	2609-KY PRP-Mains	(7,387.35)
050 Mid-States Division	009 - WKG Division	202009	Retirement	37601	050.54514	PRP.2635.Nichols St Princeton	System Integrity	2609-KY PRP-Mains	(2,426.86)
050 Mid-States Division	009 - WKG Division	202009	Retirement	37602	050.54514	PRP.2635.Nichols St Princeton	System Integrity	2609-KY PRP-Mains	(105.89)
050 Mid-States Division	009 - WKG Division	202009	Addition	37602	050.54687	PRP.2636.KY 1473 Greenville	System Integrity	2609-KY PRP-Mains	382,799.96
050 Mid-States Division	009 - WKG Division	202010	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	95,743.97
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(2,651.00)
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	145.77
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(53,445.48)
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	5.56
050 Mid-States Division	009 - WKG Division	202010	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	37,278.51
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	8.58
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(21,747.54)
050 Mid-States Division	009 - WKG Division	202010	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	122,304.92
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	5.00
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(115.63)
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(131,696.99)
050 Mid-States Division	009 - WKG Division	202010	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	244,289.42
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(16,567.05)
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	2.24
050 Mid-States Division	009 - WKG Division	202010	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	25,602.47
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(0.03)
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(3,071.36)
050 Mid-States Division	009 - WKG Division	202010	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	85,203.34
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(29,035.22)
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(0.76)
050 Mid-States Division	009 - WKG Division	202010	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	11,886.20
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(35,630.47)
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	94.46
050 Mid-States Division	009 - WKG Division	202010	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(81.67)
050 Mid-States Division	009 - WKG Division	202010	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	506.90
050 Mid-States Division	009 - WKG Division	202010	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	26,264.31
050 Mid-States Division	009 - WKG Division	202010	Addition	37800	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	0.01
050 Mid-States Division	009 - WKG Division	202010	Addition	37800	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	1.48
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	106.63
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	0.01
050 Mid-States Division	009 - WKG Division	202010	Addition	37601	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	0.06
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51843	PRP.2737.Hwy 150	System Integrity	2609-KY PRP-Mains	39.41
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	4,481.59
050 Mid-States Division	009 - WKG Division	202010	Retirement	37601	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	(277.72)
050 Mid-States Division	009 - WKG Division	202010	Retirement	37601	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	(30,364.13)
050 Mid-States Division	009 - WKG Division	202010	Retirement	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	(7,134.23)
050 Mid-States Division	009 - WKG Division	202010	Retirement	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	(19,024.76)
050 Mid-States Division	009 - WKG Division	202010	Retirement	37601	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	(1,448.32)
050 Mid-States Division	009 - WKG Division	202010	Retirement	37601	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	(10,477.65)
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	1,757.61
050 Mid-States Division	009 - WKG Division	202010	Retirement	37601	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	(664.91)
050 Mid-States Division	009 - WKG Division	202010	Retirement	37601	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	(318.68)
050 Mid-States Division	009 - WKG Division	202010	Retirement	37601	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	(28,978.22)
050 Mid-States Division	009 - WKG Division	202010	Retirement	37601	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	(11,144.37)
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	2,113.19
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	91.33

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51876	PRP.2738.W High St Lebanon	System Integrity	2609-KY PRP-Mains	(161.14)
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(14.70)
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(4.65)
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	10,741.26
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	22,452.24
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	689.69
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	2,625.36
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	4,463.87
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	7,647.73
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	204.30
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	14,834.10
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	131,593.78
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	10,526.27
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.54514	PRP.2635.Nichols St Princeton	System Integrity	2609-KY PRP-Mains	(1,353.01)
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.54687	PRP.2636.KY 1473 Greenville	System Integrity	2609-KY PRP-Mains	(236.86)
050 Mid-States Division	009 - WKG Division	202010	Addition	37602	050.54816	PRP.2635. S Mcnary St	System Integrity	2609-KY PRP-Mains	380,638.23
050 Mid-States Division	009 - WKG Division	202011	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	119,191.36
050 Mid-States Division	009 - WKG Division	202011	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	5.56
050 Mid-States Division	009 - WKG Division	202011	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(2,128.66)
050 Mid-States Division	009 - WKG Division	202011	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	1.73
050 Mid-States Division	009 - WKG Division	202011	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(9,051.83)
050 Mid-States Division	009 - WKG Division	202011	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	80,386.52
050 Mid-States Division	009 - WKG Division	202011	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	23,482.57
050 Mid-States Division	009 - WKG Division	202011	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	1.00
050 Mid-States Division	009 - WKG Division	202011	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(9,638.44)
050 Mid-States Division	009 - WKG Division	202011	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	92,754.97
050 Mid-States Division	009 - WKG Division	202011	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(7,835.05)
050 Mid-States Division	009 - WKG Division	202011	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	447.03
050 Mid-States Division	009 - WKG Division	202011	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	13,337.71
050 Mid-States Division	009 - WKG Division	202011	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	12,996.69
050 Mid-States Division	009 - WKG Division	202011	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(14,808.97)
050 Mid-States Division	009 - WKG Division	202011	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	6.05
050 Mid-States Division	009 - WKG Division	202011	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	2,725.57
050 Mid-States Division	009 - WKG Division	202011	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	13,663.69
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	36,956.79
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	(1,232,848.59)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	1,194,936.30
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	(1,153,203.67)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	691,714.27
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	253,628.56
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	207,514.28
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	(1,135,535.76)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	623,985.15
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	510,626.16
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	113.47
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	(9,275.82)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	(11,840.86)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	0.09
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	(137,039.08)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51876	PRP.2738.W High St Lebanon	System Integrity	2609-KY PRP-Mains	(78.82)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(25.90)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	(8.20)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	(1,429.77)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	(37,684.63)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	(4,803.75)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	(18,202.59)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	(5,886.15)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	(1,222,794.29)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	244,420.79
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	977,683.19
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	(540.88)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	1,581.29
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	14,231.46
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	(790,746.33)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	774,823.94
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	(9,292.44)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	(18,036.71)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	0.40
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	(1,871.93)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	355,090.58
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	(508,216.97)

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	152,181.67
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	(7,113.40)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	(4,463.73)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	(1,367.01)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	(533.12)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	2,379.19
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	4,533.92
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	23.85
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	(233,932.21)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	238,138.14
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	190.68
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	(57,487.81)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	2.37
050 Mid-States Division	009 - WKG Division	202011	Retirement	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	(580.80)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	(502.98)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	0.03
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.54514	PRP.2635.Nichols St Princeton	System Integrity	2609-KY PRP-Mains	(332,141.58)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.54514	PRP.2635.Nichols St Princeton	System Integrity	2609-KY PRP-Mains	331,815.05
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.54687	PRP.2636.KY 1473 Greenville	System Integrity	2609-KY PRP-Mains	(345.20)
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	161,714.16
050 Mid-States Division	009 - WKG Division	202011	Addition	37602	050.54816	PRP.2635. S Mcnary St	System Integrity	2609-KY PRP-Mains	2,047.50
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.54816	PRP.2635. S Mcnary St	System Integrity	2609-KY PRP-Mains	(6,869.08)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37602	050.54816	PRP.2635. S Mcnary St	System Integrity	2609-KY PRP-Mains	(248.20)
050 Mid-States Division	009 - WKG Division	202011	Retirement	37601	050.54816	PRP.2635. S Mcnary St	System Integrity	2609-KY PRP-Mains	(3,759.17)
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(214,935.33)
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	388,081.29
050 Mid-States Division	009 - WKG Division	202012	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	35.06
050 Mid-States Division	009 - WKG Division	202012	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(86,001.24)
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	5,675.51
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	361,234.06
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(117,665.03)
050 Mid-States Division	009 - WKG Division	202012	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(11,259.77)
050 Mid-States Division	009 - WKG Division	202012	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	2.86
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(145,787.49)
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	3,599.73
050 Mid-States Division	009 - WKG Division	202012	Addition	38300	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	1,841.01
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	193,307.22
050 Mid-States Division	009 - WKG Division	202012	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(140,909.44)
050 Mid-States Division	009 - WKG Division	202012	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	45.03
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	481,487.06
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(337,044.39)
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	27,251.35
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(26,049.50)
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	209,305.03
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(98,541.05)
050 Mid-States Division	009 - WKG Division	202012	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(1.52)
050 Mid-States Division	009 - WKG Division	202012	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(104,682.58)
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(24,882.89)
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	58,954.30
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	836.43
050 Mid-States Division	009 - WKG Division	202012	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	21,206.17
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	406.45
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	12.57
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	33.10
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	90.27
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	27.07
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	0.03
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	103.54
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	126.49
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	130,173.53
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	(1,301,735.20)
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	1,171,561.66
050 Mid-States Division	009 - WKG Division	202012	Retirement	37601	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	(18,947.73)
050 Mid-States Division	009 - WKG Division	202012	Retirement	37601	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	(13,752.73)
050 Mid-States Division	009 - WKG Division	202012	Retirement	37602	050.51868	PRP.2738.W. Walnut St Lebanon	System Integrity	2609-KY PRP-Mains	(59.82)
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51876	PRP.2738.W High St Lebanon	System Integrity	2609-KY PRP-Mains	131,294.57
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51876	PRP.2738.W High St Lebanon	System Integrity	2609-KY PRP-Mains	(1,193,596.14)
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51876	PRP.2738.W High St Lebanon	System Integrity	2609-KY PRP-Mains	1,062,292.53
050 Mid-States Division	009 - WKG Division	202012	Retirement	37601	050.51876	PRP.2738.W High St Lebanon	System Integrity	2609-KY PRP-Mains	(25,791.84)
050 Mid-States Division	009 - WKG Division	202012	Retirement	37601	050.51876	PRP.2738.W High St Lebanon	System Integrity	2609-KY PRP-Mains	(18,180.88)
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	6.37

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51913	PRP.2636.Allen Street	System Integrity	2609-KY PRP-Mains	2.01
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	11,856.89
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	7,975.60
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	31,902.35
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	112.41
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	0.37
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	3.39
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	184.00
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	92.08
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	214.82
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	175.43
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.53251	PRP.2734.Hwy 383 Franklin	System Integrity	2609-KY PRP-Mains	4.69
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	2,060.47
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	3,331.11
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	0.05
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	584.75
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	0.48
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54514	PRP.2635.Nichols St Princeton	System Integrity	2609-KY PRP-Mains	(61.08)
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	143,671.87
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54687	PRP.2636.KY 1473 Greenville	System Integrity	2609-KY PRP-Mains	382,239.56
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54687	PRP.2636.KY 1473 Greenville	System Integrity	2609-KY PRP-Mains	(382,217.90)
050 Mid-States Division	009 - WKG Division	202012	Retirement	37601	050.54687	PRP.2636.KY 1473 Greenville	System Integrity	2609-KY PRP-Mains	(67,323.57)
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54723	PRP.2737.W Broadway	System Integrity	2609-KY PRP-Mains	119,222.10
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	4,932.07
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	485,923.28
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54811	PRP.2734.Pearl-Boat Lndg	System Integrity	2609-KY PRP-Mains	143,437.86
050 Mid-States Division	009 - WKG Division	202012	Retirement	37601	050.54811	PRP.2734.Pearl-Boat Lndg	System Integrity	2609-KY PRP-Mains	(4,879.44)
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54816	PRP.2635. S McNary St	System Integrity	2609-KY PRP-Mains	384,546.14
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.54816	PRP.2635. S McNary St	System Integrity	2609-KY PRP-Mains	(382,685.73)
050 Mid-States Division	009 - WKG Division	202012	Addition	37602	050.55331	PRP.2636.Guenther Alley	System Integrity	2609-KY PRP-Mains	6,131.08
050 Mid-States Division	009 - WKG Division	202101	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	282,097.70
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	31.41
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(41,454.40)
050 Mid-States Division	009 - WKG Division	202101	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	111,561.52
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(14,698.26)
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	45.73
050 Mid-States Division	009 - WKG Division	202101	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	18,823.72
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(1,040.67)
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(12,422.06)
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	1.00
050 Mid-States Division	009 - WKG Division	202101	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	224,530.78
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(4,503.64)
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	2.24
050 Mid-States Division	009 - WKG Division	202101	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	459.23
050 Mid-States Division	009 - WKG Division	202101	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	45,556.03
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	44.54
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(40,125.19)
050 Mid-States Division	009 - WKG Division	202101	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	107,177.36
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(384.54)
050 Mid-States Division	009 - WKG Division	202101	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	549.65
050 Mid-States Division	009 - WKG Division	202101	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	25,787.13
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(137,152.74)
050 Mid-States Division	009 - WKG Division	202101	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	0.78
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	4.02
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.51844	PRP.2734.E 9th Russellville	System Integrity	2609-KY PRP-Mains	129.75
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	10.60
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	8.66
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.51857	PRP.2738.McCord St	System Integrity	2609-KY PRP-Mains	28.88
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	47.17
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	38.61
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	1,140.88
050 Mid-States Division	009 - WKG Division	202101	Retirement	37602	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	(8,969.68)
050 Mid-States Division	009 - WKG Division	202101	Retirement	37602	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	2.60
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	62.05
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.52351	PRP.2637.S 28th St	System Integrity	2609-KY PRP-Mains	15.51
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	46.71
050 Mid-States Division	009 - WKG Division	202101	Retirement	37601	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	(8,546.44)
050 Mid-States Division	009 - WKG Division	202101	Retirement	37601	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	(4,890.38)
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	103.64
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	5,642.00
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	11.51

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	29.54
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.53086	PRP.2634.Grapevine Rd.	System Integrity	2609-KY PRP-Mains	68.93
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	(18.45)
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	8,168.15
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	92.88
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54248	PRP.2637.Bridge St Phase 1	System Integrity	2609-KY PRP-Mains	0.07
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	19,938.01
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54687	PRP.2636.KY 1473 Greenville	System Integrity	2609-KY PRP-Mains	20.09
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	311,061.71
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54723	PRP.2737.W Broadway	System Integrity	2609-KY PRP-Mains	16,099.31
050 Mid-States Division	009 - WKG Division	202101	Retirement	37601	050.54723	PRP.2737.W Broadway	System Integrity	2609-KY PRP-Mains	(3,445.72)
050 Mid-States Division	009 - WKG Division	202101	Retirement	37601	050.54723	PRP.2737.W Broadway	System Integrity	2609-KY PRP-Mains	(11,058.31)
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	66,685.32
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(166,646.23)
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	8,335.68
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	91,692.33
050 Mid-States Division	009 - WKG Division	202101	Retirement	37601	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(556.78)
050 Mid-States Division	009 - WKG Division	202101	Retirement	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(720.92)
050 Mid-States Division	009 - WKG Division	202101	Retirement	37601	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(7,385.97)
050 Mid-States Division	009 - WKG Division	202101	Retirement	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(653.34)
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	45,780.05
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54811	PRP.2734.Pearl-Boat Lndg	System Integrity	2609-KY PRP-Mains	143,499.44
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54811	PRP.2734.Pearl-Boat Lndg	System Integrity	2609-KY PRP-Mains	(143,437.86)
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.54816	PRP.2635. S Mcnary St	System Integrity	2609-KY PRP-Mains	317.87
050 Mid-States Division	009 - WKG Division	202101	Addition	37602	050.55331	PRP.2636.Guenther Alley	System Integrity	2609-KY PRP-Mains	233.00
050 Mid-States Division	009 - WKG Division	202102	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	137,406.36
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(11.80)
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(30,149.32)
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	51.11
050 Mid-States Division	009 - WKG Division	202102	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	43,191.78
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(10,941.49)
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	31.20
050 Mid-States Division	009 - WKG Division	202102	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	39,258.86
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(121,151.17)
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(462.52)
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	138.45
050 Mid-States Division	009 - WKG Division	202102	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	70,281.83
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(88,351.93)
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	89.29
050 Mid-States Division	009 - WKG Division	202102	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	490.98
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	148.64
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(25,950.20)
050 Mid-States Division	009 - WKG Division	202102	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	33,986.45
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(2,936.42)
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	22.27
050 Mid-States Division	009 - WKG Division	202102	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	105,189.17
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(10,199.28)
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	62.74
050 Mid-States Division	009 - WKG Division	202102	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	626.33
050 Mid-States Division	009 - WKG Division	202102	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	21,558.55
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(10.48)
050 Mid-States Division	009 - WKG Division	202102	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(5,865.07)
050 Mid-States Division	009 - WKG Division	202102	Retirement	37602	050.51867	PRP.2734.Jackson - Pearl St	System Integrity	2609-KY PRP-Mains	(553.12)
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	18,306.42
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	(610,218.75)
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	591,908.06
050 Mid-States Division	009 - WKG Division	202102	Retirement	37601	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	5.85
050 Mid-States Division	009 - WKG Division	202102	Retirement	37601	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	(19,727.28)
050 Mid-States Division	009 - WKG Division	202102	Retirement	37601	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	(124,538.14)
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	517,603.57
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	(616,194.71)
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	98,591.14
050 Mid-States Division	009 - WKG Division	202102	Retirement	37601	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	(4,882.01)
050 Mid-States Division	009 - WKG Division	202102	Retirement	37601	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	(13,641.38)
050 Mid-States Division	009 - WKG Division	202102	Retirement	37601	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	(9,777.27)
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	107,579.08
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	4,380.35
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54723	PRP.2737.W Broadway	System Integrity	2609-KY PRP-Mains	735.83
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(5.80)
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(0.73)
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(7.95)

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	30,380.89
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.54811	PRP.2734.Pearl-Boat Lndg	System Integrity	2609-KY PRP-Mains	(12.87)
050 Mid-States Division	009 - WKG Division	202102	Retirement	37602	050.54811	PRP.2734.Pearl-Boat Lndg	System Integrity	2609-KY PRP-Mains	(2,609.86)
050 Mid-States Division	009 - WKG Division	202102	Retirement	37602	050.54811	PRP.2734.Pearl-Boat Lndg	System Integrity	2609-KY PRP-Mains	0.63
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.55331	PRP.2636.Guenther Alley	System Integrity	2609-KY PRP-Mains	6,286.28
050 Mid-States Division	009 - WKG Division	202102	Addition	37602	050.55331	PRP.2636.Guenther Alley	System Integrity	2609-KY PRP-Mains	(6,364.08)
050 Mid-States Division	009 - WKG Division	202102	Retirement	37601	050.55331	PRP.2636.Guenther Alley	System Integrity	2609-KY PRP-Mains	(1,248.95)
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	706,609.53
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(419,504.06)
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	14,641.77
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	328,881.59
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(154,753.30)
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(58,082.58)
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	549.80
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	121,681.31
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	421,935.37
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(294,812.61)
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(950.21)
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	1,340.72
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(79,542.48)
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	196,985.80
050 Mid-States Division	009 - WKG Division	202103	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(7,407.88)
050 Mid-States Division	009 - WKG Division	202103	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	22.27
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(212,366.53)
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	285,487.76
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	625.14
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	66,429.09
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	7,890.48
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(108,479.85)
050 Mid-States Division	009 - WKG Division	202103	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	55,256.32
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.51957	PRP.2735.Lexington Ave	System Integrity	2609-KY PRP-Mains	(16.43)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	(1.81)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	(98.37)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.52895	PRP.2636.Crabtree Ave	System Integrity	2609-KY PRP-Mains	(0.20)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	(0.11)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.53707	PRP.2637.Old Mayfield Rd	System Integrity	2609-KY PRP-Mains	(3.37)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	(22.23)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.54130	PRP.2636.Poplar St Alley	System Integrity	2609-KY PRP-Mains	(116.70)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	67,894.79
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	2,763.96
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.54723	PRP.2737.W Broadway	System Integrity	2609-KY PRP-Mains	1,894.04
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(0.59)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(4.78)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.54744	PRP.2636.25th - Clay	System Integrity	2609-KY PRP-Mains	(6.60)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	12,020.36
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.54811	PRP.2734.Pearl-Boat Lndg	System Integrity	2609-KY PRP-Mains	(10.61)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.55331	PRP.2636.Guenther Alley	System Integrity	2609-KY PRP-Mains	(64.13)
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.55561	PRP.2637.Broad St	System Integrity	2609-KY PRP-Mains	482,008.06
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.55693	PRP.2734.US 31W - Emmett Ave	System Integrity	2609-KY PRP-Mains	97,868.29
050 Mid-States Division	009 - WKG Division	202103	Retirement	37602	050.55693	PRP.2734.US 31W - Emmett Ave	System Integrity	2609-KY PRP-Mains	(3,763.50)
050 Mid-States Division	009 - WKG Division	202103	Retirement	37601	050.55693	PRP.2734.US 31W - Emmett Ave	System Integrity	2609-KY PRP-Mains	(1,785.10)
050 Mid-States Division	009 - WKG Division	202103	Retirement	37602	050.55693	PRP.2734.US 31W - Emmett Ave	System Integrity	2609-KY PRP-Mains	0.10
050 Mid-States Division	009 - WKG Division	202103	Addition	37602	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	135,310.28
050 Mid-States Division	009 - WKG Division	202104	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	178,844.40
050 Mid-States Division	009 - WKG Division	202104	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(76,843.15)
050 Mid-States Division	009 - WKG Division	202104	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	219.91
050 Mid-States Division	009 - WKG Division	202104	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	50,192.40
050 Mid-States Division	009 - WKG Division	202104	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(13,928.66)
050 Mid-States Division	009 - WKG Division	202104	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	5.62
050 Mid-States Division	009 - WKG Division	202104	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	36,751.15
050 Mid-States Division	009 - WKG Division	202104	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(15,015.72)
050 Mid-States Division	009 - WKG Division	202104	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	48.00
050 Mid-States Division	009 - WKG Division	202104	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	178,484.18
050 Mid-States Division	009 - WKG Division	202104	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(99.99)
050 Mid-States Division	009 - WKG Division	202104	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	153,109.19
050 Mid-States Division	009 - WKG Division	202104	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(32,037.22)
050 Mid-States Division	009 - WKG Division	202104	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	60.37
050 Mid-States Division	009 - WKG Division	202104	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	135,150.99
050 Mid-States Division	009 - WKG Division	202104	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(13,232.06)
050 Mid-States Division	009 - WKG Division	202104	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(32.92)
050 Mid-States Division	009 - WKG Division	202104	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(123.55)



Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202104	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	77,165.64
050 Mid-States Division	009 - WKG Division	202104	Addition	37602	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	(378.50)
050 Mid-States Division	009 - WKG Division	202104	Addition	37602	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	25,982.97
050 Mid-States Division	009 - WKG Division	202104	Retirement	37602	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	1.81
050 Mid-States Division	009 - WKG Division	202104	Retirement	37601	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	(14,632.20)
050 Mid-States Division	009 - WKG Division	202104	Retirement	37601	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	(1,007.47)
050 Mid-States Division	009 - WKG Division	202104	Retirement	37602	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	(5,972.69)
050 Mid-States Division	009 - WKG Division	202104	Addition	37601	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	8,420.64
050 Mid-States Division	009 - WKG Division	202104	Addition	37602	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	357,997.89
050 Mid-States Division	009 - WKG Division	202104	Addition	37602	050.54723	PRP.2737.W Broadway	System Integrity	2609-KY PRP-Mains	(288.82)
050 Mid-States Division	009 - WKG Division	202104	Addition	37602	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	36,138.09
050 Mid-States Division	009 - WKG Division	202104	Addition	37602	050.55561	PRP.2637.Broad St	System Integrity	2609-KY PRP-Mains	15,802.50
050 Mid-States Division	009 - WKG Division	202104	Addition	37602	050.55693	PRP.2734.US 31W - Emmett Ave	System Integrity	2609-KY PRP-Mains	(205.21)
050 Mid-States Division	009 - WKG Division	202104	Addition	37602	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	123,084.15
050 Mid-States Division	009 - WKG Division	202105	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	223,280.64
050 Mid-States Division	009 - WKG Division	202105	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(140.06)
050 Mid-States Division	009 - WKG Division	202105	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	166.16
050 Mid-States Division	009 - WKG Division	202105	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(23,741.18)
050 Mid-States Division	009 - WKG Division	202105	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	76,934.20
050 Mid-States Division	009 - WKG Division	202105	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	55,228.11
050 Mid-States Division	009 - WKG Division	202105	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	72,141.64
050 Mid-States Division	009 - WKG Division	202105	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	46.38
050 Mid-States Division	009 - WKG Division	202105	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(40,372.27)
050 Mid-States Division	009 - WKG Division	202105	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	1,508.10
050 Mid-States Division	009 - WKG Division	202105	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	211,826.46
050 Mid-States Division	009 - WKG Division	202105	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(138,834.67)
050 Mid-States Division	009 - WKG Division	202105	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	258.06
050 Mid-States Division	009 - WKG Division	202105	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	45,140.34
050 Mid-States Division	009 - WKG Division	202105	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	176.28
050 Mid-States Division	009 - WKG Division	202105	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(42,504.18)
050 Mid-States Division	009 - WKG Division	202105	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	215.94
050 Mid-States Division	009 - WKG Division	202105	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	25,226.61
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.54625	PRP.2737.Danville Ave	System Integrity	2609-KY PRP-Mains	751,722.75
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	(141.55)
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	(344,188.99)
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	343,703.75
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	14,922.63
050 Mid-States Division	009 - WKG Division	202105	Addition	37601	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	351.01
050 Mid-States Division	009 - WKG Division	202105	Retirement	37601	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(14,115.49)
050 Mid-States Division	009 - WKG Division	202105	Retirement	37800	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(32.03)
050 Mid-States Division	009 - WKG Division	202105	Retirement	37800	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(270.94)
050 Mid-States Division	009 - WKG Division	202105	Retirement	37800	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(39.99)
050 Mid-States Division	009 - WKG Division	202105	Retirement	37601	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	2.29
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.54723	PRP.2737.W Broadway	System Integrity	2609-KY PRP-Mains	3,783.88
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	(319.82)
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	843,594.18
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.55413	PRP.2635.W Main St	System Integrity	2609-KY PRP-Mains	756,146.53
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.55561	PRP.2637.Broad St	System Integrity	2609-KY PRP-Mains	17,697.40
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.55667	PRP.2737.Ledford Lane	System Integrity	2609-KY PRP-Mains	349,195.05
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.55693	PRP.2734.US 31W - Emmett Ave	System Integrity	2609-KY PRP-Mains	(97,668.08)
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.55693	PRP.2734.US 31W - Emmett Ave	System Integrity	2609-KY PRP-Mains	97,596.45
050 Mid-States Division	009 - WKG Division	202105	Addition	37602	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	(45,982.95)
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	25,122.81
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(402,125.04)
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	622,363.48
050 Mid-States Division	009 - WKG Division	202106	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(16,747.37)
050 Mid-States Division	009 - WKG Division	202106	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	133.69
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(127,126.60)
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	252,553.95
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	5,961.73
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(91,979.26)
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	159,211.76
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(250,625.82)
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	402,502.37
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	6,268.63
050 Mid-States Division	009 - WKG Division	202106	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(33,350.74)
050 Mid-States Division	009 - WKG Division	202106	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(2,529.58)
050 Mid-States Division	009 - WKG Division	202106	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	26.97
050 Mid-States Division	009 - WKG Division	202106	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(1.41)
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(89.45)
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(364,935.65)

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	586,299.79
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	4,862.80
050 Mid-States Division	009 - WKG Division	202106	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(77,733.35)
050 Mid-States Division	009 - WKG Division	202106	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	313.26
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(180,291.33)
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	4,542.68
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	315,373.75
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.26306	HopkinsvillePRPServices	System Integrity	2610-KY PRP-Services	(17.09)
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	129,007.94
050 Mid-States Division	009 - WKG Division	202106	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(102,392.25)
050 Mid-States Division	009 - WKG Division	202106	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(10.81)
050 Mid-States Division	009 - WKG Division	202106	Retirement	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	(29,371.28)
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	446,039.47
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	8,920.79
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	(892,078.91)
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.52522	PRP.2737. Ky 52 - Danville St	System Integrity	2609-KY PRP-Mains	437,118.65
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54625	PRP.2737.Danville Ave	System Integrity	2609-KY PRP-Mains	5,000.90
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	341,501.55
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	(338,563.70)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37601	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	(508.82)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37601	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	(4,958.24)
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54689	PRP.2735.Hiseville	System Integrity	2609-KY PRP-Mains	(226.91)
050 Mid-States Division	009 - WKG Division	202106	Addition	37800	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	3,968.36
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(372,920.52)
050 Mid-States Division	009 - WKG Division	202106	Addition	37601	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	43,652.07
050 Mid-States Division	009 - WKG Division	202106	Addition	37800	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	19,841.85
050 Mid-States Division	009 - WKG Division	202106	Addition	37601	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(8,771.65)
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	325,406.47
050 Mid-States Division	009 - WKG Division	202106	Addition	37800	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	3,968.36
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54694	PRP.2735.Grandview Dr	System Integrity	2609-KY PRP-Mains	655,604.18
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54723	PRP.2737.W Broadway	System Integrity	2609-KY PRP-Mains	141,370.55
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54723	PRP.2737.W Broadway	System Integrity	2609-KY PRP-Mains	(141,446.34)
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54742	PRP.2738.Perryville Rd	System Integrity	2609-KY PRP-Mains	1,079,510.64
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	(168.39)
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	(1,138.43)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37601	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	0.06
050 Mid-States Division	009 - WKG Division	202106	Retirement	37601	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	(9,054.52)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37601	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	(5,844.59)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37602	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	(2,639.51)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37601	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	(902.52)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37601	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	(102,027.86)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37602	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	1.96
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.54809	PRP.2734.E 3rd St Russellvill	System Integrity	2609-KY PRP-Mains	867,005.05
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.55413	PRP.2635.W Main St	System Integrity	2609-KY PRP-Mains	49,355.81
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.55561	PRP.2637.Broad St	System Integrity	2609-KY PRP-Mains	2,492.30
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.55667	PRP.2737.Ledford Lane	System Integrity	2609-KY PRP-Mains	3,838.78
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.55693	PRP.2734.US 31W - Emmett Ave	System Integrity	2609-KY PRP-Mains	(33.36)
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	(212,411.48)
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	2,927.36
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	1,112.21
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	234,056.16
050 Mid-States Division	009 - WKG Division	202106	Retirement	37601	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	(7,713.04)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37602	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	(230.36)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37602	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	(12,120.11)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37601	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	(151.14)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37602	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	(0.07)
050 Mid-States Division	009 - WKG Division	202106	Retirement	37601	050.55738	PRP.2636.25th St Ann	System Integrity	2609-KY PRP-Mains	(37.77)
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.55814	PRP.2637.Hill St	System Integrity	2609-KY PRP-Mains	470,738.56
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.56052	PRP.2636.14th St	System Integrity	2609-KY PRP-Mains	344,817.21
050 Mid-States Division	009 - WKG Division	202106	Addition	37602	050.56557	PRP.2635.KY 109	System Integrity	2609-KY PRP-Mains	20,252.78
050 Mid-States Division	009 - WKG Division	202107	Addition	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	191,375.01
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(73,359.22)
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	(115.63)
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.24084	BowlingGreenPRPServices	System Integrity	2610-KY PRP-Services	70.36
050 Mid-States Division	009 - WKG Division	202107	Addition	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	102,555.94
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	45.73
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(5,359.08)
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.24085	DanvillePRPServices	System Integrity	2610-KY PRP-Services	(105.90)
050 Mid-States Division	009 - WKG Division	202107	Addition	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	116,517.47
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	(20,462.01)
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.24086	OwensboroPRPServices	System Integrity	2610-KY PRP-Services	36.53

Company Name	Business Segment	Month Number	Ferc Activity Code	Utility Account	Project Number	Project Name	Budget Category	Activity Code Desc	Activity Cost
050 Mid-States Division	009 - WKG Division	202107	Addition	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	233,620.90
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	(18,542.90)
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.24087	PaducahPRPServices	System Integrity	2610-KY PRP-Services	10.21
050 Mid-States Division	009 - WKG Division	202107	Addition	38000	050.26288	MadisonvillePRPServices	System Integrity	2610-KY PRP-Services	(70.90)
050 Mid-States Division	009 - WKG Division	202107	Addition	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	188,993.06
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(72.11)
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.26295	PrincetonPRPServices	System Integrity	2610-KY PRP-Services	(154,086.12)
050 Mid-States Division	009 - WKG Division	202107	Addition	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	105,937.07
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	(33,316.09)
050 Mid-States Division	009 - WKG Division	202107	Retirement	38000	050.26303	GlasgowPRPServices	System Integrity	2610-KY PRP-Services	127.01
050 Mid-States Division	009 - WKG Division	202107	Addition	38000	050.26309	CampbellsvillePRPServices	System Integrity	2610-KY PRP-Services	37,437.42
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54625	PRP.2737.Danville Ave	System Integrity	2609-KY PRP-Mains	2,908.47
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54626	PRP.2737.Hill Ct Lancaster	System Integrity	2609-KY PRP-Mains	(874.19)
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(361.23)
050 Mid-States Division	009 - WKG Division	202107	Addition	37800	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(4.41)
050 Mid-States Division	009 - WKG Division	202107	Addition	37601	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(48.47)
050 Mid-States Division	009 - WKG Division	202107	Addition	37800	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(4.41)
050 Mid-States Division	009 - WKG Division	202107	Addition	37800	050.54690	PRP.2735.Rowletts	System Integrity	2609-KY PRP-Mains	(22.03)
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54694	PRP.2735.Grandview Dr	System Integrity	2609-KY PRP-Mains	9,548.48
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54742	PRP.2738.Perryville Rd	System Integrity	2609-KY PRP-Mains	31,553.07
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54743	PRP.2635.Princeton North	System Integrity	2609-KY PRP-Mains	1,422,730.69
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	60,975.45
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	(609,754.46)
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	548,779.01
050 Mid-States Division	009 - WKG Division	202107	Retirement	37601	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	(80,737.20)
050 Mid-States Division	009 - WKG Division	202107	Retirement	37601	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	3.81
050 Mid-States Division	009 - WKG Division	202107	Retirement	37601	050.54761	PRP.2637.Bridge St Phase 2	System Integrity	2609-KY PRP-Mains	(17,846.15)
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	88,697.24
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	399,137.64
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	399,137.62
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54762	PRP.2734.4th St	System Integrity	2609-KY PRP-Mains	(842,455.75)
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.54809	PRP.2734.E 3rd St Russellvill	System Integrity	2609-KY PRP-Mains	70,918.61
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.55413	PRP.2635.W Main St	System Integrity	2609-KY PRP-Mains	53,920.88
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.55561	PRP.2637.Broad St	System Integrity	2609-KY PRP-Mains	49,200.09
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.55667	PRP.2737.Ledford Lane	System Integrity	2609-KY PRP-Mains	5,781.49
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.55692	PRP.2734.High St Alley BG	System Integrity	2609-KY PRP-Mains	465,243.59
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.55814	PRP.2637.Hill St	System Integrity	2609-KY PRP-Mains	27,144.14
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.56052	PRP.2636.14th St	System Integrity	2609-KY PRP-Mains	53,257.78
050 Mid-States Division	009 - WKG Division	202107	Addition	37602	050.56557	PRP.2635.KY 109	System Integrity	2609-KY PRP-Mains	14,562.13

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-26**  
**Page 1 of 1**

**REQUEST:**

Refer to the Direct Testimony of Mr. Christian at 45. Describe the Company's accounting for the depreciation expense regulatory liability and provide all related journal entries for one month to illustrate the accounting.

**RESPONSE:**

The journal entry made each month to Kentucky Division 009 is shown below:

Credit Account 2540-27913 for \$306,398.67  
Debit Account 4030-30005 for \$306,398.67

As stated on page 45 of the direct testimony of Joe Christian, the accumulated thirty-two month amount recorded to the regulatory liability would be \$9,804,757.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-27**  
**Page 1 of 1**

**REQUEST:**

Refer to the Direct Testimony of Mr. Christian at 45 and to Schedule A lines 12 and 13 in regard to the proposal to return to ratepayers the \$9,862,441 million of depreciation expense regulatory liability over twelve months. Confirm that it is the Company's proposal to increase base rates by \$16,389,804 million in the first year, then temporarily reduce base rates by \$9,862,441 million to refund the regulatory liability, so that the full rate increase of \$16,389,804 will be in effect in the second year and thereafter? If this is not correct, then provide a corrected statement and explanation.

**RESPONSE:**

Confirm, the Company will reduce rates to customers for a one year period under the Company's proposal to return the depreciation regulatory liability.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-28**  
**Page 1 of 1**

**REQUEST:**

Provide a schedule of the amortization expense and remaining balance associated with each regulatory asset and each regulatory liability for each month for the years 2018 through 2020, for each actual month during 2021, and for each month projected for the remainder of 2021 and continuing through the end of the test year. In addition, provide the amortization period and the Case No. in which the Commission approved the recovery and the amortization period, if any. If there was no regulatory asset and/or no regulatory liability amortization in the years prior to the test year and the amortization expense in the test year relates only to new deferrals for which recovery is requested in this case, so state.

**RESPONSE:**

For the Company's ADIT excess deferred liability amortization, please see Attachment 1. Amortization of this regulatory liability was approved in Case No. 2017-00349, with an amortization period of 24 years using the Reverse South Georgia Method. In this case, the Company is requesting that the amortization of the remaining unprotected balance be accelerated to a period of 5 years.

For the Company's amortization of the cost of service regulatory liability, please see Attachment 2. The Company was ordered to establish this regulatory liability in Case No. 2018-00039 issued April 22, 2020, with the liability to be refunded from May 2020 through August 2020. However, after the initial refunds, a balance of \$57,684 remains outstanding, and in the instant case the Company requests that the remaining balance be refunded over 12 months.

For the Company's amortization of the depreciation regulatory liability, please see Attachment 3. In Case No. 2018-00281, the Company was ordered to establish this regulatory liability without carrying charges with amortization of this liability to be addressed in the Company's next base rate case. In the instant case, the Company requests that this regulatory liability balance be amortized over 12 months.

For the Company's amortization of the rate case expense regulatory asset, please see Attachment 4. In Case No. 2018-00281, 2018 rate case expenses in the amount of \$189,861 were approved with a 3-year amortization period. In the instant case, the Company requests an amortization period of 3 years for the forecasted test year rate case expense.

**ATTACHMENTS:**

ATTACHMENT 1 - AG\_1-28\_Att1 - ADIT Excess Deferred Liabilities.xlsx, 5 Pages.

ATTACHMENT 2 - AG\_1-28\_Att2 - Reg Liability COS Reserve.xlsx, 1 Page.

ATTACHMENT 3 - AG\_1-28\_Att3 - Reg Liability Depreciation Reserve.xlsx, 1 Page.

ATTACHMENT 4 - AG\_1\_28\_Att4 - Rate Case Expense Reg Asset, 4 Pages.

Respondent: Joe Christian

Atmos Energy Corporation, Kentucky/Mid-States Division  
Kentucky Jurisdiction Case No. 2021-00214  
Base Period: Twelve Months Ended September 30, 2021  
Forecasted Test Period: Twelve Months Ended December 31, 2022  
Deferred Liability Amortization

ADIT Excess Deferred Liabilities  
Account 2530 - 27909

Forecasted Test Period

Test Period Ending Balance	Test Period 13- Month Balance	Test Period Amort. Expense
\$ (25,000,033)	\$ (27,703,403)	\$ 5,406,740

Full Amortization Schedule

	Balance			Amortization			
	Protected	Unprotected	Total Reg Liability	Protected	Unprotected	Unprotected	Total
<b>Beginning Regulatory Liability</b>	\$ (5,565,573)	\$ (30,215,187)	\$ (35,780,760)				
May-18	(5,544,491)	(30,113,666)	(35,658,157)	21,082	101,521		122,603
Jun-18	(5,523,409)	(30,012,145)	(35,535,555)	21,082	101,521		122,603
Jul-18	(5,502,327)	(29,910,624)	(35,412,952)	21,082	101,521		122,603
Aug-18	(5,481,246)	(29,809,103)	(35,290,349)	21,082	101,521		122,603
Sep-18	(5,460,164)	(29,707,582)	(35,167,746)	21,082	101,521		122,603
Oct-18	(5,439,082)	(29,606,061)	(35,045,143)	21,082	101,521		122,603
Nov-18	(5,418,001)	(29,504,540)	(34,922,541)	21,082	101,521		122,603
Dec-18	(5,396,919)	(29,403,019)	(34,799,938)	21,082	101,521		122,603
Jan-19	(5,375,837)	(29,301,498)	(34,677,335)	21,082	101,521		122,603
Feb-19	(5,354,755)	(29,199,977)	(34,554,732)	21,082	101,521		122,603
Mar-19	(5,333,674)	(29,098,456)	(34,432,130)	21,082	101,521		122,603
<b>First Change in Rates</b>	(5,312,592)	(28,997,557)	(34,310,149)	21,082	100,899		121,981
May-19	(5,291,510)	(28,896,658)	(34,188,169)	21,082	100,899		121,981
Jun-19	(5,270,429)	(28,795,760)	(34,066,188)	21,082	100,899		121,981
Jul-19	(5,249,347)	(28,694,861)	(33,944,208)	21,082	100,899		121,981
Aug-19	(5,228,265)	(28,593,962)	(33,822,227)	21,082	100,899		121,981
Sep-19	(5,207,183)	(28,493,063)	(33,700,247)	21,082	100,899		121,981
Oct-19	(5,186,102)	(28,392,164)	(33,578,266)	21,082	100,899		121,981
Nov-19	(5,165,020)	(28,291,266)	(33,456,286)	21,082	100,899		121,981
Dec-19	(5,143,938)	(28,190,367)	(33,334,305)	21,082	100,899		121,981
Jan-20	(5,122,857)	(28,089,468)	(33,212,324)	21,082	100,899		121,981
Feb-20	(5,101,775)	(27,988,569)	(33,090,344)	21,082	100,899		121,981
Mar-20	(5,080,693)	(27,887,670)	(32,968,363)	21,082	100,899		121,981
Apr-20	(5,059,611)	(27,786,772)	(32,846,383)	21,082	100,899		121,981
May-20	(5,038,530)	(27,685,873)	(32,724,402)	21,082	100,899		121,981
Jun-20	(5,017,448)	(27,584,974)	(32,602,422)	21,082	100,899		121,981
Jul-20	(4,996,366)	(27,484,075)	(32,480,441)	21,082	100,899		121,981
Aug-20	(4,975,285)	(27,383,176)	(32,358,461)	21,082	100,899		121,981
Sep-20	(4,954,203)	(27,282,278)	(32,236,480)	21,082	100,899		121,981
Oct-20	(4,933,121)	(27,181,379)	(32,114,500)	21,082	100,899		121,981
Nov-20	(4,912,039)	(27,080,480)	(31,992,519)	21,082	100,899		121,981
Dec-20	(4,890,958)	(26,979,581)	(31,870,539)	21,082	100,899		121,981
Jan-21	(4,869,876)	(26,878,682)	(31,748,558)	21,082	100,899		121,981
Feb-21	(4,848,794)	(26,777,784)	(31,626,578)	21,082	100,899		121,981
Mar-21	(4,827,713)	(26,676,885)	(31,504,597)	21,082	100,899		121,981
Apr-21	(4,806,631)	(26,575,986)	(31,382,617)	21,082	100,899		121,981
May-21	(4,785,549)	(26,475,087)	(31,260,636)	21,082	100,899		121,981
Jun-21	(4,764,467)	(26,374,188)	(31,138,656)	21,082	100,899		121,981
Jul-21	(4,743,386)	(26,273,290)	(31,016,675)	21,082	100,899		121,981
Aug-21	(4,722,304)	(26,172,391)	(30,894,695)	21,082	100,899		121,981
Sep-21	(4,701,222)	(26,071,492)	(30,772,714)	21,082	100,899		121,981
Oct-21	(4,680,141)	(25,970,593)	(30,650,734)	21,082	100,899		121,981
Nov-21	(4,659,059)	(25,869,694)	(30,528,753)	21,082	100,899		121,981
Dec-21	(4,637,977)	(25,768,796)	(30,406,773)	21,082	100,899		121,981
<b>New Rate Set</b>	(4,616,895)	(25,339,316)	(29,956,211)	21,082		429,480	450,562
Feb-22	(4,595,814)	(24,909,836)	(29,505,649)	21,082		429,480	450,562
Mar-22	(4,574,732)	(24,480,356)	(29,055,088)	21,082		429,480	450,562
Apr-22	(4,553,650)	(24,050,876)	(28,604,526)	21,082		429,480	450,562
May-22	(4,532,569)	(23,621,396)	(28,153,965)	21,082		429,480	450,562
Jun-22	(4,511,487)	(23,191,916)	(27,703,403)	21,082		429,480	450,562
Jul-22	(4,490,405)	(22,762,436)	(27,252,841)	21,082		429,480	450,562
Aug-22	(4,469,323)	(22,332,956)	(26,802,280)	21,082		429,480	450,562
Sep-22	(4,448,242)	(21,903,476)	(26,351,718)	21,082		429,480	450,562
Oct-22	(4,427,160)	(21,473,996)	(25,901,156)	21,082		429,480	450,562
Nov-22	(4,406,078)	(21,044,516)	(25,450,595)	21,082		429,480	450,562
Dec-22	(4,384,997)	(20,615,036)	(25,000,033)	21,082		429,480	450,562
Jan-23	(4,363,915)	(20,185,557)	(24,549,471)	21,082		429,480	450,562
Feb-23	(4,342,833)	(19,756,077)	(24,098,910)	21,082		429,480	450,562

Atmos Energy Corporation, Kentucky/Mid-States Division  
Kentucky Jurisdiction Case No. 2021-00214  
Base Period: Twelve Months Ended September 30, 2021  
Forecasted Test Period: Twelve Months Ended December 31, 2022  
Deferred Liability Amortization

**ADIT Excess Deferred Liabilities**  
**Account 2530 - 27909**

**Forecasted Test Period**

Test Period Ending Balance	Test Period 13- Month Balance	Test Period Amort. Expense
\$ (25,000,033)	\$ (27,703,403)	\$ 5,406,740

**Full Amortization Schedule**

	Balance			Amortization			
	Protected	Unprotected	Total Reg Liability	Protected	Unprotected	Unprotected	Total
Mar-23	(4,321,751)	(19,326,597)	(23,648,348)	21,082		429,480	450,562
Apr-23	(4,300,670)	(18,897,117)	(23,197,786)	21,082		429,480	450,562
May-23	(4,279,588)	(18,467,637)	(22,747,225)	21,082		429,480	450,562
Jun-23	(4,258,506)	(18,038,157)	(22,296,663)	21,082		429,480	450,562
Jul-23	(4,237,425)	(17,608,677)	(21,846,102)	21,082		429,480	450,562
Aug-23	(4,216,343)	(17,179,197)	(21,395,540)	21,082		429,480	450,562
Sep-23	(4,195,261)	(16,749,717)	(20,944,978)	21,082		429,480	450,562
Oct-23	(4,174,179)	(16,320,237)	(20,494,417)	21,082		429,480	450,562
Nov-23	(4,153,098)	(15,890,757)	(20,043,855)	21,082		429,480	450,562
Dec-23	(4,132,016)	(15,461,277)	(19,593,293)	21,082		429,480	450,562
Jan-24	(4,110,934)	(15,031,797)	(19,142,732)	21,082		429,480	450,562
Feb-24	(4,089,853)	(14,602,318)	(18,692,170)	21,082		429,480	450,562
Mar-24	(4,068,771)	(14,172,838)	(18,241,608)	21,082		429,480	450,562
Apr-24	(4,047,689)	(13,743,358)	(17,791,047)	21,082		429,480	450,562
May-24	(4,026,607)	(13,313,878)	(17,340,485)	21,082		429,480	450,562
Jun-24	(4,005,526)	(12,884,398)	(16,889,924)	21,082		429,480	450,562
Jul-24	(3,984,444)	(12,454,918)	(16,439,362)	21,082		429,480	450,562
Aug-24	(3,963,362)	(12,025,438)	(15,988,800)	21,082		429,480	450,562
Sep-24	(3,942,281)	(11,595,958)	(15,538,239)	21,082		429,480	450,562
Oct-24	(3,921,199)	(11,166,478)	(15,087,677)	21,082		429,480	450,562
Nov-24	(3,900,117)	(10,736,998)	(14,637,115)	21,082		429,480	450,562
Dec-24	(3,879,035)	(10,307,518)	(14,186,554)	21,082		429,480	450,562
Jan-25	(3,857,954)	(9,878,038)	(13,735,992)	21,082		429,480	450,562
Feb-25	(3,836,872)	(9,448,558)	(13,285,430)	21,082		429,480	450,562
Mar-25	(3,815,790)	(9,019,078)	(12,834,869)	21,082		429,480	450,562
Apr-25	(3,794,709)	(8,589,599)	(12,384,307)	21,082		429,480	450,562
May-25	(3,773,627)	(8,160,119)	(11,933,745)	21,082		429,480	450,562
Jun-25	(3,752,545)	(7,730,639)	(11,483,184)	21,082		429,480	450,562
Jul-25	(3,731,463)	(7,301,159)	(11,032,622)	21,082		429,480	450,562
Aug-25	(3,710,382)	(6,871,679)	(10,582,061)	21,082		429,480	450,562
Sep-25	(3,689,300)	(6,442,199)	(10,131,499)	21,082		429,480	450,562
Oct-25	(3,668,218)	(6,012,719)	(9,680,937)	21,082		429,480	450,562
Nov-25	(3,647,137)	(5,583,239)	(9,230,376)	21,082		429,480	450,562
Dec-25	(3,626,055)	(5,153,759)	(8,779,814)	21,082		429,480	450,562
Jan-26	(3,604,973)	(4,724,279)	(8,329,252)	21,082		429,480	450,562
Feb-26	(3,583,891)	(4,294,799)	(7,878,691)	21,082		429,480	450,562
Mar-26	(3,562,810)	(3,865,319)	(7,428,129)	21,082		429,480	450,562
Apr-26	(3,541,728)	(3,435,839)	(6,977,567)	21,082		429,480	450,562
May-26	(3,520,646)	(3,006,359)	(6,527,006)	21,082		429,480	450,562
Jun-26	(3,499,565)	(2,576,880)	(6,076,444)	21,082		429,480	450,562
Jul-26	(3,478,483)	(2,147,400)	(5,625,883)	21,082		429,480	450,562
Aug-26	(3,457,401)	(1,717,920)	(5,175,321)	21,082		429,480	450,562
Sep-26	(3,436,319)	(1,288,440)	(4,724,759)	21,082		429,480	450,562
Oct-26	(3,415,238)	(858,960)	(4,274,198)	21,082		429,480	450,562
Nov-26	(3,394,156)	(429,480)	(3,823,636)	21,082		429,480	450,562
<b>End of 5 Year Acceleration</b>	<b>(3,373,074)</b>	<b>0</b>	<b>(3,373,074)</b>	<b>21,082</b>		<b>429,480</b>	<b>450,562</b>
Jan-27	(3,351,993)	0	(3,351,993)	21,082			21,082
Feb-27	(3,330,911)	0	(3,330,911)	21,082			21,082
Mar-27	(3,309,829)	0	(3,309,829)	21,082			21,082
Apr-27	(3,288,747)	0	(3,288,747)	21,082			21,082
May-27	(3,267,666)	0	(3,267,666)	21,082			21,082
Jun-27	(3,246,584)	0	(3,246,584)	21,082			21,082
Jul-27	(3,225,502)	0	(3,225,502)	21,082			21,082
Aug-27	(3,204,421)	0	(3,204,421)	21,082			21,082
Sep-27	(3,183,339)	0	(3,183,339)	21,082			21,082
Oct-27	(3,162,257)	0	(3,162,257)	21,082			21,082
Nov-27	(3,141,175)	0	(3,141,175)	21,082			21,082
Dec-27	(3,120,094)	0	(3,120,094)	21,082			21,082
Jan-28	(3,099,012)	0	(3,099,012)	21,082			21,082



Atmos Energy Corporation, Kentucky/Mid-States Division  
Kentucky Jurisdiction Case No. 2021-00214  
Base Period: Twelve Months Ended September 30, 2021  
Forecasted Test Period: Twelve Months Ended December 31, 2022  
Deferred Liability Amortization

**ADIT Excess Deferred Liabilities**  
**Account 2530 - 27909**

**Forecasted Test Period**

Test Period Ending Balance	Test Period 13- Month Balance	Test Period Amort. Expense
\$ (25,000,033)	\$ (27,703,403)	\$ 5,406,740

**Full Amortization Schedule**

	Balance			Amortization			
	Protected	Unprotected	Total Reg Liability	Protected	Unprotected	Accelerated Unprotected	Total
Feb-28	(3,077,930)	0	(3,077,930)	21,082			21,082
Mar-28	(3,056,849)	0	(3,056,849)	21,082			21,082
Apr-28	(3,035,767)	0	(3,035,767)	21,082			21,082
May-28	(3,014,685)	0	(3,014,685)	21,082			21,082
Jun-28	(2,993,603)	0	(2,993,603)	21,082			21,082
Jul-28	(2,972,522)	0	(2,972,522)	21,082			21,082
Aug-28	(2,951,440)	0	(2,951,440)	21,082			21,082
Sep-28	(2,930,358)	0	(2,930,358)	21,082			21,082
Oct-28	(2,909,277)	0	(2,909,277)	21,082			21,082
Nov-28	(2,888,195)	0	(2,888,195)	21,082			21,082
Dec-28	(2,867,113)	0	(2,867,113)	21,082			21,082
Jan-29	(2,846,031)	0	(2,846,031)	21,082			21,082
Feb-29	(2,824,950)	0	(2,824,950)	21,082			21,082
Mar-29	(2,803,868)	0	(2,803,868)	21,082			21,082
Apr-29	(2,782,786)	0	(2,782,786)	21,082			21,082
May-29	(2,761,705)	0	(2,761,705)	21,082			21,082
Jun-29	(2,740,623)	0	(2,740,623)	21,082			21,082
Jul-29	(2,719,541)	0	(2,719,541)	21,082			21,082
Aug-29	(2,698,459)	0	(2,698,459)	21,082			21,082
Sep-29	(2,677,378)	0	(2,677,378)	21,082			21,082
Oct-29	(2,656,296)	0	(2,656,296)	21,082			21,082
Nov-29	(2,635,214)	0	(2,635,214)	21,082			21,082
Dec-29	(2,614,133)	0	(2,614,133)	21,082			21,082
Jan-30	(2,593,051)	0	(2,593,051)	21,082			21,082
Feb-30	(2,571,969)	0	(2,571,969)	21,082			21,082
Mar-30	(2,550,887)	0	(2,550,887)	21,082			21,082
Apr-30	(2,529,806)	0	(2,529,806)	21,082			21,082
May-30	(2,508,724)	0	(2,508,724)	21,082			21,082
Jun-30	(2,487,642)	0	(2,487,642)	21,082			21,082
Jul-30	(2,466,561)	0	(2,466,561)	21,082			21,082
Aug-30	(2,445,479)	0	(2,445,479)	21,082			21,082
Sep-30	(2,424,397)	0	(2,424,397)	21,082			21,082
Oct-30	(2,403,315)	0	(2,403,315)	21,082			21,082
Nov-30	(2,382,234)	0	(2,382,234)	21,082			21,082
Dec-30	(2,361,152)	0	(2,361,152)	21,082			21,082
Jan-31	(2,340,070)	0	(2,340,070)	21,082			21,082
Feb-31	(2,318,989)	0	(2,318,989)	21,082			21,082
Mar-31	(2,297,907)	0	(2,297,907)	21,082			21,082
Apr-31	(2,276,825)	0	(2,276,825)	21,082			21,082
May-31	(2,255,743)	0	(2,255,743)	21,082			21,082
Jun-31	(2,234,662)	0	(2,234,662)	21,082			21,082
Jul-31	(2,213,580)	0	(2,213,580)	21,082			21,082
Aug-31	(2,192,498)	0	(2,192,498)	21,082			21,082
Sep-31	(2,171,417)	0	(2,171,417)	21,082			21,082
Oct-31	(2,150,335)	0	(2,150,335)	21,082			21,082
Nov-31	(2,129,253)	0	(2,129,253)	21,082			21,082
Dec-31	(2,108,171)	0	(2,108,171)	21,082			21,082
Jan-32	(2,087,090)	0	(2,087,090)	21,082			21,082
Feb-32	(2,066,008)	0	(2,066,008)	21,082			21,082
Mar-32	(2,044,926)	0	(2,044,926)	21,082			21,082
Apr-32	(2,023,845)	0	(2,023,845)	21,082			21,082
May-32	(2,002,763)	0	(2,002,763)	21,082			21,082
Jun-32	(1,981,681)	0	(1,981,681)	21,082			21,082
Jul-32	(1,960,599)	0	(1,960,599)	21,082			21,082
Aug-32	(1,939,518)	0	(1,939,518)	21,082			21,082
Sep-32	(1,918,436)	0	(1,918,436)	21,082			21,082
Oct-32	(1,897,354)	0	(1,897,354)	21,082			21,082
Nov-32	(1,876,273)	0	(1,876,273)	21,082			21,082
Dec-32	(1,855,191)	0	(1,855,191)	21,082			21,082

Atmos Energy Corporation, Kentucky/Mid-States Division  
Kentucky Jurisdiction Case No. 2021-00214  
Base Period: Twelve Months Ended September 30, 2021  
Forecasted Test Period: Twelve Months Ended December 31, 2022  
Deferred Liability Amortization

**ADIT Excess Deferred Liabilities**  
**Account 2530 - 27909**

**Forecasted Test Period**

Test Period Ending Balance	Test Period 13- Month Balance	Test Period Amort. Expense
\$ (25,000,033)	\$ (27,703,403)	\$ 5,406,740

**Full Amortization Schedule**

	Balance			Amortization			
	Protected	Unprotected	Total Reg Liability	Protected	Unprotected	Accelerated Unprotected	Total
Jan-33	(1,834,109)	0	(1,834,109)	21,082			21,082
Feb-33	(1,813,027)	0	(1,813,027)	21,082			21,082
Mar-33	(1,791,946)	0	(1,791,946)	21,082			21,082
Apr-33	(1,770,864)	0	(1,770,864)	21,082			21,082
May-33	(1,749,782)	0	(1,749,782)	21,082			21,082
Jun-33	(1,728,701)	0	(1,728,701)	21,082			21,082
Jul-33	(1,707,619)	0	(1,707,619)	21,082			21,082
Aug-33	(1,686,537)	0	(1,686,537)	21,082			21,082
Sep-33	(1,665,455)	0	(1,665,455)	21,082			21,082
Oct-33	(1,644,374)	0	(1,644,374)	21,082			21,082
Nov-33	(1,623,292)	0	(1,623,292)	21,082			21,082
Dec-33	(1,602,210)	0	(1,602,210)	21,082			21,082
Jan-34	(1,581,129)	0	(1,581,129)	21,082			21,082
Feb-34	(1,560,047)	0	(1,560,047)	21,082			21,082
Mar-34	(1,538,965)	0	(1,538,965)	21,082			21,082
Apr-34	(1,517,883)	0	(1,517,883)	21,082			21,082
May-34	(1,496,802)	0	(1,496,802)	21,082			21,082
Jun-34	(1,475,720)	0	(1,475,720)	21,082			21,082
Jul-34	(1,454,638)	0	(1,454,638)	21,082			21,082
Aug-34	(1,433,557)	0	(1,433,557)	21,082			21,082
Sep-34	(1,412,475)	0	(1,412,475)	21,082			21,082
Oct-34	(1,391,393)	0	(1,391,393)	21,082			21,082
Nov-34	(1,370,311)	0	(1,370,311)	21,082			21,082
Dec-34	(1,349,230)	0	(1,349,230)	21,082			21,082
Jan-35	(1,328,148)	0	(1,328,148)	21,082			21,082
Feb-35	(1,307,066)	0	(1,307,066)	21,082			21,082
Mar-35	(1,285,985)	0	(1,285,985)	21,082			21,082
Apr-35	(1,264,903)	0	(1,264,903)	21,082			21,082
May-35	(1,243,821)	0	(1,243,821)	21,082			21,082
Jun-35	(1,222,739)	0	(1,222,739)	21,082			21,082
Jul-35	(1,201,658)	0	(1,201,658)	21,082			21,082
Aug-35	(1,180,576)	0	(1,180,576)	21,082			21,082
Sep-35	(1,159,494)	0	(1,159,494)	21,082			21,082
Oct-35	(1,138,413)	0	(1,138,413)	21,082			21,082
Nov-35	(1,117,331)	0	(1,117,331)	21,082			21,082
Dec-35	(1,096,249)	0	(1,096,249)	21,082			21,082
Jan-36	(1,075,167)	0	(1,075,167)	21,082			21,082
Feb-36	(1,054,086)	0	(1,054,086)	21,082			21,082
Mar-36	(1,033,004)	0	(1,033,004)	21,082			21,082
Apr-36	(1,011,922)	0	(1,011,922)	21,082			21,082
May-36	(990,841)	0	(990,841)	21,082			21,082
Jun-36	(969,759)	0	(969,759)	21,082			21,082
Jul-36	(948,677)	0	(948,677)	21,082			21,082
Aug-36	(927,595)	0	(927,595)	21,082			21,082
Sep-36	(906,514)	0	(906,514)	21,082			21,082
Oct-36	(885,432)	0	(885,432)	21,082			21,082
Nov-36	(864,350)	0	(864,350)	21,082			21,082
Dec-36	(843,269)	0	(843,269)	21,082			21,082
Jan-37	(822,187)	0	(822,187)	21,082			21,082
Feb-37	(801,105)	0	(801,105)	21,082			21,082
Mar-37	(780,023)	0	(780,023)	21,082			21,082
Apr-37	(758,942)	0	(758,942)	21,082			21,082
May-37	(737,860)	0	(737,860)	21,082			21,082
Jun-37	(716,778)	0	(716,778)	21,082			21,082
Jul-37	(695,697)	0	(695,697)	21,082			21,082
Aug-37	(674,615)	0	(674,615)	21,082			21,082
Sep-37	(653,533)	0	(653,533)	21,082			21,082
Oct-37	(632,451)	0	(632,451)	21,082			21,082
Nov-37	(611,370)	0	(611,370)	21,082			21,082

Atmos Energy Corporation, Kentucky/Mid-States Division  
Kentucky Jurisdiction Case No. 2021-00214  
Base Period: Twelve Months Ended September 30, 2021  
Forecasted Test Period: Twelve Months Ended December 31, 2022  
Deferred Liability Amortization

**ADIT Excess Deferred Liabilities**  
**Account 2530 - 27909**

**Forecasted Test Period**

<b>Test Period</b>	<b>Test Period 13-</b>	<b>Test Period</b>
<b>Ending Balance</b>	<b>Month Balance</b>	<b>Amort. Expense</b>
\$ (25,000,033)	\$ (27,703,403)	\$ 5,406,740

**Full Amortization Schedule**

	<b>Balance</b>			<b>Amortization</b>			
	<b>Protected</b>	<b>Unprotected</b>	<b>Total Reg Liability</b>	<b>Protected</b>	<b>Unprotected</b>	<b>Accelerated Unprotected</b>	<b>Total</b>
Dec-37	(590,288)	0	(590,288)	21,082			21,082
Jan-38	(569,206)	0	(569,206)	21,082			21,082
Feb-38	(548,125)	0	(548,125)	21,082			21,082
Mar-38	(527,043)	0	(527,043)	21,082			21,082
Apr-38	(505,961)	0	(505,961)	21,082			21,082
May-38	(484,879)	0	(484,879)	21,082			21,082
Jun-38	(463,798)	0	(463,798)	21,082			21,082
Jul-38	(442,716)	0	(442,716)	21,082			21,082
Aug-38	(421,634)	0	(421,634)	21,082			21,082
Sep-38	(400,553)	0	(400,553)	21,082			21,082
Oct-38	(379,471)	0	(379,471)	21,082			21,082
Nov-38	(358,389)	0	(358,389)	21,082			21,082
Dec-38	(337,307)	0	(337,307)	21,082			21,082
Jan-39	(316,226)	0	(316,226)	21,082			21,082
Feb-39	(295,144)	0	(295,144)	21,082			21,082
Mar-39	(274,062)	0	(274,062)	21,082			21,082
Apr-39	(252,981)	0	(252,981)	21,082			21,082
May-39	(231,899)	0	(231,899)	21,082			21,082
Jun-39	(210,817)	0	(210,817)	21,082			21,082
Jul-39	(189,735)	0	(189,735)	21,082			21,082
Aug-39	(168,654)	0	(168,654)	21,082			21,082
Sep-39	(147,572)	0	(147,572)	21,082			21,082
Oct-39	(126,490)	0	(126,490)	21,082			21,082
Nov-39	(105,409)	0	(105,409)	21,082			21,082
Dec-39	(84,327)	0	(84,327)	21,082			21,082
Jan-40	(63,245)	0	(63,245)	21,082			21,082
Feb-40	(42,163)	0	(42,163)	21,082			21,082
Mar-40	(21,082)	0	(21,082)	21,082			21,082
Apr-40	(0)	0	(0)	21,082			21,082

**Atmos Energy Corporation, Kentucky/Mid-States Division**  
**Kentucky Jurisdiction Case No. 2021-00214**  
**Base Period: Twelve Months Ended September 30, 2021**  
**Forecasted Test Period: Twelve Months Ended December 31, 2022**

**Regulatory Liability: Cost of Service Reserve 2420-27910**

		<b>12-Months Amortization Beginning Jan-2022 <sup>1</sup></b>			<b>12-Months Amortization Beginning Mar-2022 <sup>2</sup></b>		
		End of Month		End of Month			
		Balance	Amortization	Balance	Amortization	Balance	Amortization
	Jan-2018						
	Feb-2018						
	Mar-2018						
	Apr-2018						
	May-2018						
	Jun-2018						
	Jul-2018						
	Aug-2018						
	Sep-2018						
	Oct-2018						
	Nov-2018						
	Dec-2018						
	Jan-2019						
	Feb-2019	\$ (1,424,111)	\$ -	\$ 43,524	\$ (1,424,111)	\$ -	
	Mar-2019	\$ (1,424,111)	\$ -	\$ 43,555	\$ (1,424,111)	\$ -	
	Apr-2019	\$ (1,424,111)	\$ -	\$ 43,585	\$ (1,424,111)	\$ -	
	May-2019	\$ (1,424,111)	\$ -	\$ 43,616	\$ (1,424,111)	\$ -	
	Jun-2019	\$ (1,424,111)	\$ -	\$ 43,646	\$ (1,424,111)	\$ -	
	Jul-2019	\$ (1,424,111)	\$ -	\$ 43,677	\$ (1,424,111)	\$ -	
	Aug-2019	\$ (1,424,111)	\$ -	\$ 43,708	\$ (1,424,111)	\$ -	
	Sep-2019	\$ (1,424,111)	\$ -	\$ 43,738	\$ (1,424,111)	\$ -	
	Oct-2019	\$ (1,424,111)	\$ -	\$ 43,769	\$ (1,424,111)	\$ -	
	Nov-2019	\$ (1,424,111)	\$ -	\$ 43,799	\$ (1,424,111)	\$ -	
	Dec-2019	\$ (1,424,111)	\$ -	\$ 43,830	\$ (1,424,111)	\$ -	
	Jan-2020	\$ (1,424,111)	\$ -	\$ 43,861	\$ (1,424,111)	\$ -	
	Feb-2020	\$ (1,424,111)	\$ -	\$ 43,890	\$ (1,424,111)	\$ -	
	Mar-2020	\$ (1,424,111)	\$ -	\$ 43,921	\$ (1,424,111)	\$ -	
	Apr-2020	\$ (1,424,111)	\$ -	\$ 43,951	\$ (1,424,111)	\$ -	
	May-2020	\$ (1,041,158)	\$ 382,953	\$ 43,982	\$ (1,041,158)	\$ 382,953	
	Jun-2020	\$ (581,432)	\$ 459,726	\$ 44,012	\$ (581,432)	\$ 459,726	
	Jul-2020	\$ (149,384)	\$ 432,048	\$ 44,043	\$ (149,384)	\$ 432,048	
	Aug-2020	\$ (57,684)	\$ 91,700	\$ 44,074	\$ (57,684)	\$ 91,700	
	Sep-2020	\$ (57,684)	\$ -	\$ 44,104	\$ (57,684)	\$ -	
<b>Base Year</b>	Oct-2020	\$ (57,684)	\$ -	\$ 44,135	\$ (57,684)	\$ -	
	Nov-2020	\$ (57,684)	\$ -	\$ 44,165	\$ (57,684)	\$ -	
	Dec-2020	\$ (57,684)	\$ -	\$ 44,196	\$ (57,684)	\$ -	
	Jan-2021	\$ (57,684)	\$ -	\$ 44,227	\$ (57,684)	\$ -	
	Feb-2021	\$ (57,684)	\$ -	\$ 44,255	\$ (57,684)	\$ -	
	Mar-2021	\$ (57,684)	\$ -	\$ 44,286	\$ (57,684)	\$ -	
	Apr-2021	\$ (57,684)	\$ -	\$ 44,316	\$ (57,684)	\$ -	
	May-2021	\$ (57,684)	\$ -	\$ 44,347	\$ (57,684)	\$ -	
	Jun-2021	\$ (57,684)	\$ -	\$ 44,377	\$ (57,684)	\$ -	
	Jul-2021	\$ (57,684)	\$ -	\$ 44,408	\$ (57,684)	\$ -	
	Aug-2021	\$ (57,684)	\$ -	\$ 44,439	\$ (57,684)	\$ -	
	Sep-2021	\$ (57,684)	\$ -	\$ 44,469	\$ (57,684)	\$ -	
Oct-2021	\$ (57,684)	\$ -	\$ 44,500	\$ (57,684)	\$ -		
Nov-2021	\$ (57,684)	\$ -	\$ 44,530	\$ (57,684)	\$ -		
Dec-2021	\$ (57,684)	\$ -	\$ 44,561	\$ (57,684)	\$ -		
<b>Test Year</b>	Jan-2022	\$ (52,877)	\$ 4,807	\$ 44,592	\$ (57,684)	\$ -	
	Feb-2022	\$ (48,070)	\$ 4,807	\$ 44,620	\$ (57,684)	\$ -	
	Mar-2022	\$ (43,263)	\$ 4,807	\$ 44,651	\$ (52,877)	\$ 4,807	
	Apr-2022	\$ (38,456)	\$ 4,807	\$ 44,681	\$ (48,070)	\$ 4,807	
	May-2022	\$ (33,649)	\$ 4,807	\$ 44,712	\$ (43,263)	\$ 4,807	
	Jun-2022	\$ (28,842)	\$ 4,807	\$ 44,742	\$ (38,456)	\$ 4,807	
	Jul-2022	\$ (24,035)	\$ 4,807	\$ 44,773	\$ (33,649)	\$ 4,807	
	Aug-2022	\$ (19,228)	\$ 4,807	\$ 44,804	\$ (28,842)	\$ 4,807	
	Sep-2022	\$ (14,421)	\$ 4,807	\$ 44,834	\$ (24,035)	\$ 4,807	
	Oct-2022	\$ (9,614)	\$ 4,807	\$ 44,865	\$ (19,228)	\$ 4,807	
	Nov-2022	\$ (4,807)	\$ 4,807	\$ 44,895	\$ (14,421)	\$ 4,807	
	Dec-2022	\$ -	\$ 4,807	\$ 44,926	\$ (9,614)	\$ 4,807	
Jan-2023	\$ -	\$ -	\$ 44,957	\$ (4,807)	\$ 4,807		
Feb-2023	\$ -	\$ -	\$ 44,985	\$ -	\$ 4,807		

<sup>1</sup> Data sources: relied file "Distribution COS summary 5.31.21.xlsx" and revenue requirements model worksheet "F.12" in file "2021 KY Rev Req Model.xlsx" attached to the Company's response to Staff DR No. 1-55.

<sup>2</sup> Data sources: relied file "Distribution COS summary 5.31.21.xlsx" and revenue requirements model worksheet "WP F.12" in file "2021 KY Rev Req Model.xlsx" attached to the Company's response to Staff DR No. 1-55.

**Atmos Energy Corporation, Kentucky/Mid-States Division**  
**Kentucky Jurisdiction Case No. 2021-00214**  
**Base Period: Twelve Months Ended September 30, 2021**  
**Forecasted Test Period: Twelve Months Ended December 31, 2022**

**Regulatory Liability: Depreciation Reserve 2540-27913**

Line No.	End of Month	12-Months Amortization Beginning Jan-2022 <sup>1</sup>			12-Months Amortization Beginning Mar-2022 <sup>2</sup>			
		Balance	Accrual	Amortization	Balance	Accrual	Amortization	
1	May-2019	\$ (306,399)	\$ (306,399)	\$ -	May-2019	(306,399)	(306,399)	-
2	Jun-2019	\$ (612,797)	\$ (306,399)	\$ -	Jun-2019	(612,797)	(306,399)	-
3	Jul-2019	\$ (919,196)	\$ (306,399)	\$ -	Jul-2019	(919,196)	(306,399)	-
4	Aug-2019	\$ (1,225,595)	\$ (306,399)	\$ -	Aug-2019	(1,225,595)	(306,399)	-
5	Sep-2019	\$ (1,531,993)	\$ (306,399)	\$ -	Sep-2019	(1,531,993)	(306,399)	-
6	Oct-2019	\$ (1,838,392)	\$ (306,399)	\$ -	Oct-2019	(1,838,392)	(306,399)	-
7	Nov-2019	\$ (2,144,791)	\$ (306,399)	\$ -	Nov-2019	(2,144,791)	(306,399)	-
8	Dec-2019	\$ (2,451,189)	\$ (306,399)	\$ -	Dec-2019	(2,451,189)	(306,399)	-
9	Jan-2020	\$ (2,757,588)	\$ (306,399)	\$ -	Jan-2020	(2,757,588)	(306,399)	-
10	Feb-2020	\$ (3,063,987)	\$ (306,399)	\$ -	Feb-2020	(3,063,987)	(306,399)	-
11	Mar-2020	\$ (3,370,385)	\$ (306,399)	\$ -	Mar-2020	(3,370,385)	(306,399)	-
12	Apr-2020	\$ (3,676,784)	\$ (306,399)	\$ -	Apr-2020	(3,676,784)	(306,399)	-
13	May-2020	\$ (3,983,183)	\$ (306,399)	\$ -	May-2020	(3,983,183)	(306,399)	-
14	Jun-2020	\$ (4,289,581)	\$ (306,399)	\$ -	Jun-2020	(4,289,581)	(306,399)	-
15	Jul-2020	\$ (4,595,980)	\$ (306,399)	\$ -	Jul-2020	(4,595,980)	(306,399)	-
16	Aug-2020	\$ (4,902,379)	\$ (306,399)	\$ -	Aug-2020	(4,902,379)	(306,399)	-
17	Sep-2020	\$ (5,208,777)	\$ (306,399)	\$ -	Sep-2020	(5,208,777)	(306,399)	-
18	Oct-2020	\$ (5,515,176)	\$ (306,399)	\$ -	Oct-2020	(5,515,176)	(306,399)	-
19	Nov-2020	\$ (5,821,575)	\$ (306,399)	\$ -	Nov-2020	(5,821,575)	(306,399)	-
20	Dec-2020	\$ (6,127,973)	\$ (306,399)	\$ -	Dec-2020	(6,127,973)	(306,399)	-
21	Jan-2021	\$ (6,434,372)	\$ (306,399)	\$ -	Jan-2021	(6,434,372)	(306,399)	-
22	Feb-2021	\$ (6,740,771)	\$ (306,399)	\$ -	Feb-2021	(6,740,771)	(306,399)	-
23	Mar-2021	\$ (7,047,169)	\$ (306,399)	\$ -	Mar-2021	(7,047,169)	(306,399)	-
24	Apr-2021	\$ (7,353,568)	\$ (306,399)	\$ -	Apr-2021	(7,353,568)	(306,399)	-
25	May-2021	\$ (7,659,967)	\$ (306,399)	\$ -	May-2021	(7,659,967)	(306,399)	-
26	Jun-2021	\$ (7,966,365)	\$ (306,399)	\$ -	Jun-2021	(7,966,365)	(306,399)	-
27	Jul-2021	\$ (8,272,764)	\$ (306,399)	\$ -	Jul-2021	(8,272,764)	(306,399)	-
28	Aug-2021	\$ (8,579,163)	\$ (306,399)	\$ -	Aug-2021	(8,579,163)	(306,399)	-
29	Sep-2021	\$ (8,885,561)	\$ (306,399)	\$ -	Sep-2021	(8,885,561)	(306,399)	-
30	Oct-2021	\$ (9,191,960)	\$ (306,399)	\$ -	Oct-2021	(9,191,960)	(306,399)	-
31	Nov-2021	\$ (9,498,359)	\$ (306,399)	\$ -	Nov-2021	(9,498,359)	(306,399)	-
32	Dec-2021	\$ (9,804,757)	\$ (306,399)	\$ -	Dec-2021	(9,804,757)	(306,399)	-
33	Jan-2022	\$ (8,987,694)	\$ -	\$ 817,063	Jan-2022	(10,111,156)	(306,399)	-
34	Feb-2022	\$ (8,170,631)	\$ -	\$ 817,063	Feb-2022	(10,417,555)	(306,399)	-
35	Mar-2022	\$ (7,353,568)	\$ -	\$ 817,063	Mar-2022	(9,549,425)	-	868,130
36	Apr-2022	\$ (6,536,505)	\$ -	\$ 817,063	Apr-2022	(8,681,296)	-	868,130
37	May-2022	\$ (5,719,442)	\$ -	\$ 817,063	May-2022	(7,813,166)	-	868,130
38	Jun-2022	\$ (4,902,379)	\$ -	\$ 817,063	Jun-2022	(6,945,037)	-	868,130
39	Jul-2022	\$ (4,085,316)	\$ -	\$ 817,063	Jul-2022	(6,076,907)	-	868,130
40	Aug-2022	\$ (3,268,252)	\$ -	\$ 817,063	Aug-2022	(5,208,777)	-	868,130
41	Sep-2022	\$ (2,451,189)	\$ -	\$ 817,063	Sep-2022	(4,340,648)	-	868,130
42	Oct-2022	\$ (1,634,126)	\$ -	\$ 817,063	Oct-2022	(3,472,518)	-	868,130
43	Nov-2022	\$ (817,063)	\$ -	\$ 817,063	Nov-2022	(2,604,389)	-	868,130
44	Dec-2022	\$ -	\$ -	\$ 817,063	Dec-2022	(1,736,259)	-	868,130
45	Jan-2023	\$ -	\$ -	\$ -	Jan-2023	(868,130)	-	868,130
46	Feb-2023	\$ -	\$ -	\$ -	Feb-2023	(0)	-	868,130

<sup>1</sup> Data sources: relied file "KY Depreciation Reg Liability Summary.xlsx" and revenue requirements model worksheet "F.12" in file "2021 KY Rev Req Model.xlsx" attached to the Company's response to Staff DR No. 1-55.

<sup>2</sup> Data sources: relied file "KY Depreciation Reg Liability Summary.xlsx" and revenue requirements model worksheet "WP F.12" in file "2021 KY Rev Req Model.xlsx" attached to the Company's response to Staff DR No. 1-55.

**Atmos Energy Corporation, Kentucky/Mid-States Division**  
**Kentucky Jurisdiction Case No. 2021-00214**  
**Projected Rate Case Expense**

Data:  Base Period  Forecasted Period FR 16(8)(f)  
Type of Filing:  Original  Updated  Revised Schedule F-6  
Workpaper Reference No(s) Witness: Christian

Line No.	Description	Amount
1	<b>Consulting</b>	
2	Class Cost Study - P. Raab	\$ 22,990
3	Depreciation Study - D. Watson	82,441
4	Cost of Capital - D'Ascendis, D.	45,857
5	sub-total	<u>\$ 151,287</u>
6		
7	<b>Legal Fees</b>	
8	(J. Hughes/R. Hutchinson)	132,354
9		
10	<b>Employee Expense</b>	
11	(airfare, lodging, meals, etc.)	21,617
12		
13	<b>Miscellaneous Expense</b>	
14	(printing, advertising, etc.)	<u>93,838</u>
15		
16	<b>Total Projected Rate Case Expense</b>	<u>\$ 399,097</u>
17		
18	<b>Three (3) Year Amortization of Rate Case Expenses</b>	<u>\$ 133,032</u>

**Atmos Energy Corporation, Kentucky/Mid-States Division**  
**Kentucky Jurisdiction Case No. 2021-00214**  
**Projected Rate Case Expense**

Data:  Base Period  Forecasted Period FR 16(8)(f)  
 Type of Filing:  Original  Updated  Revised Schedule F-6  
 Workpaper Reference No(s) Witness: Christian

19			
20	<b>Rate Case (3 year Amortization)</b>	<b>Case No. 2018-00281</b>	
		Regulated	
		Asset	Amortization
		Balance	Expense
21			
22	Expense per Case No. 2018-00281 Final Order	\$ 189,861	
23		Apr-19	184,587 5,274
24		May-19	179,313 5,274
25		Jun-19	174,039 5,274
26		Jul-19	168,765 5,274
27		Aug-19	163,491 5,274
28		Sep-19	158,218 5,274
29		Oct-19	152,944 5,274
30		Nov-19	147,670 5,274
31		Dec-19	142,396 5,274
32		Jan-20	137,122 5,274
33		Feb-20	131,848 5,274
34		Mar-20	126,574 5,274
35		Apr-20	121,300 5,274
36		May-20	116,026 5,274
37		Jun-20	110,752 5,274
38		Jul-20	105,478 5,274
39		Aug-20	100,204 5,274
40			
41		Sep-20	94,931 5,274
42		Oct-20	89,657 5,274
43		Nov-20	84,383 5,274
44		Dec-20	79,109 5,274
45		Jan-21	73,835 5,274
46		Feb-21	68,561 5,274
47		Mar-21	63,287 5,274
48		Apr-21	58,013 5,274
49		May-21	52,739 5,274
50		Jun-21	47,465 5,274
51		Jul-21	42,191 5,274
52		Aug-21	36,917 5,274
53		Sep-21	31,644 5,274
54			63,287 68,561
55		(13 Month Average)	
56			
57			
58		Oct-21	26,370 5,274
59		Nov-21	21,096 5,274
60		Dec-21	15,822 5,274
61		Jan-22	10,548 5,274
62		Feb-22	5,274 5,274
63		Mar-22	0 5,274
64		Apr-22	0 0
65		May-22	0 0
66		Jun-22	0 0
67		Jul-22	0 0
68		Aug-22	0 0
69		Sep-22	0 0
70		Oct-22	0 0
71		Nov-22	0 0
72		Dec-22	0 0
73		Jan-23	0 0
74		Feb-23	0 0
75		Mar-23	0 0
76		Apr-23	0 0
77		May-23	0 0
78		Jun-23	0 0
79		Jul-23	0 0
80		Aug-23	0 0
81		Sep-23	0 0

**Atmos Energy Corporation, Kentucky/Mid-States Division**  
**Kentucky Jurisdiction Case No. 2021-00214**  
**Projected Rate Case Expense**

Data:  Base Period  Forecasted Period FR 16(8)(f)  
 Type of Filing:  Original  Updated  Revised Schedule F-6  
 Workpaper Reference No(s). Witness: Christian

82			
83	<b>Rate Case (3 year Amortization)</b>	<b>Case No. 2021-00214</b>	
		Regulated	
		Asset	Amortization
		Balance	Expense
84			
85		Dec-21	0
86		Jan-22	388,011
87		Feb-22	376,925
88		Mar-22	365,839
89		Apr-22	354,753
90		May-22	343,667
91		Jun-22	332,580
92		Jul-22	321,494
93		Aug-22	310,408
94		Sep-22	299,322
95		Oct-22	288,236
96		Nov-22	277,150
97		Dec-22	266,064
98			301,881
99			133,032
100		(13 Month Average)	
101			
102		Jan-23	254,978
103		Feb-23	243,892
104		Mar-23	232,806
105		Apr-23	221,720
106		May-23	210,634
107		Jun-23	199,548
108		Jul-23	188,462
109		Aug-23	177,376
110		Sep-23	166,290
111		Oct-23	155,204
112		Nov-23	144,118
113		Dec-23	133,032
114		Jan-24	121,946
115		Feb-24	110,860
116		Mar-24	99,774
117		Apr-24	88,688
118		May-24	77,602
119		Jun-24	66,516
120		Jul-24	55,430
121		Aug-24	44,344
122		Sep-24	33,258
123		Oct-24	22,172
124		Nov-24	11,086
125		Dec-24	0
126			



**Atmos Energy Corporation, Kentucky/Mid-States Division**  
**Kentucky Jurisdiction Case No. 2021-00214**  
**Projected Rate Case Expense**

Data:  Base Period  Forecasted Period FR 16(8)(f)  
 Type of Filing:  Original  Updated  Revised Schedule F-6  
 Workpaper Reference No(s). Witness: Christian

	Rate Case (3 year Amortization)	Cases Combined		
		Balance Total	Amortization Total	
127				
128				
129				
130		Sep-20	94,931	5,274
131		Oct-20	89,657	5,274
132		Nov-20	84,383	5,274
133		Dec-20	79,109	5,274
134		Jan-21	73,835	5,274
135		Feb-21	68,561	5,274
136		Mar-21	63,287	5,274
137		Apr-21	58,013	5,274
138		May-21	52,739	5,274
139		Jun-21	47,465	5,274
140		Jul-21	42,191	5,274
141		Aug-21	36,917	5,274
142		Sep-21	31,644	5,274
143		Oct-21	26,370	5,274
144		Nov-21	21,096	5,274
145		Dec-21	15,822	5,274
146		Jan-22	398,558	16,360
147		Feb-22	382,198	16,360
148		Mar-22	365,839	16,360
149		Apr-22	354,753	11,086
150		May-22	343,667	11,086
151		Jun-22	332,580	11,086
152		Jul-22	321,494	11,086
153		Aug-22	310,408	11,086
154		Sep-22	299,322	11,086
155		Oct-22	288,236	11,086
156		Nov-22	277,150	11,086
157		Dec-22	266,064	11,086
158			304,315	148,854
159			(13 Month Average Forecast Total)	
160				
161		Jan-23	254,978	11,086
162		Feb-23	243,892	11,086
163		Mar-23	232,806	11,086
164		Apr-23	221,720	11,086
165		May-23	210,634	11,086
166		Jun-23	199,548	11,086
167		Jul-23	188,462	11,086
168		Aug-23	177,376	11,086
169		Sep-23	166,290	11,086
170		Oct-23	155,204	11,086
171		Nov-23	144,118	11,086
172		Dec-23	133,032	11,086
173		Jan-24	121,946	11,086
174		Feb-24	110,860	11,086
175		Mar-24	99,774	11,086
176		Apr-24	88,688	11,086
177		May-24	77,602	11,086
178		Jun-24	66,516	11,086
179		Jul-24	55,430	11,086
180		Aug-24	44,344	11,086
181		Sep-24	33,258	11,086
182		Oct-24	22,172	11,086
183		Nov-24	11,086	11,086
184		Dec-24	0	11,086

Test Period

Forecast Period

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-29**  
**Page 1 of 1**

**REQUEST:**

Refer to the Direct Testimony of Mr. Christian at 39-40 and to the ratemaking adjustment made on Schedule C-2 to increase rate case amortization expense by \$161,141. Refer also to the computation of base period rate case amortization expense of \$112,330 and the forecast test period rate case amortization expense of \$161,141 on page 4 of Schedule F.6. Explain why the adjustment amount reflected is the full forecast test year amount as opposed to the net increase in expense of \$48,811 from the base year to the forecast test year, similar to the adjustment amounts calculated on other Schedule F adjustments.

**RESPONSE:**

Upon considering this request, the Company agrees that the adjustment should be the net increase in the rate case expense for the test year rather than the full forecast test year amount. However, the Company has recalculated this net increase to be \$80,293, for the reason explained below.

In recalculating the test year net increase in rate case expense amortization, the Company corrected the amortization of its 2018 rate case expense shown in its revenue requirement model. In researching a response to this question, the Company determined that the amortization for the 2018 rate case expense shown in the Company's revenue requirement model was incorrect. The model was showing the forecast 2018 rate case expense amortization as was originally filed in Case No. 2018-00281. The Company has corrected the amortization, reducing the 2018 rate case expense amortization to \$5,274 per month, consistent with what was adopted in the Final Order for that case and consistent with what is actually being amortized by the Company in its accounting records for the base year.

The test year net increase is calculated as follows:

Revised Base Year Rate Case Expense Amortization	\$ 68,561
Revised Test Year Rate Case Expense Amortization	<u>148,854</u>
Net Increase in Test Year Amortization	\$ 80,293

For calculations of the revised values, please see Schedule F.6 in the Company's revised revenue requirement model provided as a supplement to Staff DR No. 1-55.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-30**  
**Page 1 of 1**

**REQUEST:**

Refer to Schedules D.1, D.2.1, D.2.2, and D.2.3 of the Rev Req Model showing adjustments to revenues and expenses.

- a. Provide the electronic workpapers supporting these schedules.
- b. Disaggregate each of the revenue amounts shown on these schedules into base, PGA, PRP, and other revenue components.

**RESPONSE:**

- a. Please see the Company's response and supplemental response to Staff DR No. 1-55.
- b. The Company believes that the referenced schedules are broken down into the disaggregated components requested; therefore, the Company has no additional information to provide to this response.

Respondents: Josh Densman and Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-31**  
**Page 1 of 2**

**REQUEST:**

Refer to the Direct Testimony of Josh Densman.

- a. Explain why Mr. Densman did not address the effects of Covid-19 on the revenues reflected in the base period or the test year.
- b. Describe the effects of Covid-19 on the actual revenues in fiscal years 2020 (October 1, 2019 through September 30, 2020) and 2021 (October 1, 2020 through September 30, 2021).
- c. Describe all attempts made by the Company to quantify the effects of Covid-19 on actual revenues. Provide a copy of all such analyses, including all documents, such as studies, reports, correspondence, etc., and all calculations, including, but not limited to, Excel spreadsheets in live format with all formulas intact.
- d. Describe how the Company addressed the effects of Covid-19 on the revenues in fiscal years 2020, 2021, 2022, and 2023 in the development of its budget revenues for fiscal years 2021, 2022, and/or the forecast months included in the base period and test year in this proceeding. Specifically describe how the Company normalized or excluded data from the historic periods in its trend analysis and how it reflected a return to "normal" in the forecast periods.
- e. Provide a copy of all correspondence, including, but not limited to, emails, notes, studies, analyses, and other writings that address how the Company reflected the effects of Covid-19 in its budget revenues for fiscal years 2021, 2022, and/or the forecast months included in the base period and test year in this proceeding.
- f. Provide all electronic workpapers in Excel live format and with all formulas intact that have not yet been provided in the Company's filing or in response to Staff discovery.

**RESPONSE:**

- a. The Company believes the question calls for speculation with regards to the phrase "effects of Covid-19." There could be a broad spectrum of "effects" and differing opinions about their impact. Notwithstanding this uncertainty, the Company came to the conclusion that the revenue impact was mostly offsetting. Please see the Company's response to Staff DR No. 2-22.
- b. The Company believes the question calls for speculation with regards to the phrase "effects of Covid-19" Because of the undefined and unlimited scope of the question, the Company cannot specifically respond.
- c. The Company performs a detailed comprehensive review of margins on a monthly basis for actual versus budget as well as year over year variances. Any effects of Covid-19 would be contained within those variances. In particular, the year over year variance related to consumption adjusted for the impact of weather normalization (WNA) would be potentially influenced by any impacts to customer usage related to Covid-19. Please see Attachment 1 for the monthly results of that analysis for weather sensitive customers. The results for the twelve month period ended March 2021 is (\$1,267) with only minor impacts within any particular month or customer class.

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-31**  
**Page 2 of 2**

- d. The question calls for speculation with regards to the phrase "effects of Covid-19." Notwithstanding this objection, the Company states that it did not normalize data to address the effects of Covid-19 for budgeting purposes, instead it disregarded data from after March 2020 for budgeting purposes. The Company would also note that budgeting is fundamentally different than cost-of-service ratemaking.
- e. The question calls for speculation with regards to the phrase "effects of Covid-19." There is no correspondence responsive to this request.
- f. All such documents have already been provided.

**ATTACHMENTS:**

ATTACHMENT 1 - AG\_1-31\_Att1 - KY Weather Net of WNA Res-Comm-PA Margin Impact TME 3-31-2021.xlsx, 1 Page.

Respondent: Josh Densman

**Kentucky Service Area**  
**Distribution Margin Analysis for Residential, Commercial and Public Authority**  
**Weather and Consumption (net of WNA)**  
**12 Months Ended March 31, 2021 Variance v. PY**

<b>Class</b>	<b>Apr-20</b>	<b>May-20</b>	<b>Jun-20</b>	<b>Jul-20</b>	<b>Aug-20</b>	<b>Sep-20</b>	<b>Oct-20</b>	<b>Nov-20</b>	<b>Dec-20</b>	<b>Jan-21</b>	<b>Feb-21</b>	<b>Mar-21</b>	<b>Total</b>
Residential	125,266	8,903	54,037	41,536	(16,509)	45,569	63,131	(11,810)	(55,049)	(101,250)	(131,516)	168,127	190,434
Commercial	(57,874)	(101,790)	(29,148)	(1,219)	(36,755)	14,565	116,345	(65,844)	(50,625)	24,785	(103,577)	136,398	(154,741)
Public Authority	20,030	(18,533)	2,669	(559)	(18,195)	(6,156)	6,830	(8,143)	(8,150)	(12,575)	(15,418)	21,242	(36,960)
<i>Weather &amp; Consumption (net of WNA)</i>	87,422	(111,421)	27,557	39,757	(71,459)	53,978	186,305	(85,797)	(113,825)	(89,041)	(250,511)	325,768	(1,267)

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-32**  
**Page 1 of 2**

**REQUEST:**

In regards to PHMSA inspection expenses, respond to the following questions:

- a. Provide the PHMSA inspection expense incurred in each year 2018 through 2020, budgeted for 2021, the base year, and the test year by FERC O&M expense account/subaccount separated into one-time (baseline) inspection expenses and ongoing inspection expenses and in total for each category for each year. Provide a ten-year forecast of one-time (baseline) and ongoing inspection expenses by year from 2022 through 2031 by FERC O&M expense account/subaccount and in total for each category by year.
- b. Confirm that the Company agrees certain of the PHMSA inspection expenses were and are being incurred to establish a baseline for inspection, correction, and reporting purposes. Identify and describe each category of these expenses.
- c. Confirm that the Company agrees that certain of the PHMSA inspection expenses are ongoing, but periodic. Identify and describe each category of these expenses. To the extent possible, describe the frequency required for each major type of PHMSA inspections.
- d. Provide the integrity management expenses, including the PHMSA inspection expenses, incurred in each year 2018 through 2020, budgeted for 2021, the base year, and the test year by FERC O&M expense account/subaccount separated into one-time (baseline) integrity management expenses and ongoing integrity management expenses and in total for each category for each year. Provide a ten-year forecast of one-time (baseline) and ongoing integrity management expenses by year from 2022 through 2031 by FERC O&M expense account/subaccount and in total for each category by year.
- e. Confirm that the Company agrees certain of the integrity management expenses were and are being incurred to establish a baseline for inspection, correction, and reporting purposes. Identify and describe each category of these expenses.
- f. Confirm that the Company agrees that certain of the integrity management expenses are ongoing, but periodic. Identify and describe each category of these expenses. To the extent possible, describe the frequency required for each major type of PHMSA inspections.

**RESPONSE:**

- a. Please see the table below with the Atmos Energy Kentucky PHMSA inspection expenses for 2018-2020. The costs shown below can all be categorized as ongoing PHMSA inspection expenses.

<b>FY18</b>	<b>FY19</b>	<b>FY20</b>
<b>\$ 563</b>	<b>\$ 10,596</b>	<b>\$ 26,252</b>

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-32**  
**Page 2 of 2**

Atmos Energy Kentucky is budgeted to have \$87,000 of PHMSA inspection expense in 2021. Please see below a summary of our anticipated PHMSA inspection expenses over the next 10 years. The timing of this spend is subject to change based on operational planning. The charges shown below show a steady spend spread over the 10 years. In reality, these charges may occur with more spend weighted in certain years based on the operational planning.

<b>FY22</b>	<b>FY23</b>	<b>FY24</b>	<b>FY25</b>	<b>FY26</b>	<b>FY27</b>	<b>FY28</b>	<b>FY29</b>	<b>FY30</b>	<b>FY31</b>	<b>Total</b>
<b>\$ 60,000</b>	<b>\$ 61,800</b>	<b>\$ 63,654</b>	<b>\$ 65,564</b>	<b>\$ 67,531</b>	<b>\$ 69,556</b>	<b>\$ 71,643</b>	<b>\$ 73,792</b>	<b>\$ 76,006</b>	<b>\$ 78,286</b>	<b>\$ 687,833</b>

- b. The Company agrees that certain of the PHMSA inspection expenses were and are being incurred to establish a baseline for inspection, correction, and reporting purposes.

Atmos Energy performs both Internal Corrosion Direct Assessment, and External Corrosion Direct Assessment. These expenses are charged to Project No. 050.19021 (3444 KY Pipeline Integrity Direct Assessment). All expenses for this work are charged to this project including pre-assessment field work, the costs for conducting the assessments, and costs related to completing the final reports for each assessment.

Atmos Energy Kentucky has no remaining High Consequence Areas along its Transmission lines. Therefore, all assessments in the next 10 years will be for the new mileage required to be assessed under 192.710 from the recent rulemaking. All of the upcoming inspections will be baseline inspection.

- c. The Company agrees that certain of the PHMSA inspection expenses are ongoing, but periodic.

Please see the response above listing the categories of these expenses related to PHMSA inspections.

Atmos Energy Corporation performs their inspections for required Transmission lines using the intervals listed in CFR Part 192. Segments deemed to be High Consequence Area's are inspected using a 7-year interval. Segments covered by the new rulemaking under 192.710 will be inspected using a 10-year interval.

- d. Please see the Company's response to subparts (a) thru (c).
- e. Please see the Company's response to subparts (a) thru (c).
- f. Please see the Company's response to subparts (a) thru (c).

Respondent: Joe Christian



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-33**  
**Page 1 of 1**

**REQUEST:**

Provide a schedule showing the total costs incurred by the Shared Services Divisions (Divisions 002 and 012) by cost allocation pool and the amounts charged to each affiliate, sub affiliate, or division by FERC O&M and A&G expense account for the fiscal year ended September 30, 2020. Be sure to separate out the costs allocated via each of the different allocation factors including, but not limited to, the Composite Allocation Factor. Provide the information in electronic format with all formulas intact.

**RESPONSE:**

Please see Attachment 1.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-33\_Att1 - SSU O&M Allocated to Business Units FY20.xlsx, 10 Pages.

Respondent: Michelle Faulk





Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Business Units  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001	Sub 40002	Sub 40003	Sub 40004	Sub 40008	Sub 40009	Sub 40010	Sub 40011	Sub 40012	Sub 40014	Sub 40015	Sub 40017	Total SSU Allocated to Business Units
						Billed to West Tex Div	Billed to CO/KS Div	Billed to LA Div	Billed to KY-MidSt Div	Billed to Mid-Tex Div	Billed to MS Div	Billed to Pipeline Div	Billed to AELIG	Billed to WKGS	Billed to UCGS	Billed to TLGP	Billed to AP&S	
1130	ATM-Dal-Busi Planning & Analysis	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,418,953)		(116,496)	(93,367)	(127,422)	(114,875)	(584,626)	(101,455)	(245,195)	(1,277)	(995)	(588)	(2,895)	(1,418,953)
1130	ATM-Dal-Busi Planning & Analysis		8700	Distribution-Operation supervision and engineering	838													
1130	ATM-Dal-Busi Planning & Analysis		9200	A&G-Administrative & general salaries	945,599													
1130	ATM-Dal-Busi Planning & Analysis		9210	A&G-Office supplies & expense	97,409													
1130	ATM-Dal-Busi Planning & Analysis		9260	A&G-Employee pensions and benefits	375,107													
1130 Total					(0)													
1131	ATM-Dallas Media Relations	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(29,333)	(2,411)	(1,939)	(2,646)	(3,007)	(12,124)	(2,106)	(5,101)						(29,333)
1131	ATM-Dallas Media Relations		9210	A&G-Office supplies & expense	29,333													
1131 Total					0													
1132	ATM-Dal-Investor Relations	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(664,866)	(54,585)	(43,748)	(59,705)	(67,883)	(273,925)	(47,538)	(114,889)	(598)	(465)	(266)	(1,263)		(664,866)
1132	ATM-Dal-Investor Relations		8700	Distribution-Operation supervision and engineering	150													
1132	ATM-Dal-Investor Relations		9200	A&G-Administrative & general salaries	228,301													
1132	ATM-Dal-Investor Relations		9210	A&G-Office supplies & expense	205,273													
1132	ATM-Dal-Investor Relations		9260	A&G-Employee pensions and benefits	(97,836)													
1132	ATM-Dal-Investor Relations		9302	Miscellaneous general expenses	328,972													
1132 Total					0													
1133	ATM-Dal-Corporate Communications	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(2,010,762)	(165,084)	(132,308)	(180,596)	(205,299)	(828,434)	(143,769)	(341,460)	(1,810)	(1,408)	(804)	(3,820)		(2,010,762)
1133	ATM-Dal-Corporate Communications		9120	Sales-Demonstrating and selling expenses	105,849													
1133	ATM-Dal-Corporate Communications		9200	A&G-Administrative & general salaries	936,575													
1133	ATM-Dal-Corporate Communications		9210	A&G-Office supplies & expense	534,985													
1133	ATM-Dal-Corporate Communications		9230	A&G-Outside services employed	99,646													
1133	ATM-Dal-Corporate Communications		9260	A&G-Employee pensions and benefits	326,611													
1133	ATM-Dal-Corporate Communications		9320	A&G-Maintenance of general plant	7,087													
1133 Total					0													
1134	ATM-Dal-IT	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(2,703,428)	(221,951)	(177,866)	(242,766)	(276,026)	(1,113,612)	(193,295)	(467,152)	(2,433)	(1,892)	(1,081)	(5,137)		(2,703,428)
1134	ATM-Dal-IT		9200	A&G-Administrative & general salaries	1,492,229													
1134	ATM-Dal-IT		9210	A&G-Office supplies & expense	181,955													
1134	ATM-Dal-IT		9260	A&G-Employee pensions and benefits	1,029,196													
1134	ATM-Dal-IT		9320	A&G-Maintenance of general plant	49													
1134 Total					(0)													
1135	ATM-Dal-IT E&O Corporate Systems	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(10,749,324)	(882,520)	(707,306)	(965,288)	(1,097,506)	(4,428,722)	(768,577)	(1,857,483)	(6,674)	(7,525)	(4,300)	(20,424)		(10,749,324)
1135	ATM-Dal-IT E&O Corporate Systems		9200	A&G-Administrative & general salaries	2,246,007													
1135	ATM-Dal-IT E&O Corporate Systems		9210	A&G-Office supplies & expense	7,657,880													
1135	ATM-Dal-IT E&O Corporate Systems		9230	A&G-Outside services employed	34,352													
1135	ATM-Dal-IT E&O Corporate Systems		9260	A&G-Employee pensions and benefits	795,424													
1135	ATM-Dal-IT E&O Corporate Systems		9302	Miscellaneous general expenses	12,301													
1135	ATM-Dal-IT E&O Corporate Systems		9320	A&G-Maintenance of general plant	3,359													
1135 Total					(0)													
1137	ATM-Dal-IT Engineering & Operations	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(19,866,301)	(1,631,023)	(1,307,203)	(1,783,994)	(2,028,349)	(6,164,918)	(1,420,441)	(3,432,897)	(17,880)	(13,906)	(7,947)	(37,746)		(19,866,301)
1137	ATM-Dal-IT Engineering & Operations		9200	A&G-Administrative & general salaries	3,724,697													
1137	ATM-Dal-IT Engineering & Operations		9210	A&G-Office supplies & expense	13,444,631													
1137	ATM-Dal-IT Engineering & Operations		9230	A&G-Outside services employed	1,435,044													
1137	ATM-Dal-IT Engineering & Operations		9260	A&G-Employee pensions and benefits	1,219,466													
1137	ATM-Dal-IT Engineering & Operations		9310	A&G-Rents	3,174													
1137	ATM-Dal-IT Engineering & Operations		9320	A&G-Maintenance of general plant	39,290													
1137 Total					(0)													
1141	ATM-Dal-Gas Purchase Acctg	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(630,507)	(63,114)	(50,441)	(68,725)	(79,255)	(313,362)	(55,611)							(630,507)
1141	ATM-Dal-Gas Purchase Acctg		9200	A&G-Administrative & general salaries	472,902													
1141	ATM-Dal-Gas Purchase Acctg		9210	A&G-Office supplies & expense	2,776													
1141	ATM-Dal-Gas Purchase Acctg		9260	A&G-Employee pensions and benefits	154,828													
1141 Total					(0)													
1144	ATM-Dal-Gas Acctg Systems & Rate Admin	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(807,849)	(80,868)	(64,828)	(88,056)	(101,547)	(401,501)	(71,252)							(807,849)
1144	ATM-Dal-Gas Acctg Systems & Rate Admin		9200	A&G-Administrative & general salaries	605,573													
1144	ATM-Dal-Gas Acctg Systems & Rate Admin		9210	A&G-Office supplies & expense	3,766													
1144	ATM-Dal-Gas Acctg Systems & Rate Admin		9260	A&G-Employee pensions and benefits	198,265													
1144	ATM-Dal-Gas Acctg Systems & Rate Admin		9320	A&G-Maintenance of general plant	246													
1144 Total					0													
1145	ATM-Dal-Revenue Accounting	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(421,190)	(42,161)	(33,695)	(45,910)	(52,944)	(209,331)	(37,149)							(421,190)
1145	ATM-Dal-Revenue Accounting		9200	A&G-Administrative & general salaries	293,862													
1145	ATM-Dal-Revenue Accounting		9210	A&G-Office supplies & expense	5,737													
1145	ATM-Dal-Revenue Accounting		9260	A&G-Employee pensions and benefits	121,591													
1145 Total					(0)													
1146	ATM-Dallas IT Enterprise Solutions	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(513,375)	(42,148)	(33,780)	(46,101)	(52,416)	(211,510)	(36,706)	(88,711)	(462)	(359)	(205)	(975)		(513,375)
1146	ATM-Dallas IT Enterprise Solutions		9210	A&G-Office supplies & expense	513,375													
1146 Total					0													

Sub 40001 Sub 40002 Sub 40003 Sub 40004 Sub 40008 Sub 40009 Sub 40010 Sub 40011 Sub 40012 Sub 40014 Sub 40015 Sub 40017 Total SSU Allocated to Business Units



Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Business Units  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units
1205	ATM-Dal Executive Vice President	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	140,856		(11,564)	(9,256)	(12,949)	(14,381)	(58,033)	(10,071)	(24,340)	(127)	(99)	(56)	(268)	(140,856)
1205	ATM-Dal Executive Vice President		9200	A&G-Administrative & general salaries	66,882													
1205	ATM-Dal Executive Vice President		9210	A&G-Office supplies & expense	52,077													
1205	ATM-Dal Executive Vice President		9260	A&G-Employee pensions and benefits	21,897													
1205 Total					(0)													

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units
1209	ATM-Dal-Security & Compliance	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(1,271,059)		(104,477)	(84,014)	(114,643)	(130,276)	(523,308)	(91,258)	(221,029)					(1,271,059)
1209	ATM-Dal-Security & Compliance		8700	Distribution-Operation supervision and engineering	53													
1209	ATM-Dal-Security & Compliance		9200	A&G-Administrative & general salaries	726,165													
1209	ATM-Dal-Security & Compliance		9210	A&G-Office supplies & expense	209,053													
1209	ATM-Dal-Security & Compliance		9230	A&G-Outside services employed	555													
1209	ATM-Dal-Security & Compliance		9250	A&G-Injuries & damages	55,382													
1209	ATM-Dal-Security & Compliance		9260	A&G-Employee pensions and benefits	271,423													
1209	ATM-Dal-Security & Compliance		9320	A&G-Maintenance of general plant	6,339													
1209 Total					(0)													

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units
1212	ATM-CSO-Customer Contact Center	Customer	9220	A&G-Administrative expense transferred-Credit	(23,223,494)		(2,229,455)	(1,855,748)	(2,565,518)	(2,552,262)	(12,178,400)	(1,839,110)						(23,223,494)
1212	ATM-CSO-Customer Contact Center		8740	Mains and Services Expenses	8,398													
1212	ATM-CSO-Customer Contact Center		9010	Customer accounts-Operation supervision	2,712,999													
1212	ATM-CSO-Customer Contact Center		9030	Customer accounts-Customer records and collections expenses	13,089,721													
1212	ATM-CSO-Customer Contact Center		9200	A&G-Administrative & general salaries	(13,834)													
1212	ATM-CSO-Customer Contact Center		9210	A&G-Office supplies & expense	1,917,473													
1212	ATM-CSO-Customer Contact Center		9230	A&G-Outside services employed	26,720													
1212	ATM-CSO-Customer Contact Center		9260	A&G-Employee pensions and benefits	5,190,011													
1212	ATM-CSO-Customer Contact Center		9310	A&G-Rents	292,005													
1212 Total					0													

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units
1215	ATM-Dal-Dispatch Operations	Customer	9220	A&G-Administrative expense transferred-Credit	(6,816,970)		(654,429)	(553,538)	(753,957)	(749,185)	(3,574,819)	(531,042)						(6,816,970)
1215	ATM-Dal-Dispatch Operations		8740	Mains and Services Expenses	76,253													
1215	ATM-Dal-Dispatch Operations		8750	Distribution-Measuring and regulating station expenses	87													
1215	ATM-Dal-Dispatch Operations		9010	Customer accounts-Operation supervision	777,549													
1215	ATM-Dal-Dispatch Operations		9030	Customer accounts-Customer records and collections expenses	4,109,860													
1215	ATM-Dal-Dispatch Operations		9200	A&G-Administrative & general salaries	71,499													
1215	ATM-Dal-Dispatch Operations		9210	A&G-Office supplies & expense	89,452													
1215	ATM-Dal-Dispatch Operations		9260	A&G-Employee pensions and benefits	1,686,274													
1215	ATM-Dal-Dispatch Operations		9310	A&G-Rents	5,998													
1215 Total					(0)													

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units
1216	ATM-Dallas Training Quality & Innovation	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(544,008)		(44,663)	(35,796)	(48,852)	(55,543)	(224,131)	(94,005)	(490)	(381)	(218)	(1,034)		(544,008)
1216	ATM-Dallas Training Quality & Innovation		9200	A&G-Administrative & general salaries	401,092													
1216	ATM-Dallas Training Quality & Innovation		9210	A&G-Office supplies & expense	10,395													
1216	ATM-Dallas Training Quality & Innovation		9260	A&G-Employee pensions and benefits	131,318													
1216	ATM-Dallas Training Quality & Innovation		9320	A&G-Maintenance of general plant	1,204													
1216 Total					(0)													

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units
1221	ATM-Dal Pipeline Admin	AELIG, WKGS, UCGS, TLGP, MS and LA	9220	A&G-Administrative expense transferred-Credit	(378,121)			(155,899)			(18,906)		(129,998)	(2,382)	(2,382)	(67,759)	(794)	(378,121)
1221	ATM-Dal Pipeline Admin		9200	A&G-Administrative & general salaries	213,665													
1221	ATM-Dal Pipeline Admin		9210	A&G-Office supplies & expense	5,585													
1221	ATM-Dal Pipeline Admin		9260	A&G-Employee pensions and benefits	158,362													
1221	ATM-Dal Pipeline Admin		9320	A&G-Maintenance of general plant	509													
1221 Total					(0)													

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units
1224	ATM-Dal-CSO Human Resources	Customer	9220	A&G-Administrative expense transferred-Credit	(174,623)		(74,354)	(62,900)	(85,674)	(65,132)	(406,215)	(60,344)						(174,623)
1224	ATM-Dal-CSO Human Resources		9030	Customer accounts-Customer records and collections expenses	287,015													
1224	ATM-Dal-CSO Human Resources		9200	A&G-Administrative & general salaries	290,799													
1224	ATM-Dal-CSO Human Resources		9210	A&G-Office supplies & expense	9,572													
1224	ATM-Dal-CSO Human Resources		9260	A&G-Employee pensions and benefits	186,417													
1224	ATM-Dal-CSO Human Resources		9320	A&G-Maintenance of general plant	825													
1224 Total					(0)													

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units
1226	ATM-Dal-Customer Service	Customer	9220	A&G-Administrative expense transferred-Credit	(3,258,312)		(312,798)	(264,575)	(360,369)	(358,089)	(1,708,859)	(253,823)						(3,258,312)
1226	ATM-Dal-Customer Service		9010	Customer accounts-Operation supervision	178													
1226	ATM-Dal-Customer Service		9030	Customer accounts-Customer records and collections expenses	613,834													
1226	ATM-Dal-Customer Service		9200	A&G-Administrative & general salaries	807,913													
1226	ATM-Dal-Customer Service		9210	A&G-Office supplies & expense	337,059													
1226	ATM-Dal-Customer Service		9260	A&G-Employee pensions and benefits	608,783													
1226	ATM-Dal-Customer Service		9310	A&G-Rents	889,302													
1226	ATM-Dal-Customer Service		9320	A&G-Maintenance of general plant	1,204													
1226 Total					0													

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S</
-------------	-------------------------	-------------	---------	---------------------	-------------	-------------------------------------	----------------------------------	-------------------------------	-------------------------------------	------------------------------------	-------------------------------	-------------------------------------	------------------------------	-----------------------------	-----------------------------	-----------------------------	-------------------------------



Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Business Units  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units	
1414	ATM-Dal-Tech Training Delivery	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(2,938,422)														
1414	ATM-Dal-Tech Training Delivery		8700	Distribution-Operation supervision and engineering	2,115	(241,374)	(194,058)	(284,985)	(300,983)	(1,213,623)	(210,835)	(910,644)							(2,938,422)
1414	ATM-Dal-Tech Training Delivery		8740	Mains and Services Expenses	59,674														
1414	ATM-Dal-Tech Training Delivery		9200	A&G-Administrative & general salaries	1,418,616														
1414	ATM-Dal-Tech Training Delivery		9210	A&G-Office supplies & expense	960,961														
1414	ATM-Dal-Tech Training Delivery		9260	A&G-Employee pensions and benefits	464,455														
1414	ATM-Dal-Tech Training Delivery		9310	A&G-Rents	30,602														
1414 Total					0														
1415	ATM-Dal-Tech Trng Prog & Curriculum	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(179,753)														
1415	ATM-Dal-Tech Trng Prog & Curriculum		9200	A&G-Administrative & general salaries	(571,506)	(65,742)	(52,866)	(72,141)	(61,978)	(330,561)	(57,425)	(139,083)							(799,753)
1415	ATM-Dal-Tech Trng Prog & Curriculum		9210	A&G-Office supplies & expense	24,884														
1415	ATM-Dal-Tech Trng Prog & Curriculum		9230	A&G-Outside services employed	(1,745)														
1415	ATM-Dal-Tech Trng Prog & Curriculum		9260	A&G-Employee pensions and benefits	187,111														
1415	ATM-Dal-Tech Trng Prog & Curriculum		9320	A&G-Maintenance of general plant	18,030														
1415 Total					0														
1416	ATM-Dal-Compensation & HRMS	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,402,668)														
1416	ATM-Dal-Compensation & HRMS		9200	A&G-Administrative & general salaries	934,360	(115,159)	(92,296)	(125,960)	(143,212)	(577,899)	(100,291)	(242,381)	(1,262)	(982)	(561)	(2,665)			(1,402,668)
1416	ATM-Dal-Compensation & HRMS		9210	A&G-Office supplies & expense	17,047														
1416	ATM-Dal-Compensation & HRMS		9230	A&G-Outside services employed	118,963														
1416	ATM-Dal-Compensation & HRMS		9260	A&G-Employee pensions and benefits	332,248														
1416	ATM-Dal-Compensation & HRMS		9320	A&G-Maintenance of general plant	149														
1416 Total					0														
1417	ATM-Dal Corporate Programs	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(347,404)														
1417	ATM-Dal Corporate Programs		8700	Distribution-Operation supervision and engineering	3,356	(28,522)	(22,859)	(31,197)	(35,470)	(143,130)	(24,839)	(60,031)	(313)	(243)	(139)	(660)			(347,404)
1417	ATM-Dal Corporate Programs		9030	Customer accounts-Customer records and collections expenses	16														
1417	ATM-Dal Corporate Programs		9110	Sales-Supervision	874														
1417	ATM-Dal Corporate Programs		9200	A&G-Administrative & general salaries	115,102														
1417	ATM-Dal Corporate Programs		9210	A&G-Office supplies & expense	190,373														
1417	ATM-Dal Corporate Programs		9260	A&G-Employee pensions and benefits	37,684														
1417 Total					0														
1420	ATM-Dallas EAPC	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(423,129)														
1420	ATM-Dallas EAPC		8700	Distribution-Operation supervision and engineering	1,493	(34,739)	(27,842)	(37,997)	(43,202)	(174,329)	(30,254)	(73,117)	(381)	(296)	(169)	(804)			(423,129)
1420	ATM-Dallas EAPC		8740	Mains and Services Expenses	1,896														
1420	ATM-Dallas EAPC		9010	Customer accounts-Operation supervision	750														
1420	ATM-Dallas EAPC		9030	Customer accounts-Customer records and collections expenses	203														
1420	ATM-Dallas EAPC		9210	A&G-Office supplies & expense	69,362														
1420	ATM-Dallas EAPC		9230	A&G-Outside services employed	349,426														
1420 Total					0														
1463	ATM-HR Benefit Variance	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,542,263)														
1463	ATM-HR Benefit Variance		9260	A&G-Employee pensions and benefits	(1,542,263)	126,620	101,481	138,495	157,465	635,412	110,272	268,503	1,388	1,080	617	2,930			1,542,263
1463 Total					0														
1501	ATM-Dal-Legal	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(7,226,792)														
1501	ATM-Dal-Legal		8700	Distribution-Operation supervision and engineering	194	(593,320)	(475,523)	(648,966)	(737,855)	(2,977,438)	(516,716)	(1,248,790)	(6,504)	(5,059)	(2,891)	(13,731)			(7,226,792)
1501	ATM-Dal-Legal		9200	A&G-Administrative & general salaries	3,818,038														
1501	ATM-Dal-Legal		9210	A&G-Office supplies & expense	105,298														
1501	ATM-Dal-Legal		9230	A&G-Outside services employed	727,462														
1501	ATM-Dal-Legal		9260	A&G-Employee pensions and benefits	2,313,190														
1501	ATM-Dal-Legal		9302	Miscellaneous general expenses	257,971														
1501	ATM-Dal-Legal		9320	A&G-Maintenance of general plant	4,640														
1501 Total					0														
1502	ATM-Corporate Secretary	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,720,092)														
1502	ATM-Corporate Secretary		9210	A&G-Office supplies & expense	4,724	(141,220)	(113,182)	(154,464)	(175,621)	(708,678)	(122,987)	(297,232)	(1,548)	(1,204)	(688)	(3,268)			(1,720,092)
1502	ATM-Corporate Secretary		9302	Miscellaneous general expenses	1,715,369														
1502 Total					0														
1503	ATM-Dal-Governmental Affairs	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(768,665)														
1503	ATM-Dal-Governmental Affairs		8700	Distribution-Operation supervision and engineering	99	(63,184)	(50,809)	(69,334)	(78,788)	(317,689)	(55,190)	(133,671)							(768,665)
1503	ATM-Dal-Governmental Affairs		9200	A&G-Administrative & general salaries	375,956														
1503	ATM-Dal-Governmental Affairs		9210	A&G-Office supplies & expense	86,574														
1503	ATM-Dal-Governmental Affairs		9260	A&G-Employee pensions and benefits	305,916														
1503	ATM-Dal-Governmental Affairs		9320	A&G-Maintenance of general plant	118														
1503 Total					0														
1504	ATM-Dal-Central Records	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(594,391)														
1504	ATM-Dal-Central Records		9200	A&G-Administrative & general salaries	263,105	(48,859)	(39,289)	(53,614)	(60,925)	(245,662)	(42,677)	(103,365)							(594,391)
1504	ATM-Dal-Central Records		9210	A&G-Office supplies & expense	65,038														
1504	ATM-Dal-Central Records		9230	A&G-Outside services employed	1,298														
1504	ATM-Dal-Central Records		9260	A&G-Employee pensions and benefits	86,140														
1504	ATM-Dal-Central Records		9302	Miscellaneous general expenses	35,420														
1504	ATM-Dal-Central Records		9320	A&G-Maintenance of general plant	143,390														
1504 Total					0														

Sub 40001 Sub 40002 Sub 40003 Sub 40004 Sub 40008 Sub 40009 Sub 40010 Sub 40011 Sub 40012 Sub 40014 Sub 40015 Sub 40017 Total SSU Allocated to Business Units



Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Business Units  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units
1508	ATM-Dal-Energy Assistance	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(61,213)													
1508	ATM-Dal-Energy Assistance		9200	A&G-Administrative & general salaries	391,428	(66,187)	(52,897)	(72,072)	(83,115)	(328,623)	(58,319)							(661,213)
1508	ATM-Dal-Energy Assistance		9210	A&G-Office supplies & expense	45,461													
1508	ATM-Dal-Energy Assistance		9230	A&G-Outside services employed	96,172													
1508	ATM-Dal-Energy Assistance		9260	A&G-Employee pensions and benefits	128,152													
1508	Total																	
1821	ATM-Dal-Gas Supply Executive	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(788,206)													
1821	ATM-Dal-Gas Supply Executive		9200	A&G-Administrative & general salaries	264,034	(64,791)	(52,022)	(70,939)	(80,633)	(325,293)	(56,436)	(136,596)						(788,206)
1821	ATM-Dal-Gas Supply Executive		9210	A&G-Office supplies & expense	79,109													
1821	ATM-Dal-Gas Supply Executive		9230	A&G-Outside services employed	118,310													
1821	ATM-Dal-Gas Supply Executive		9260	A&G-Employee pensions and benefits	171,820													
1821	ATM-Dal-Gas Supply Executive		9320	A&G-Maintenance of general plant	154,863													
1821	ATM-Dal-Gas Supply Executive				953													
1821	Total				(9)													
1822	ATM-Dal-Regional Gas Supply	Composite - WTX and MIX	9220	A&G-Administrative expense transferred-Credit	(321,481)													
1822	ATM-Dal-Regional Gas Supply		9200	A&G-Administrative & general salaries	217,257	(64,198)				(267,263)								(321,481)
1822	ATM-Dal-Regional Gas Supply		9210	A&G-Office supplies & expense	9,590													
1822	ATM-Dal-Regional Gas Supply		9260	A&G-Employee pensions and benefits	94,814													
1822	Total																	
1823	ATM-Dal-Gas Contract Admin	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(423,122)													
1823	ATM-Dal-Gas Contract Admin		9200	A&G-Administrative & general salaries	296,554	(42,355)	(33,850)	(46,120)	(53,186)	(210,292)	(37,319)							(423,122)
1823	ATM-Dal-Gas Contract Admin		9210	A&G-Office supplies & expense	5,992													
1823	ATM-Dal-Gas Contract Admin		9260	A&G-Employee pensions and benefits	120,576													
1823	Total				0													
1825	ATM-Franklin-Gas Control & Storage	Composite - Atmos 5 and TLGP	9220	A&G-Administrative expense transferred-Credit	(522,010)													
1825	ATM-Franklin-Gas Control & Storage		9200	A&G-Administrative & general salaries	343,605	(103,306)	(82,425)	(113,119)	(130,189)		(90,360)					(2,610)		(522,010)
1825	ATM-Franklin-Gas Control & Storage		9210	A&G-Office supplies & expense	20,298													
1825	ATM-Franklin-Gas Control & Storage		9260	A&G-Employee pensions and benefits	158,107													
1825	Total																	
1826	ATM-New Orleans-Gas Supply & Services	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(513,200)													
1826	ATM-New Orleans-Gas Supply & Services		9200	A&G-Administrative & general salaries	167	(51,371)	(41,056)	(55,039)	(64,509)	(255,060)	(45,264)							(513,200)
1826	ATM-New Orleans-Gas Supply & Services		9210	A&G-Office supplies & expense	228,119													
1826	ATM-New Orleans-Gas Supply & Services		9230	A&G-Outside services employed	82,000													
1826	ATM-New Orleans-Gas Supply & Services		9260	A&G-Employee pensions and benefits	112,431													
1826	Total				0													
1827	ATM-Regional Supply Planning	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(810,643)													
1827	ATM-Regional Supply Planning		9200	A&G-Administrative & general salaries	467,158	(81,145)	(64,851)	(88,360)	(101,898)	(402,890)	(71,499)							(810,643)
1827	ATM-Regional Supply Planning		9210	A&G-Office supplies & expense	181,612													
1827	ATM-Regional Supply Planning		9230	A&G-Outside services employed	18,315													
1827	ATM-Regional Supply Planning		9260	A&G-Employee pensions and benefits	143,231													
1827	ATM-Regional Supply Planning		9320	A&G-Maintenance of general plant	327													
1827	Total				(9)													
1828	ATM-Jackson-West Region Gas Supply & Services	Composite - CO, KS, LA, MS	9220	A&G-Administrative expense transferred-Credit	(549,506)													
1828	ATM-Jackson-West Region Gas Supply & Services		9200	A&G-Administrative & general salaries	391,299		(158,012)	(217,074)			(173,620)							(549,506)
1828	ATM-Jackson-West Region Gas Supply & Services		9210	A&G-Office supplies & expense	6,089													
1828	ATM-Jackson-West Region Gas Supply & Services		9260	A&G-Employee pensions and benefits	151,596													
1828	ATM-Jackson-West Region Gas Supply & Services		9320	A&G-Maintenance of general plant	622													
1828	Total				(9)													
1829	ATM-Franklin-East Region Gas Supply & Services	KY-Mid-States Only	9220	A&G-Administrative expense transferred-Credit	(26,149)													
1829	ATM-Franklin-East Region Gas Supply & Services		9200	A&G-Administrative & general salaries	26													
1829	ATM-Franklin-East Region Gas Supply & Services		9210	A&G-Office supplies & expense	(63)													
1829	ATM-Franklin-East Region Gas Supply & Services		9230	A&G-Outside services employed	25,247													
1829	ATM-Franklin-East Region Gas Supply & Services		9260	A&G-Employee pensions and benefits	(21)													
1829	ATM-Franklin-East Region Gas Supply & Services		9320	A&G-Maintenance of general plant	960													
1829	Total				0													
1831	ATM-Dal-Gas Supply	Mid-Tex Only	9220	A&G-Administrative expense transferred-Credit	(900,874)													
1831	ATM-Dal-Gas Supply		9200	A&G-Administrative & general salaries	653,698					(900,874)								(900,874)
1831	ATM-Dal-Gas Supply		9210	A&G-Office supplies & expense	32,679													
1831	ATM-Dal-Gas Supply		9260	A&G-Employee pensions and benefits	214,021													
1831	ATM-Dal-Gas Supply		9320	A&G-Maintenance of general plant	477													
1831	Total				0													
1833	ATM-Corporate Gas Supply Risk Mgmt	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(508,145)													
1833	ATM-Corporate Gas Supply Risk Mgmt		9200	A&G-Administrative & general salaries	325,756	(50,895)	(40,652)	(55,388)	(63,874)	(252,548)	(44,818)							(508,145)
1833	ATM-Corporate Gas Supply Risk Mgmt		9210	A&G-Office supplies & expense	40,667													
1833	ATM-Corporate Gas Supply Risk Mgmt		9230	A&G-Outside services employed	6,700													
1833	ATM-Corporate Gas Supply Risk Mgmt		9260	A&G-Employee pensions and benefits	135,022													
1833	Total																	

Sub 40001 Sub 40002 Sub 40003 Sub 40004 Sub 40008 Sub 40009 Sub 40010 Sub 40011 Sub 40012 Sub 40014 Sub 40015 Sub 40017 Total SSU Allocated to Business Units

Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Business Units  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Sub 40001 Billed to West Tex Div	Sub 40002 Billed to CO/KS Div	Sub 40003 Billed to LA Div	Sub 40004 Billed to KY-MidSt Div	Sub 40008 Billed to Mid-Tex Div	Sub 40009 Billed to MS Div	Sub 40010 Billed to Pipeline Div	Sub 40011 Billed to AELIG	Sub 40012 Billed to WKGS	Sub 40014 Billed to UCGS	Sub 40015 Billed to TLGP	Sub 40017 Billed to AP&S	Total SSU Allocated to Business Units	
1835	ATM-Franklin-Gas Control	Composite - Atmos 5 and TLGP	9220	A&G-Administrative expense transferred-Credit	(1,563,318)		(309,380)	(246,848)	(338,771)	(389,891)	(270,810)							(7,817)	(1,563,318)
1835	ATM-Franklin-Gas Control		9200	A&G-Administrative & general salaries	937,910														
1835	ATM-Franklin-Gas Control		9210	A&G-Office supplies & expense	115,573														
1835	ATM-Franklin-Gas Control		9220	A&G-Outside services employed	111,957														
1835	ATM-Franklin-Gas Control		9260	A&G-Employee pensions and benefits	307,047														
1835	ATM-Franklin-Gas Control		9310	A&G-Rents	88,768														
1835	ATM-Franklin-Gas Control	9320	A&G-Maintenance of general plant	2,060															
1835 Total					0														
1836	ATM-Dal-TBS System Support	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(490,863)		(40,349)	(32,397)	(44,178)	(50,215)	(202,579)	(35,146)	(65,067)				(933)		(490,863)
1836	ATM-Dal-TBS System Support		9200	A&G-Administrative & general salaries	320,538														
1836	ATM-Dal-TBS System Support		9210	A&G-Office supplies & expense	19,445														
1836	ATM-Dal-TBS System Support		9260	A&G-Employee pensions and benefits	150,880														
1836	ATM-Dal-TBS System Support		9320	A&G-Maintenance of general plant	0														
1836 Total						0													
1837	ATM-Dal-TBS Application Support	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(945,466)		(77,717)	(62,401)	(65,092)	(96,721)	(390,194)	(67,695)	(163,849)				(1,796)		(945,466)
1837	ATM-Dal-TBS Application Support		9200	A&G-Administrative & general salaries	870,307														
1837	ATM-Dal-TBS Application Support		9210	A&G-Office supplies & expense	55,108														
1837	ATM-Dal-TBS Application Support		9260	A&G-Employee pensions and benefits	219,485														
1837	ATM-Dal-TBS Application Support		9320	A&G-Maintenance of general plant	486														
1837 Total						0													
1838	ATM-Dal-TBS Technical Support	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(1,136,993)		(63,461)	(75,042)	(102,929)	(116,514)	(469,237)	(81,409)	(197,041)				(2,160)		(1,136,993)
1838	ATM-Dal-TBS Technical Support		9200	A&G-Administrative & general salaries	837,276														
1838	ATM-Dal-TBS Technical Support		9210	A&G-Office supplies & expense	25,361														
1838	ATM-Dal-TBS Technical Support		9260	A&G-Employee pensions and benefits	274,124														
1838	ATM-Dal-TBS Technical Support		9320	A&G-Maintenance of general plant	731														
1838 Total						0													
1839	ATM-Dal-TBS Transportation & Scheduling	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(329,624)		(27,096)	(21,756)	(29,696)	(33,721)	(138,036)	(23,601)	(57,124)				(626)		(329,624)
1839	ATM-Dal-TBS Transportation & Scheduling		9200	A&G-Administrative & general salaries	245,820														
1839	ATM-Dal-TBS Transportation & Scheduling		9210	A&G-Office supplies & expense	3,323														
1839	ATM-Dal-TBS Transportation & Scheduling		9260	A&G-Employee pensions and benefits	80,485														
1839	ATM-Dal-TBS Transportation & Scheduling		9320	A&G-Maintenance of general plant	0														
1839 Total						0													
1901	ATM-Dallas Employee Relocation Exp	Composite / Customer	9220	A&G-Administrative expense transferred-Credit	(73,104)		(6,022)	(8,333)	(6,595)	(7,475)	(30,285)	(5,238)	(12,377)	(84)	(50)	(29)	(136)		(73,104)
1901	ATM-Dallas Employee Relocation Exp		8700	Distribution-Operation supervision and engineering	71,629														
1901	ATM-Dallas Employee Relocation Exp		9210	A&G-Office supplies & expense	1,475														
1901 Total						0													
1903	ATM-Dal-Controller Misc	Not Allocated to Business Units	8700	Distribution-Operation supervision and engineering	178,566														
1903	ATM-Dal-Controller Misc		9200	A&G-Administrative & general salaries	(973,368)														
1903	ATM-Dal-Controller Misc		9210	A&G-Office supplies & expense	204,229														
1903	ATM-Dal-Controller Misc		9230	A&G-Outside services employed	(1,143,976)														
1903	ATM-Dal-Controller Misc		9250	A&G-Injuries & damages	(400,000)														
1903	ATM-Dal-Controller Misc		9260	A&G-Employee pensions and benefits	1,610,445														
1903	ATM-Dal-Controller Misc		9302	Miscellaneous general expenses	3,676,901														
1903	ATM-Dal-Controller Misc				3,152,807														
1903 Total						0													
1904	ATM-Dallas Performance Plan	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(15,160,467)		(1,244,674)	(997,559)	(1,361,410)	(1,547,884)	(6,246,112)	(1,083,973)	(2,619,729)	(13,644)	(10,612)	(6,064)	(28,805)		(15,160,467)
1904	ATM-Dallas Performance Plan		9260	A&G-Employee pensions and benefits	15,160,467														
1904 Total						0													
1905	ATM-Outside Director Retirement Cost	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(2,647,076)		(217,325)	(174,176)	(237,707)	(270,266)	(1,090,585)	(169,266)	(457,415)	(2,382)	(1,853)	(1,059)	(5,029)		(2,647,076)
1905	ATM-Outside Director Retirement Cost		9302	Miscellaneous general expenses	2,647,076														
1905 Total						0													
1908	ATM-Dallas SEBP	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(11,360,392)		(932,688)	(747,514)	(1,020,163)	(1,159,896)	(4,680,482)	(812,268)	(1,963,076)	(10,224)	(7,952)	(4,544)	(21,585)		(11,360,392)
1908	ATM-Dallas SEBP		9230	A&G-Outside services employed	269,747														
1908	ATM-Dallas SEBP		9260	A&G-Employee pensions and benefits	11,090,645														
1908 Total						0													
1910	ATM-Corporate Overhead Capitalized	OH Rate Based on Composite	9220	A&G-Administrative expense transferred-Credit	(8,055,196)		7,168,398	5,860,359	7,977,317	8,889,502	36,046,522	6,239,002	13,613,932	60,239	51,633	34,422	111,672		8,055,196
1910	ATM-Corporate Overhead Capitalized		8740	Mains and Services Expenses	(28)														
1910	ATM-Corporate Overhead Capitalized		9200	A&G-Administrative & general salaries	(8,055,168)														
1910 Total						0													
1913	ATM-Dal-Fleet Management	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(761,718)		(62,613)	(50,350)	(68,707)	(78,076)	(314,818)	(54,691)	(132,463)						(761,718)
1913	ATM-Dal-Fleet Management		8740	Mains and Services Expenses	(1,950)														
1913	ATM-Dal-Fleet Management		8800	Distribution-Other expenses	2,785														
1913	ATM-Dal-Fleet Management		9030	Customer accounts-Customer records and collections expenses	700														
1913	ATM-Dal-Fleet Management		9200	A&G-Administrative & general salaries	563,276														
1913	ATM-Dal-Fleet Management		9210	A&G-Office supplies & expense	12,188														
1913	ATM-Dal-Fleet Management		9230	A&G-Outside services employed	300														
1913	ATM-Dal-Fleet Management		9260	A&G-Employee pensions and benefits	184,416														
1913 Total						0													

Sub 40001 Sub 40002 Sub 40003 Sub 40004 Sub 40008 Sub 40009 Sub 40010 Sub 40011 Sub 40012 Sub 40014 Sub 40015 Sub 40017 Total SSU Allocated to Business Units



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-34**  
**Page 1 of 1**

**REQUEST:**

Provide a list and sum total of Shared Services Divisions (Divisions 002 and 012) allocation amounts using the Composite Allocation Factor charged to the Kentucky/Mid-States Division by FERC O&M and A&G expense account for the fiscal year ended September 30, 2020. Include the FERC account description as well as the account number. Provide the information in electronic format with all formulas intact.

**RESPONSE:**

Please see Attachment 1.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-34\_Att1 - SSU O&M Allocated to KMD by FERC Account FY20.xlsx, 13 Pages.

Respondent: Michelle Faulk

Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

							Sub 40004	
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1001	ATM-Dal Executive Chairman	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(3,843,798)	10.21%	(392,452)	
1001	ATM-Dal Executive Chairman		8700	Distribution-Operation supervision and engineering	51	10.21%	5	
1001	ATM-Dal Executive Chairman		9200	A&G-Administrative & general salaries	856,607	10.21%	87,460	
1001	ATM-Dal Executive Chairman		9210	A&G-Office supplies & expense	1,938	10.21%	198	
1001	ATM-Dal Executive Chairman		9260	A&G-Employee pensions and benefits	2,985,203	10.21%	304,789	
1001 Total							-	

							Sub 40004	
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1101	ATM-Dal-Chief Fin Officer	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,582,494)	10.21%	(161,573)	
1101	ATM-Dal-Chief Fin Officer		8700	Distribution-Operation supervision and engineering	158	10.21%	16	
1101	ATM-Dal-Chief Fin Officer		9200	A&G-Administrative & general salaries	553,271	10.21%	56,489	
1101	ATM-Dal-Chief Fin Officer		9210	A&G-Office supplies & expense	121,774	10.21%	12,433	
1101	ATM-Dal-Chief Fin Officer		9260	A&G-Employee pensions and benefits	906,815	10.21%	92,586	
1101	ATM-Dal-Chief Fin Officer		9320	A&G-Maintenance of general plant	477	10.21%	49	
1101 Total					0		0	

							Sub 40004	
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1102	ATM-Dal Utility Operation	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(1,199,841)	12.57%	(150,820)	
1102	ATM-Dal Utility Operation		9200	A&G-Administrative & general salaries	450,696	12.57%	56,653	
1102	ATM-Dal Utility Operation		9210	A&G-Office supplies & expense	155	12.57%	20	
1102	ATM-Dal Utility Operation		9230	A&G-Outside services employed	944	12.57%	119	
1102	ATM-Dal Utility Operation		9260	A&G-Employee pensions and benefits	748,045	12.57%	94,029	
1102 Total					0		0	

							Sub 40004	
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1105	ATM-Dallas Audit	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(4,726,489)	10.21%	(482,574)	
1105	ATM-Dallas Audit		9230	A&G-Outside services employed	4,726,489	10.21%	482,574	
1105 Total					(0)		(0)	

							Sub 40004	
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1106	ATM-Dal-Investor Relations & Treasurer	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(590,421)	10.21%	(60,282)	
1106	ATM-Dal-Investor Relations & Treasurer		9200	A&G-Administrative & general salaries	318,307	10.21%	32,499	
1106	ATM-Dal-Investor Relations & Treasurer		9210	A&G-Office supplies & expense	(3,574)	10.21%	(365)	
1106	ATM-Dal-Investor Relations & Treasurer		9260	A&G-Employee pensions and benefits	275,170	10.21%	28,095	
1106	ATM-Dal-Investor Relations & Treasurer		9320	A&G-Maintenance of general plant	518	10.21%	53	
1106 Total					0		0	

							Sub 40004	
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1107	ATM-Dal-Treasury	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,859,357)	10.21%	(189,840)	
1107	ATM-Dal-Treasury		9030	Customer accounts-Customer records and collections expenses	288	10.21%	29	
1107	ATM-Dal-Treasury		9200	A&G-Administrative & general salaries	739,306	10.21%	75,483	
1107	ATM-Dal-Treasury		9210	A&G-Office supplies & expense	149,582	10.21%	15,272	
1107	ATM-Dal-Treasury		9230	A&G-Outside services employed	3,811	10.21%	389	
1107	ATM-Dal-Treasury		9260	A&G-Employee pensions and benefits	288,923	10.21%	29,499	
1107	ATM-Dal-Treasury		9302	Miscellaneous general expenses	677,280	10.21%	69,150	
1107	ATM-Dal-Treasury		9320	A&G-Maintenance of general plant	167	10.21%	17	
1107 Total					(0)		(0)	

							Sub 40004	
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1108	ATM-Dal-Risk Management	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,339,851)	10.21%	(136,799)	
1108	ATM-Dal-Risk Management		8740	Mains and Services Expenses	(6,182)	10.21%	(631)	
1108	ATM-Dal-Risk Management		9200	A&G-Administrative & general salaries	458,533	10.21%	46,816	
1108	ATM-Dal-Risk Management		9210	A&G-Office supplies & expense	231,456	10.21%	23,632	
1108	ATM-Dal-Risk Management		9230	A&G-Outside services employed	444,224	10.21%	45,355	
1108	ATM-Dal-Risk Management		9260	A&G-Employee pensions and benefits	211,821	10.21%	21,627	
1108 Total					(0)		(0)	

							Sub 40004	
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1110	ATM-Dal-Supply Chain Management	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(264,263)	10.25%	(27,087)	
1110	ATM-Dal-Supply Chain Management		9200	A&G-Administrative & general salaries	176,658	10.25%	18,107	
1110	ATM-Dal-Supply Chain Management		9210	A&G-Office supplies & expense	9,433	10.25%	967	
1110	ATM-Dal-Supply Chain Management		9260	A&G-Employee pensions and benefits	78,171	10.25%	8,013	
1110 Total					(0)		(0)	

							Sub 40004	
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1112	ATM-Dal-Mail & Supply	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(458,084)	10.25%	(46,954)	
1112	ATM-Dal-Mail & Supply		9200	A&G-Administrative & general salaries	127,926	10.25%	13,112	
1112	ATM-Dal-Mail & Supply		9210	A&G-Office supplies & expense	288,275	10.25%	29,548	
1112	ATM-Dal-Mail & Supply		9260	A&G-Employee pensions and benefits	41,883	10.25%	4,293	
1112 Total					0		0	

Sub 40004

Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1114	ATM-Dal-VP & Controller	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(527,894)	10.21%	(53,898)
1114	ATM-Dal-VP & Controller		9200	A&G-Administrative & general salaries	238,818	10.21%	24,383
1114	ATM-Dal-VP & Controller		9210	A&G-Office supplies & expense	52,137	10.21%	5,323
1114	ATM-Dal-VP & Controller		9260	A&G-Employee pensions and benefits	236,916	10.21%	24,189
1114	ATM-Dal-VP & Controller		9302	Miscellaneous general expenses	23	10.21%	2
1114 Total					<u>0</u>		<u>0</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1116	ATM-Dal-Taxation	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(729,029)	10.21%	(74,434)
1116	ATM-Dal-Taxation		9200	A&G-Administrative & general salaries	307,755	10.21%	31,422
1116	ATM-Dal-Taxation		9210	A&G-Office supplies & expense	71,465	10.21%	7,297
1116	ATM-Dal-Taxation		9230	A&G-Outside services employed	90,323	10.21%	9,222
1116	ATM-Dal-Taxation		9260	A&G-Employee pensions and benefits	259,486	10.21%	26,494
1116 Total					<u>0</u>		<u>0</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1117	ATM-Dal-Accounting Svcs	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(517,466)	10.21%	(52,833)
1117	ATM-Dal-Accounting Svcs		8700	Distribution-Operation supervision and engineering	79	10.21%	8
1117	ATM-Dal-Accounting Svcs		9200	A&G-Administrative & general salaries	315,766	10.21%	32,240
1117	ATM-Dal-Accounting Svcs		9210	A&G-Office supplies & expense	108,112	10.21%	11,038
1117	ATM-Dal-Accounting Svcs		9230	A&G-Outside services employed	2,574	10.21%	263
1117	ATM-Dal-Accounting Svcs		9260	A&G-Employee pensions and benefits	90,935	10.21%	9,284
1117 Total					<u>0</u>		<u>0</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1118	ATM-Dal-Supply Chain	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(583,876)	10.25%	(59,847)
1118	ATM-Dal-Supply Chain		8740	Mains and Services Expenses	4,954	10.25%	508
1118	ATM-Dal-Supply Chain		9030	Customer accounts-Customer records and collections expenses	39,399	10.25%	4,038
1118	ATM-Dal-Supply Chain		9200	A&G-Administrative & general salaries	353,871	10.25%	36,272
1118	ATM-Dal-Supply Chain		9210	A&G-Office supplies & expense	56,799	10.25%	5,822
1118	ATM-Dal-Supply Chain		9260	A&G-Employee pensions and benefits	128,377	10.25%	13,159
1118	ATM-Dal-Supply Chain		9320	A&G-Maintenance of general plant	477	10.25%	49
1118 Total					<u>(0)</u>		<u>(0)</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1119	ATM-Dal-General Accounting	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(783,862)	10.21%	(80,032)
1119	ATM-Dal-General Accounting		9200	A&G-Administrative & general salaries	516,957	10.21%	52,781
1119	ATM-Dal-General Accounting		9210	A&G-Office supplies & expense	16,835	10.21%	1,719
1119	ATM-Dal-General Accounting		9230	A&G-Outside services employed	76,519	10.21%	7,813
1119	ATM-Dal-General Accounting		9260	A&G-Employee pensions and benefits	169,252	10.21%	17,281
1119	ATM-Dal-General Accounting		9302	Miscellaneous general expenses	100	10.21%	10
1119	ATM-Dal-General Accounting		9310	A&G-Rents	4,199	10.21%	429
1119 Total					<u>0</u>		<u>0</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1120	ATM-Dal-Accounts Payable	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(753,292)	10.21%	(76,911)
1120	ATM-Dal-Accounts Payable		9200	A&G-Administrative & general salaries	461,634	10.21%	47,133
1120	ATM-Dal-Accounts Payable		9210	A&G-Office supplies & expense	147,068	10.21%	15,016
1120	ATM-Dal-Accounts Payable		9260	A&G-Employee pensions and benefits	144,591	10.21%	14,763
1120 Total					<u>(0)</u>		<u>(0)</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1121	ATM-Dal-Plant Accounting	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(786,798)	10.21%	(80,332)
1121	ATM-Dal-Plant Accounting		9200	A&G-Administrative & general salaries	571,758	10.21%	58,376
1121	ATM-Dal-Plant Accounting		9210	A&G-Office supplies & expense	9,784	10.21%	999
1121	ATM-Dal-Plant Accounting		9230	A&G-Outside services employed	17,940	10.21%	1,832
1121	ATM-Dal-Plant Accounting		9260	A&G-Employee pensions and benefits	187,194	10.21%	19,112
1121	ATM-Dal-Plant Accounting		9320	A&G-Maintenance of general plant	123	10.21%	13
1121 Total					<u>(0)</u>		<u>(0)</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1123	ATM-Dal-Gas Accounting	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(308,732)	10.23%	(31,583)
1123	ATM-Dal-Gas Accounting		9200	A&G-Administrative & general salaries	192,698	10.23%	19,713
1123	ATM-Dal-Gas Accounting		9210	A&G-Office supplies & expense	9,968	10.23%	1,020
1123	ATM-Dal-Gas Accounting		9260	A&G-Employee pensions and benefits	106,067	10.23%	10,851
1123 Total					<u>0</u>		<u>0</u>

Sub 40004

Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1125	ATM-Dal-Financial Reporting	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,903,322)	10.21%	(194,329)
1125	ATM-Dal-Financial Reporting		9200	A&G-Administrative & general salaries	1,093,951	10.21%	111,692
1125	ATM-Dal-Financial Reporting		9210	A&G-Office supplies & expense	236,340	10.21%	24,130
1125	ATM-Dal-Financial Reporting		9230	A&G-Outside services employed	31,418	10.21%	3,208
1125	ATM-Dal-Financial Reporting		9260	A&G-Employee pensions and benefits	443,579	10.21%	45,289
1125	ATM-Dal-Financial Reporting		9302	Miscellaneous general expenses	97,863	10.21%	9,992
1125	ATM-Dal-Financial Reporting		9320	A&G-Maintenance of general plant	170	10.21%	17
1125 Total					<u>(0)</u>		<u>(0)</u>

Sub 40004

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1126	ATM-Dal-Payroll	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(576,484)	10.21%	(58,859)
1126	ATM-Dal-Payroll		9030	Customer accounts-Customer records and collections expenses	72,492	10.21%	7,401
1126	ATM-Dal-Payroll		9200	A&G-Administrative & general salaries	328,787	10.21%	33,569
1126	ATM-Dal-Payroll		9210	A&G-Office supplies & expense	5,408	10.21%	552
1126	ATM-Dal-Payroll		9230	A&G-Outside services employed	38,764	10.21%	3,958
1126	ATM-Dal-Payroll		9260	A&G-Employee pensions and benefits	131,033	10.21%	13,378
1126 Total					<u>0</u>		<u>0</u>

Sub 40004

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1128	ATM-Dal-Property & Sales Tax	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(2,846,752)	10.21%	(290,653)
1128	ATM-Dal-Property & Sales Tax		9200	A&G-Administrative & general salaries	1,456,274	10.21%	148,686
1128	ATM-Dal-Property & Sales Tax		9210	A&G-Office supplies & expense	289,640	10.21%	29,572
1128	ATM-Dal-Property & Sales Tax		9230	A&G-Outside services employed	582,779	10.21%	59,502
1128	ATM-Dal-Property & Sales Tax		9260	A&G-Employee pensions and benefits	518,059	10.21%	52,894
1128 Total						<u>0</u>	

Sub 40004

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1129	ATM-Dal-Income Tax	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,266,225)	10.21%	(129,282)
1129	ATM-Dal-Income Tax		9200	A&G-Administrative & general salaries	619,926	10.21%	63,294
1129	ATM-Dal-Income Tax		9210	A&G-Office supplies & expense	111,972	10.21%	11,432
1129	ATM-Dal-Income Tax		9230	A&G-Outside services employed	308,037	10.21%	31,451
1129	ATM-Dal-Income Tax		9260	A&G-Employee pensions and benefits	226,173	10.21%	23,092
1129	ATM-Dal-Income Tax		9320	A&G-Maintenance of general plant	118	10.21%	12
1129 Total					<u>0</u>		<u>0</u>

Sub 40004

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1130	ATM-Dal-Busi Planning & Analysis	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,418,953)	10.21%	(144,875)
1130	ATM-Dal-Busi Planning & Analysis		8700	Distribution-Operation supervision and engineering	838	10.21%	86
1130	ATM-Dal-Busi Planning & Analysis		9200	A&G-Administrative & general salaries	945,599	10.21%	96,546
1130	ATM-Dal-Busi Planning & Analysis		9210	A&G-Office supplies & expense	97,409	10.21%	9,945
1130	ATM-Dal-Busi Planning & Analysis		9260	A&G-Employee pensions and benefits	375,107	10.21%	38,298
1130 Total						<u>(0)</u>	

Sub 40004

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1131	ATM-Dallas Media Relations	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(29,333)	10.25%	(3,007)
1131	ATM-Dallas Media Relations		9210	A&G-Office supplies & expense	29,333	10.25%	3,007
1131 Total					<u>0</u>		<u>0</u>

Sub 40004

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1132	ATM-Dal-Investor Relations	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(664,866)	10.21%	(67,883)
1132	ATM-Dal-Investor Relations		8700	Distribution-Operation supervision and engineering	150	10.21%	15
1132	ATM-Dal-Investor Relations		9200	A&G-Administrative & general salaries	228,301	10.21%	23,309
1132	ATM-Dal-Investor Relations		9210	A&G-Office supplies & expense	205,273	10.21%	20,958
1132	ATM-Dal-Investor Relations		9260	A&G-Employee pensions and benefits	(97,836)	10.21%	(9,989)
1132	ATM-Dal-Investor Relations		9302	Miscellaneous general expenses	328,978	10.21%	33,589
1132 Total					<u>0</u>		<u>0</u>

Sub 40004

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1133	ATM-Dal-Corporate Communications	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(2,010,762)	10.21%	(205,299)
1133	ATM-Dal-Corporate Communications		9120	Sales-Demonstrating and selling expenses	105,849	10.21%	10,807
1133	ATM-Dal-Corporate Communications		9200	A&G-Administrative & general salaries	936,575	10.21%	95,624
1133	ATM-Dal-Corporate Communications		9210	A&G-Office supplies & expense	534,986	10.21%	54,622
1133	ATM-Dal-Corporate Communications		9230	A&G-Outside services employed	99,646	10.21%	10,174
1133	ATM-Dal-Corporate Communications		9260	A&G-Employee pensions and benefits	326,611	10.21%	33,347
1133	ATM-Dal-Corporate Communications		9320	A&G-Maintenance of general plant	7,097	10.21%	725
1133 Total					<u>0</u>		<u>0</u>

Sub 40004

Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1134	ATM-Dal-IT	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(2,703,428)	10.21%	(276,020)
1134	ATM-Dal-IT		9200	A&G-Administrative & general salaries	1,492,229	10.21%	152,357
1134	ATM-Dal-IT		9210	A&G-Office supplies & expense	181,955	10.21%	18,578
1134	ATM-Dal-IT		9260	A&G-Employee pensions and benefits	1,029,196	10.21%	105,081
1134	ATM-Dal-IT		9320	A&G-Maintenance of general plant	49	10.21%	5
1134 Total					(0)		(0)

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1135	ATM-Dal-IT E&O Corporate Systems	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(10,749,324)	10.21%	(1,097,506)
1135	ATM-Dal-IT E&O Corporate Systems		9200	A&G-Administrative & general salaries	2,246,007	10.21%	229,317
1135	ATM-Dal-IT E&O Corporate Systems		9210	A&G-Office supplies & expense	7,657,880	10.21%	781,870
1135	ATM-Dal-IT E&O Corporate Systems		9230	A&G-Outside services employed	34,352	10.21%	3,507
1135	ATM-Dal-IT E&O Corporate Systems		9260	A&G-Employee pensions and benefits	795,424	10.21%	81,213
1135	ATM-Dal-IT E&O Corporate Systems		9302	Miscellaneous general expenses	12,301	10.21%	1,266
1135	ATM-Dal-IT E&O Corporate Systems		9320	A&G-Maintenance of general plant	3,359	10.21%	343
1135 Total					(0)		(0)

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1137	ATM-Dal-IT Engineering & Operations	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(19,866,301)	10.21%	(2,028,349)
1137	ATM-Dal-IT Engineering & Operations		9200	A&G-Administrative & general salaries	3,724,697	10.21%	380,292
1137	ATM-Dal-IT Engineering & Operations		9210	A&G-Office supplies & expense	13,444,631	10.21%	1,372,697
1137	ATM-Dal-IT Engineering & Operations		9230	A&G-Outside services employed	1,435,044	10.21%	146,518
1137	ATM-Dal-IT Engineering & Operations		9260	A&G-Employee pensions and benefits	1,219,466	10.21%	124,507
1137	ATM-Dal-IT Engineering & Operations		9310	A&G-Rents	3,174	10.21%	324
1137	ATM-Dal-IT Engineering & Operations		9320	A&G-Maintenance of general plant	39,290	10.21%	4,011
1137 Total					(0)		(0)

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1141	ATM-Dal-Gas Purchase Acctg	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(630,507)	12.57%	(79,255)
1141	ATM-Dal-Gas Purchase Acctg		9200	A&G-Administrative & general salaries	472,902	12.57%	59,444
1141	ATM-Dal-Gas Purchase Acctg		9210	A&G-Office supplies & expense	2,776	12.57%	349
1141	ATM-Dal-Gas Purchase Acctg		9260	A&G-Employee pensions and benefits	154,828	12.57%	19,462
1141 Total					(0)		(0)

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1144	ATM-Dal-Gas Acctg Systems & Rate Admin	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(807,849)	12.57%	(101,547)
1144	ATM-Dal-Gas Acctg Systems & Rate Admin		9200	A&G-Administrative & general salaries	605,573	12.57%	76,121
1144	ATM-Dal-Gas Acctg Systems & Rate Admin		9210	A&G-Office supplies & expense	3,786	12.57%	473
1144	ATM-Dal-Gas Acctg Systems & Rate Admin		9260	A&G-Employee pensions and benefits	198,265	12.57%	24,922
1144	ATM-Dal-Gas Acctg Systems & Rate Admin		9320	A&G-Maintenance of general plant	246	12.57%	31
1144 Total					0		0

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1145	ATM-Dal-Revenue Accounting	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(421,190)	12.57%	(52,944)
1145	ATM-Dal-Revenue Accounting		9200	A&G-Administrative & general salaries	293,862	12.57%	36,938
1145	ATM-Dal-Revenue Accounting		9210	A&G-Office supplies & expense	5,737	12.57%	721
1145	ATM-Dal-Revenue Accounting		9260	A&G-Employee pensions and benefits	121,591	12.57%	15,284
1145 Total					(0)		(0)

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1146	ATM-Dallas IT Enterprise Solutions	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(513,375)	10.21%	(52,416)
1146	ATM-Dallas IT Enterprise Solutions		9210	A&G-Office supplies & expense	513,375	10.21%	52,416
1146 Total					-		-

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1150	ATM-Dal-Strategic Planning	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(976,140)	10.21%	(99,664)
1150	ATM-Dal-Strategic Planning		9200	A&G-Administrative & general salaries	450,804	10.21%	46,027
1150	ATM-Dal-Strategic Planning		9210	A&G-Office supplies & expense	31,484	10.21%	3,215
1150	ATM-Dal-Strategic Planning		9260	A&G-Employee pensions and benefits	493,099	10.21%	50,345
1150	ATM-Dal-Strategic Planning		9320	A&G-Maintenance of general plant	752	10.21%	77
1150 Total					0		0

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1153	ATM-Dal-Distribution Acctg	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(975,833)	12.57%	(122,662)
1153	ATM-Dal-Distribution Acctg		9200	A&G-Administrative & general salaries	733,917	12.57%	92,253
1153	ATM-Dal-Distribution Acctg		9210	A&G-Office supplies & expense	1,631	12.57%	205
1153	ATM-Dal-Distribution Acctg		9260	A&G-Employee pensions and benefits	240,285	12.57%	30,204
1153 Total					(0)		(0)

Sub 40004



Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1154	ATM-Dal-Rates & Regulatory	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(3,137,788)	10.25%	(321,623)
1154	ATM-Dal-Rates & Regulatory		8700	Distribution-Operation supervision and engineering	16,720	10.25%	1,714
1154	ATM-Dal-Rates & Regulatory		9200	A&G-Administrative & general salaries	1,903,920	10.25%	195,152
1154	ATM-Dal-Rates & Regulatory		9210	A&G-Office supplies & expense	378,110	10.25%	38,756
1154	ATM-Dal-Rates & Regulatory		9230	A&G-Outside services employed	22,681	10.25%	2,325
1154	ATM-Dal-Rates & Regulatory		9260	A&G-Employee pensions and benefits	814,190	10.25%	83,454
1154	ATM-Dal-Rates & Regulatory		9320	A&G-Maintenance of general plant	2,168	10.25%	222
1154 Total					<u>0</u>		<u>0</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1155	ATM-Dal-Gas Pipeline Accounting	Composite - APT and TLGP	9220	A&G-Administrative expense transferred-Credit	(195,730)	0.00%	-
1155	ATM-Dal-Gas Pipeline Accounting		9200	A&G-Administrative & general salaries	143,188	0.00%	-
1155	ATM-Dal-Gas Pipeline Accounting		9210	A&G-Office supplies & expense	5,662	0.00%	-
1155	ATM-Dal-Gas Pipeline Accounting		9260	A&G-Employee pensions and benefits	46,880	0.00%	-
1155 Total					<u>-</u>		<u>-</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1156	ATM-Dal-IT Customer Services Systems	Customer	9220	A&G-Administrative expense transferred-Credit	(7,911,222)	10.99%	(869,443)
1156	ATM-Dal-IT Customer Services Systems		9200	A&G-Administrative & general salaries	2,382,238	10.99%	261,808
1156	ATM-Dal-IT Customer Services Systems		9210	A&G-Office supplies & expense	3,693,880	10.99%	405,957
1156	ATM-Dal-IT Customer Services Systems		9230	A&G-Outside services employed	1,029,151	10.99%	113,104
1156	ATM-Dal-IT Customer Services Systems		9260	A&G-Employee pensions and benefits	804,358	10.99%	88,399
1156	ATM-Dal-IT Customer Services Systems		9302	Miscellaneous general expenses	1,279	10.99%	141
1156	ATM-Dal-IT Customer Services Systems		9320	A&G-Maintenance of general plant	315	10.99%	35
1156 Total						<u>0</u>	

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1158	ATM-CCC IT Support	Customer	9220	A&G-Administrative expense transferred-Credit	(2,216,545)	10.99%	(243,598)
1158	ATM-CCC IT Support		9210	A&G-Office supplies & expense	2,030,355	10.99%	223,136
1158	ATM-CCC IT Support		9230	A&G-Outside services employed	186,190	10.99%	20,462
1158 Total					<u>(0)</u>		<u>(0)</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1159	ATM-Dal-Technical Training	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,288,858)	10.21%	(131,592)
1159	ATM-Dal-Technical Training		9100	Customer service-Miscellaneous customer service	999	10.21%	92
1159	ATM-Dal-Technical Training		9200	A&G-Administrative & general salaries	304,756	10.21%	31,116
1159	ATM-Dal-Technical Training		9210	A&G-Office supplies & expense	710,335	10.21%	72,525
1159	ATM-Dal-Technical Training		9260	A&G-Employee pensions and benefits	272,869	10.21%	27,860
1159 Total					<u>(0)</u>		<u>(0)</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1161	ATM-Dal-Benefits & Payroll Accounting	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(531,650)	10.21%	(54,281)
1161	ATM-Dal-Benefits & Payroll Accounting		9200	A&G-Administrative & general salaries	394,550	10.21%	40,284
1161	ATM-Dal-Benefits & Payroll Accounting		9210	A&G-Office supplies & expense	7,925	10.21%	809
1161	ATM-Dal-Benefits & Payroll Accounting		9260	A&G-Employee pensions and benefits	129,176	10.21%	13,189
1161 Total					<u>0</u>		<u>0</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1164	ATM-Dal-IT Security	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(5,199,812)	10.21%	(530,901)
1164	ATM-Dal-IT Security		9200	A&G-Administrative & general salaries	1,099,020	10.21%	112,210
1164	ATM-Dal-IT Security		9210	A&G-Office supplies & expense	2,478,278	10.21%	253,032
1164	ATM-Dal-IT Security		9230	A&G-Outside services employed	1,133,543	10.21%	115,735
1164	ATM-Dal-IT Security		9260	A&G-Employee pensions and benefits	359,819	10.21%	36,738
1164	ATM-Dal-IT Security		9310	A&G-Rents	106,403	10.21%	10,864
1164	ATM-Dal-IT Security		9320	A&G-Maintenance of general plant	22,750	10.21%	2,323
1164 Total						<u>0</u>	

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1167	ATM-Dal-IT Enterprise Architecture	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(2,801,435)	10.25%	(287,147)
1167	ATM-Dal-IT Enterprise Architecture		9200	A&G-Administrative & general salaries	1,339,421	10.25%	137,291
1167	ATM-Dal-IT Enterprise Architecture		9210	A&G-Office supplies & expense	583,319	10.25%	59,790
1167	ATM-Dal-IT Enterprise Architecture		9230	A&G-Outside services employed	429,457	10.25%	44,019
1167	ATM-Dal-IT Enterprise Architecture		9260	A&G-Employee pensions and benefits	438,527	10.25%	44,949
1167	ATM-Dal-IT Enterprise Architecture		9320	A&G-Maintenance of general plant	10,711	10.25%	1,098
1167 Total						<u>(0)</u>	

Sub 40004

Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1201	ATM-Dal President & CEO	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(3,853,462)	10.21%	(393,438)
1201	ATM-Dal President & CEO		9200	A&G-Administrative & general salaries	1,219,108	10.21%	124,471
1201	ATM-Dal President & CEO		9210	A&G-Office supplies & expense	16,309	10.21%	1,665
1201	ATM-Dal President & CEO		9260	A&G-Employee pensions and benefits	2,571,009	10.21%	262,500
1201	ATM-Dal President & CEO		9302	Miscellaneous general expenses	46,400	10.21%	4,737
1201	ATM-Dal President & CEO		9320	A&G-Maintenance of general plant	636	10.21%	65
1201 Total					<u>0</u>		<u>0</u>

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1205	ATM-Dal Executive Vice President	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(140,856)	10.21%	(14,381)
1205	ATM-Dal Executive Vice President		9200	A&G-Administrative & general salaries	66,882	10.21%	6,829
1205	ATM-Dal Executive Vice President		9210	A&G-Office supplies & expense	52,077	10.21%	5,317
1205	ATM-Dal Executive Vice President		9260	A&G-Employee pensions and benefits	21,897	10.21%	2,236
1205 Total						<u>(0)</u>	

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1209	ATM-Dal-Security & Compliance	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(1,271,009)	10.25%	(130,278)	
1209	ATM-Dal-Security & Compliance		8700	Distribution-Operation supervision and engineering	53	10.25%	5	
1209	ATM-Dal-Security & Compliance		9200	A&G-Administrative & general salaries	726,165	10.25%	74,432	
1209	ATM-Dal-Security & Compliance		9210	A&G-Office supplies & expense	209,053	10.25%	21,428	
1209	ATM-Dal-Security & Compliance		9230	A&G-Outside services employed	595	10.25%	61	
1209	ATM-Dal-Security & Compliance		9250	A&G-Injuries & damages	55,382	10.25%	5,677	
1209	ATM-Dal-Security & Compliance		9260	A&G-Employee pensions and benefits	271,423	10.25%	27,821	
1209	ATM-Dal-Security & Compliance		9320	A&G-Maintenance of general plant	8,339	10.25%	855	
1209 Total						<u>(0)</u>		<u>(0)</u>

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1212	ATM-CSO-Customer Contact Center	Customer	9220	A&G-Administrative expense transferred-Credit	(23,223,494)	10.99%	(2,552,262)	
1212	ATM-CSO-Customer Contact Center		8740	Mains and Services Expenses	8,398	10.99%	923	
1212	ATM-CSO-Customer Contact Center		9010	Customer accounts-Operation supervision	2,712,999	10.99%	298,159	
1212	ATM-CSO-Customer Contact Center		9030	Customer accounts-Customer records and collections expenses	13,089,721	10.99%	1,438,960	
1212	ATM-CSO-Customer Contact Center		9200	A&G-Administrative & general salaries	(13,834)	10.99%	(1,520)	
1212	ATM-CSO-Customer Contact Center		9210	A&G-Office supplies & expense	1,917,473	10.99%	210,730	
1212	ATM-CSO-Customer Contact Center		9230	A&G-Outside services employed	26,720	10.99%	2,937	
1212	ATM-CSO-Customer Contact Center		9260	A&G-Employee pensions and benefits	5,190,011	10.99%	570,382	
1212	ATM-CSO-Customer Contact Center		9310	A&G-Rents	292,005	10.99%	32,091	
1212 Total						<u>0</u>		<u>0</u>

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div	
1215	ATM-Dal-Dispatch Operations	Customer	9220	A&G-Administrative expense transferred-Credit	(6,816,970)	10.99%	(749,185)	
1215	ATM-Dal-Dispatch Operations		8740	Mains and Services Expenses	76,253	10.99%	8,380	
1215	ATM-Dal-Dispatch Operations		8750	Distribution-Measuring and regulating station expenses	87	10.99%	10	
1215	ATM-Dal-Dispatch Operations		9010	Customer accounts-Operation supervision	777,549	10.99%	85,453	
1215	ATM-Dal-Dispatch Operations		9030	Customer accounts-Customer records and collections expenses	4,109,860	10.99%	451,674	
1215	ATM-Dal-Dispatch Operations		9200	A&G-Administrative & general salaries	71,499	10.99%	7,858	
1215	ATM-Dal-Dispatch Operations		9210	A&G-Office supplies & expense	89,452	10.99%	9,831	
1215	ATM-Dal-Dispatch Operations		9260	A&G-Employee pensions and benefits	1,686,274	10.99%	185,321	
1215	ATM-Dal-Dispatch Operations		9310	A&G-Rents	5,998	10.99%	659	
1215 Total						<u>(0)</u>		<u>(0)</u>

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1216	ATM-Dallas Training Quality & Innovation	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(544,008)	10.21%	(55,543)
1216	ATM-Dallas Training Quality & Innovation		9200	A&G-Administrative & general salaries	401,092	10.21%	40,952
1216	ATM-Dallas Training Quality & Innovation		9210	A&G-Office supplies & expense	10,395	10.21%	1,061
1216	ATM-Dallas Training Quality & Innovation		9260	A&G-Employee pensions and benefits	131,318	10.21%	13,408
1216	ATM-Dallas Training Quality & Innovation		9320	A&G-Maintenance of general plant	1,204	10.21%	123
1216 Total					<u>(0)</u>		<u>(0)</u>

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1221	ATM-Dal Pipeline Admin	AELIG, WKG, UCG, TLGP, MS and LA	9220	A&G-Administrative expense transferred-Credit	(378,121)	0.00%	-
1221	ATM-Dal Pipeline Admin		9200	A&G-Administrative & general salaries	213,665	0.00%	-
1221	ATM-Dal Pipeline Admin		9210	A&G-Office supplies & expense	5,585	0.00%	-
1221	ATM-Dal Pipeline Admin		9260	A&G-Employee pensions and benefits	168,362	0.00%	-
1221	ATM-Dal Pipeline Admin		9320	A&G-Maintenance of general plant	509	0.00%	-
1221 Total					<u>(0)</u>		<u>-</u>

Sub 40004

Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1224	ATM-Dal-CSO Human Resources	Customer	9220	A&G-Administrative expense transferred-Credit	(774,628)	10.99%	(85,132)
1224	ATM-Dal-CSO Human Resources		9030	Customer accounts-Customer records and collections expenses	287,015	10.99%	31,543
1224	ATM-Dal-CSO Human Resources		9200	A&G-Administrative & general salaries	290,799	10.99%	31,959
1224	ATM-Dal-CSO Human Resources		9210	A&G-Office supplies & expense	9,572	10.99%	1,052
1224	ATM-Dal-CSO Human Resources		9260	A&G-Employee pensions and benefits	186,417	10.99%	20,487
1224	ATM-Dal-CSO Human Resources		9320	A&G-Maintenance of general plant	825	10.99%	91
1224 Total					(0)		(0)

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1226	ATM-Dal-Customer Service	Customer	9220	A&G-Administrative expense transferred-Credit	(3,258,312)	10.99%	(358,089)
1226	ATM-Dal-Customer Service		9010	Customer accounts-Operation supervision	178	10.99%	20
1226	ATM-Dal-Customer Service		9030	Customer accounts-Customer records and collections expenses	613,834	10.99%	67,460
1226	ATM-Dal-Customer Service		9200	A&G-Administrative & general salaries	807,913	10.99%	88,790
1226	ATM-Dal-Customer Service		9210	A&G-Office supplies & expense	337,099	10.99%	37,047
1226	ATM-Dal-Customer Service		9260	A&G-Employee pensions and benefits	608,783	10.99%	66,905
1226	ATM-Dal-Customer Service		9310	A&G-Rents	889,302	10.99%	97,734
1226	ATM-Dal-Customer Service		9320	A&G-Maintenance of general plant	1,204	10.99%	132
1226 Total					0		0

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1227	ATM-Dal-Customer Program Mgmt	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(2,795,747)	10.25%	(286,564)
1227	ATM-Dal-Customer Program Mgmt		9200	A&G-Administrative & general salaries	1,574,802	10.25%	161,417
1227	ATM-Dal-Customer Program Mgmt		9210	A&G-Office supplies & expense	631,160	10.25%	64,694
1227	ATM-Dal-Customer Program Mgmt		9260	A&G-Employee pensions and benefits	589,322	10.25%	60,406
1227	ATM-Dal-Customer Program Mgmt		9320	A&G-Maintenance of general plant	462	10.25%	47
1227 Total					(0)		(0)

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1228	ATM-Dal-Customer Revenue Management	Customer	9220	A&G-Administrative expense transferred-Credit	(5,165,871)	10.99%	(567,729)
1228	ATM-Dal-Customer Revenue Management		8700	Distribution-Operation supervision and engineering	236	10.99%	26
1228	ATM-Dal-Customer Revenue Management		8740	Mains and Services Expenses	(1,645)	10.99%	(181)
1228	ATM-Dal-Customer Revenue Management		9010	Customer accounts-Operation supervision	769,236	10.99%	84,539
1228	ATM-Dal-Customer Revenue Management		9030	Customer accounts-Customer records and collections expenses	2,946,249	10.99%	323,793
1228	ATM-Dal-Customer Revenue Management		9200	A&G-Administrative & general salaries	(2,547)	10.99%	(280)
1228	ATM-Dal-Customer Revenue Management		9210	A&G-Office supplies & expense	301,903	10.99%	33,179
1228	ATM-Dal-Customer Revenue Management		9230	A&G-Outside services employed	15,420	10.99%	1,695
1228	ATM-Dal-Customer Revenue Management		9260	A&G-Employee pensions and benefits	1,135,470	10.99%	124,788
1228	ATM-Dal-Customer Revenue Management		9320	A&G-Maintenance of general plant	1,548	10.99%	170
1228 Total					0		0

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1229	ATM-Dal Pipeline Safety	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(2,518,903)	10.25%	(258,188)
1229	ATM-Dal Pipeline Safety		8700	Distribution-Operation supervision and engineering	832	10.25%	85
1229	ATM-Dal Pipeline Safety		8800	Distribution-Other expenses	17,191	10.25%	1,762
1229	ATM-Dal Pipeline Safety		8810	Distribution-Rents	6,762	10.25%	693
1229	ATM-Dal Pipeline Safety		9030	Customer accounts-Customer records and collections expenses	627	10.25%	64
1229	ATM-Dal Pipeline Safety		9200	A&G-Administrative & general salaries	1,356,186	10.25%	139,009
1229	ATM-Dal Pipeline Safety		9210	A&G-Office supplies & expense	325,860	10.25%	33,401
1229	ATM-Dal Pipeline Safety		9230	A&G-Outside services employed	38,504	10.25%	3,947
1229	ATM-Dal Pipeline Safety		9260	A&G-Employee pensions and benefits	751,020	10.25%	76,980
1229	ATM-Dal Pipeline Safety		9302	Miscellaneous general expenses	20,502	10.25%	2,101
1229	ATM-Dal Pipeline Safety		9320	A&G-Maintenance of general plant	1,419	10.25%	145
1229 Total					0		0

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1401	ATM-Dal-Employment & Emp Rel	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(697,162)	10.21%	(71,180)
1401	ATM-Dal-Employment & Emp Rel		9200	A&G-Administrative & general salaries	483,628	10.21%	49,378
1401	ATM-Dal-Employment & Emp Rel		9210	A&G-Office supplies & expense	14,895	10.21%	1,521
1401	ATM-Dal-Employment & Emp Rel		9230	A&G-Outside services employed	39,109	10.21%	3,993
1401	ATM-Dal-Employment & Emp Rel		9260	A&G-Employee pensions and benefits	169,467	10.21%	16,282
1401	ATM-Dal-Employment & Emp Rel		9320	A&G-Maintenance of general plant	64	10.21%	6
1401 Total					(0)		(0)

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1402	ATM-Dallas Executive Compensation	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(319,576)	10.21%	(32,629)
1402	ATM-Dallas Executive Compensation		8700	Distribution-Operation supervision and engineering	1,099	10.21%	112
1402	ATM-Dallas Executive Compensation		9210	A&G-Office supplies & expense	1,566	10.21%	160
1402	ATM-Dallas Executive Compensation		9230	A&G-Outside services employed	282,736	10.21%	28,867
1402	ATM-Dallas Executive Compensation		9260	A&G-Employee pensions and benefits	34,176	10.21%	3,489
1402 Total					(0)		(0)

Sub 40004

Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1403	ATM-Dal SVP Human Resources	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,582,356)	10.21%	(161,559)
1403	ATM-Dal SVP Human Resources		8700	Distribution-Operation supervision and engineering	107	10.21%	11
1403	ATM-Dal SVP Human Resources		8740	Mains and Services Expenses	421	10.21%	43
1403	ATM-Dal SVP Human Resources		9200	A&G-Administrative & general salaries	711,109	10.21%	72,604
1403	ATM-Dal SVP Human Resources		9210	A&G-Office supplies & expense	14,653	10.21%	1,496
1403	ATM-Dal SVP Human Resources		9260	A&G-Employee pensions and benefits	856,036	10.21%	87,401
1403	ATM-Dal SVP Human Resources		9320	A&G-Maintenance of general plant	30	10.21%	3
1403 Total					(0)		(0)

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1405	ATM-Dal-Benefits	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,402,569)	10.21%	(143,202)
1405	ATM-Dal-Benefits		8700	Distribution-Operation supervision and engineering	289	10.21%	30
1405	ATM-Dal-Benefits		9200	A&G-Administrative & general salaries	829,097	10.21%	84,651
1405	ATM-Dal-Benefits		9210	A&G-Office supplies & expense	30,686	10.21%	3,133
1405	ATM-Dal-Benefits		9230	A&G-Outside services employed	212,605	10.21%	21,707
1405	ATM-Dal-Benefits		9260	A&G-Employee pensions and benefits	329,204	10.21%	33,612
1405	ATM-Dal-Benefits		9302	Miscellaneous general expenses	30	10.21%	3
1405	ATM-Dal-Benefits		9320	A&G-Maintenance of general plant	659	10.21%	67
1405 Total					(0)		(0)

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1407	ATM-Dal-Facilities	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(6,350,030)	10.21%	(648,338)
1407	ATM-Dal-Facilities		8740	Mains and Services Expenses	29,306	10.21%	2,992
1407	ATM-Dal-Facilities		9200	A&G-Administrative & general salaries	647,095	10.21%	66,068
1407	ATM-Dal-Facilities		9210	A&G-Office supplies & expense	741,189	10.21%	75,675
1407	ATM-Dal-Facilities		9260	A&G-Employee pensions and benefits	254,710	10.21%	26,006
1407	ATM-Dal-Facilities		9310	A&G-Rents	4,675,103	10.21%	477,328
1407	ATM-Dal-Facilities		9320	A&G-Maintenance of general plant	2,628	10.21%	268
1407 Total					(0)		(0)

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1408	ATM-Dal-Employee Dev	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,520,585)	10.21%	(155,252)
1408	ATM-Dal-Employee Dev		8700	Distribution-Operation supervision and engineering	2,617	10.21%	267
1408	ATM-Dal-Employee Dev		8740	Mains and Services Expenses	619	10.21%	63
1408	ATM-Dal-Employee Dev		9010	Customer accounts-Operation supervision	2,418	10.21%	247
1408	ATM-Dal-Employee Dev		9110	Sales-Supervision	3,022	10.21%	309
1408	ATM-Dal-Employee Dev		9200	A&G-Administrative & general salaries	625,402	10.21%	63,854
1408	ATM-Dal-Employee Dev		9210	A&G-Office supplies & expense	255,199	10.21%	26,056
1408	ATM-Dal-Employee Dev		9260	A&G-Employee pensions and benefits	629,982	10.21%	64,321
1408	ATM-Dal-Employee Dev		9320	A&G-Maintenance of general plant	1,326	10.21%	135
1408 Total					0		0

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1414	ATM-Dal-Tech Training Delivery	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(2,936,422)	10.25%	(300,983)
1414	ATM-Dal-Tech Training Delivery		8700	Distribution-Operation supervision and engineering	2,115	10.25%	217
1414	ATM-Dal-Tech Training Delivery		8740	Mains and Services Expenses	59,674	10.25%	6,117
1414	ATM-Dal-Tech Training Delivery		9200	A&G-Administrative & general salaries	1,418,616	10.25%	145,408
1414	ATM-Dal-Tech Training Delivery		9210	A&G-Office supplies & expense	960,961	10.25%	98,498
1414	ATM-Dal-Tech Training Delivery		9260	A&G-Employee pensions and benefits	464,455	10.25%	47,607
1414	ATM-Dal-Tech Training Delivery		9310	A&G-Rents	30,602	10.25%	3,137
1414 Total					0		0

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1415	ATM-Dal-Tech Trng Prog & Curriculum	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(799,785)	10.25%	(81,978)
1415	ATM-Dal-Tech Trng Prog & Curriculum		9200	A&G-Administrative & general salaries	571,506	10.25%	58,579
1415	ATM-Dal-Tech Trng Prog & Curriculum		9210	A&G-Office supplies & expense	24,884	10.25%	2,551
1415	ATM-Dal-Tech Trng Prog & Curriculum		9230	A&G-Outside services employed	(1,745)	10.25%	(179)
1415	ATM-Dal-Tech Trng Prog & Curriculum		9260	A&G-Employee pensions and benefits	187,111	10.25%	19,179
1415	ATM-Dal-Tech Trng Prog & Curriculum		9320	A&G-Maintenance of general plant	18,030	10.25%	1,848
1415 Total					0		0

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1416	ATM-Dal-Compensation & HRMS	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,402,668)	10.21%	(143,212)
1416	ATM-Dal-Compensation & HRMS		9200	A&G-Administrative & general salaries	934,360	10.21%	95,398
1416	ATM-Dal-Compensation & HRMS		9210	A&G-Office supplies & expense	17,047	10.21%	1,741
1416	ATM-Dal-Compensation & HRMS		9230	A&G-Outside services employed	118,863	10.21%	12,136
1416	ATM-Dal-Compensation & HRMS		9260	A&G-Employee pensions and benefits	332,248	10.21%	33,923
1416	ATM-Dal-Compensation & HRMS		9320	A&G-Maintenance of general plant	149	10.21%	15
1416 Total					(0)		(0)

Sub 40004

Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1417	ATM-Dal Corporate Programs	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(347,404)	10.21%	(35,470)
1417	ATM-Dal Corporate Programs		8700	Distribution-Operation supervision and engineering	3,356	10.21%	343
1417	ATM-Dal Corporate Programs		9030	Customer accounts-Customer records and collections expenses	16	10.21%	2
1417	ATM-Dal Corporate Programs		9110	Sales-Supervision	874	10.21%	89
1417	ATM-Dal Corporate Programs		9200	A&G-Administrative & general salaries	115,102	10.21%	11,752
1417	ATM-Dal Corporate Programs		9210	A&G-Office supplies & expense	190,373	10.21%	19,437
1417	ATM-Dal Corporate Programs		9260	A&G-Employee pensions and benefits	37,684	10.21%	3,848
1417 Total					<u>0</u>		<u>0</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1420	ATM-Dallas EAPC	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(423,129)	10.21%	(43,202)
1420	ATM-Dallas EAPC		8700	Distribution-Operation supervision and engineering	1,493	10.21%	152
1420	ATM-Dallas EAPC		8740	Mains and Services Expenses	1,896	10.21%	194
1420	ATM-Dallas EAPC		9010	Customer accounts-Operation supervision	750	10.21%	77
1420	ATM-Dallas EAPC		9030	Customer accounts-Customer records and collections expenses	203	10.21%	21
1420	ATM-Dallas EAPC		9210	A&G-Office supplies & expense	69,362	10.21%	7,082
1420	ATM-Dallas EAPC		9230	A&G-Outside services employed	349,426	10.21%	35,676
1420 Total					<u>(0)</u>		<u>(0)</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1463	ATM-HR Benefit Variance	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	1,542,263	10.21%	157,465
1463	ATM-HR Benefit Variance		9260	A&G-Employee pensions and benefits	(1,542,263)	10.21%	(157,465)
1463 Total					<u>0</u>		<u>0</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1501	ATM-Dal-Legal	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(7,226,792)	10.21%	(737,855)
1501	ATM-Dal-Legal		8700	Distribution-Operation supervision and engineering	194	10.21%	20
1501	ATM-Dal-Legal		9200	A&G-Administrative & general salaries	3,818,038	10.21%	389,822
1501	ATM-Dal-Legal		9210	A&G-Office supplies & expense	105,298	10.21%	10,751
1501	ATM-Dal-Legal		9230	A&G-Outside services employed	727,462	10.21%	74,274
1501	ATM-Dal-Legal		9260	A&G-Employee pensions and benefits	2,313,190	10.21%	236,177
1501	ATM-Dal-Legal		9302	Miscellaneous general expenses	257,971	10.21%	26,339
1501	ATM-Dal-Legal		9320	A&G-Maintenance of general plant	4,640	10.21%	474
1501 Total						<u>0</u>	

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1502	ATM-Corporate Secretary	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(1,720,092)	10.21%	(175,621)
1502	ATM-Corporate Secretary		9210	A&G-Office supplies & expense	4,724	10.21%	482
1502	ATM-Corporate Secretary		9302	Miscellaneous general expenses	1,715,369	10.21%	175,139
1502 Total					<u>0</u>		<u>0</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1503	ATM-Dal-Governmental Affairs	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(768,665)	10.25%	(78,788)
1503	ATM-Dal-Governmental Affairs		8700	Distribution-Operation supervision and engineering	99	10.25%	10
1503	ATM-Dal-Governmental Affairs		9200	A&G-Administrative & general salaries	375,958	10.25%	38,536
1503	ATM-Dal-Governmental Affairs		9210	A&G-Office supplies & expense	86,574	10.25%	8,874
1503	ATM-Dal-Governmental Affairs		9260	A&G-Employee pensions and benefits	305,916	10.25%	31,356
1503	ATM-Dal-Governmental Affairs		9320	A&G-Maintenance of general plant	118	10.25%	12
1503 Total					<u>(0)</u>		<u>(0)</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1504	ATM-Dal-Central Records	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(594,391)	10.25%	(60,925)
1504	ATM-Dal-Central Records		9200	A&G-Administrative & general salaries	263,105	10.25%	26,968
1504	ATM-Dal-Central Records		9210	A&G-Office supplies & expense	65,038	10.25%	6,666
1504	ATM-Dal-Central Records		9230	A&G-Outside services employed	1,298	10.25%	133
1504	ATM-Dal-Central Records		9260	A&G-Employee pensions and benefits	86,140	10.25%	8,829
1504	ATM-Dal-Central Records		9302	Miscellaneous general expenses	35,420	10.25%	3,631
1504	ATM-Dal-Central Records		9320	A&G-Maintenance of general plant	143,390	10.25%	14,697
1504 Total					<u>(0)</u>		<u>(0)</u>

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1508	ATM-Dal-Energy Assistance	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(661,213)	12.57%	(83,115)
1508	ATM-Dal-Energy Assistance		9200	A&G-Administrative & general salaries	391,428	12.57%	49,203
1508	ATM-Dal-Energy Assistance		9210	A&G-Office supplies & expense	45,461	12.57%	5,714
1508	ATM-Dal-Energy Assistance		9230	A&G-Outside services employed	96,172	12.57%	12,089
1508	ATM-Dal-Energy Assistance		9260	A&G-Employee pensions and benefits	128,152	12.57%	16,109
1508 Total					<u>-</u>		<u>-</u>

Sub 40004

Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1821	ATM-Dal-Gas Supply Executive	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(788,206)	10.23%	(80,633)
1821	ATM-Dal-Gas Supply Executive		8810	Distribution-Rents	(1,504)	10.23%	(154)
1821	ATM-Dal-Gas Supply Executive		9200	A&G-Administrative & general salaries	264,634	10.23%	27,072
1821	ATM-Dal-Gas Supply Executive		9210	A&G-Office supplies & expense	79,109	10.23%	8,093
1821	ATM-Dal-Gas Supply Executive		9230	A&G-Outside services employed	118,310	10.23%	12,103
1821	ATM-Dal-Gas Supply Executive		9260	A&G-Employee pensions and benefits	171,820	10.23%	17,577
1821	ATM-Dal-Gas Supply Executive		9310	A&G-Rents	154,863	10.23%	15,845
1821	ATM-Dal-Gas Supply Executive		9320	A&G-Maintenance of general plant	953	10.23%	98
1821 Total					(0)		(0)
<b>Sub 40004</b>							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1822	ATM-Dal-Regional Gas Supply	Composite - WTX and MTX	9220	A&G-Administrative expense transferred-Credit	(321,461)	0.00%	-
1822	ATM-Dal-Regional Gas Supply		9200	A&G-Administrative & general salaries	217,257	0.00%	-
1822	ATM-Dal-Regional Gas Supply		9210	A&G-Office supplies & expense	9,590	0.00%	-
1822	ATM-Dal-Regional Gas Supply		9260	A&G-Employee pensions and benefits	94,614	0.00%	-
1822 Total					-		-
<b>Sub 40004</b>							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1823	ATM-Dal-Gas Contract Admin	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(423,122)	12.57%	(53,186)
1823	ATM-Dal-Gas Contract Admin		9200	A&G-Administrative & general salaries	296,554	12.57%	37,277
1823	ATM-Dal-Gas Contract Admin		9210	A&G-Office supplies & expense	5,992	12.57%	753
1823	ATM-Dal-Gas Contract Admin		9260	A&G-Employee pensions and benefits	120,576	12.57%	15,156
1823 Total					0		0
<b>Sub 40004</b>							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1825	ATM-Franklin-Gas Control & Storage	Composite - Atmos 5 and TLGP	9220	A&G-Administrative expense transferred-Credit	(522,010)	24.94%	(130,189)
1825	ATM-Franklin-Gas Control & Storage		9200	A&G-Administrative & general salaries	343,605	24.94%	85,695
1825	ATM-Franklin-Gas Control & Storage		9210	A&G-Office supplies & expense	20,298	24.94%	5,062
1825	ATM-Franklin-Gas Control & Storage		9260	A&G-Employee pensions and benefits	158,107	24.94%	39,432
1825 Total					-		-
<b>Sub 40004</b>							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1826	ATM-New Orleans-Gas Supply & Services	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(513,200)	12.57%	(64,509)
1826	ATM-New Orleans-Gas Supply & Services		8700	Distribution-Operation supervision and engineering	167	12.57%	21
1826	ATM-New Orleans-Gas Supply & Services		9200	A&G-Administrative & general salaries	228,119	12.57%	28,675
1826	ATM-New Orleans-Gas Supply & Services		9210	A&G-Office supplies & expense	90,483	12.57%	11,374
1826	ATM-New Orleans-Gas Supply & Services		9230	A&G-Outside services employed	82,000	12.57%	10,307
1826	ATM-New Orleans-Gas Supply & Services		9260	A&G-Employee pensions and benefits	112,431	12.57%	14,133
1826 Total					0		0
<b>Sub 40004</b>							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1827	ATM-Regional Supply Planning	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(810,643)	12.57%	(101,898)
1827	ATM-Regional Supply Planning		9200	A&G-Administrative & general salaries	467,158	12.57%	58,722
1827	ATM-Regional Supply Planning		9210	A&G-Office supplies & expense	181,612	12.57%	22,829
1827	ATM-Regional Supply Planning		9230	A&G-Outside services employed	18,315	12.57%	2,302
1827	ATM-Regional Supply Planning		9260	A&G-Employee pensions and benefits	143,231	12.57%	18,004
1827	ATM-Regional Supply Planning		9320	A&G-Maintenance of general plant	327	12.57%	41
1827 Total					(0)		(0)
<b>Sub 40004</b>							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1828	ATM-Jackson-West Region Gas Supply & Services	Composite - CO, KS, LA, MS	9220	A&G-Administrative expense transferred-Credit	(549,606)	0.00%	-
1828	ATM-Jackson-West Region Gas Supply & Services		9200	A&G-Administrative & general salaries	391,299	0.00%	-
1828	ATM-Jackson-West Region Gas Supply & Services		9210	A&G-Office supplies & expense	6,089	0.00%	-
1828	ATM-Jackson-West Region Gas Supply & Services		9260	A&G-Employee pensions and benefits	151,596	0.00%	-
1828	ATM-Jackson-West Region Gas Supply & Services		9320	A&G-Maintenance of general plant	622	0.00%	-
1828 Total					(0)		-
<b>Sub 40004</b>							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1829	ATM-Franklin-East Region Gas Supply & Services	KY/Mid-States Only	9220	A&G-Administrative expense transferred-Credit	(26,149)	100.00%	(26,149)
1829	ATM-Franklin-East Region Gas Supply & Services		8740	Mains and Services Expenses	26	100.00%	26
1829	ATM-Franklin-East Region Gas Supply & Services		9200	A&G-Administrative & general salaries	(63)	100.00%	(63)
1829	ATM-Franklin-East Region Gas Supply & Services		9210	A&G-Office supplies & expense	25,247	100.00%	25,247
1829	ATM-Franklin-East Region Gas Supply & Services		9260	A&G-Employee pensions and benefits	(21)	100.00%	(21)
1829	ATM-Franklin-East Region Gas Supply & Services		9320	A&G-Maintenance of general plant	960	100.00%	960
1829 Total					0		0
<b>Sub 40004</b>							

Atmos Energy Corporation  
 SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
 Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1831	ATM-Dal-Gas Supply	Mid-Tex Only	9220	A&G-Administrative expense transferred-Credit	(900,874)	0.00%	-
1831	ATM-Dal-Gas Supply		9200	A&G-Administrative & general salaries	653,698	0.00%	-
1831	ATM-Dal-Gas Supply		9210	A&G-Office supplies & expense	32,679	0.00%	-
1831	ATM-Dal-Gas Supply		9260	A&G-Employee pensions and benefits	214,021	0.00%	-
1831	ATM-Dal-Gas Supply		9320	A&G-Maintenance of general plant	477	0.00%	-
1831 Total					0		-

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1833	ATM-Corporate Gas Supply Risk Mgmt	Composite - Utility Only	9220	A&G-Administrative expense transferred-Credit	(508,145)	12.57%	(63,874)
1833	ATM-Corporate Gas Supply Risk Mgmt		9200	A&G-Administrative & general salaries	325,756	12.57%	40,949
1833	ATM-Corporate Gas Supply Risk Mgmt		9210	A&G-Office supplies & expense	40,667	12.57%	5,112
1833	ATM-Corporate Gas Supply Risk Mgmt		9230	A&G-Outside services employed	6,700	12.57%	842
1833	ATM-Corporate Gas Supply Risk Mgmt		9260	A&G-Employee pensions and benefits	135,022	12.57%	16,972
1833 Total					-		-

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1835	ATM-Franklin-Gas Control	Composite - Atmos 5 and TLGP	9220	A&G-Administrative expense transferred-Credit	(1,563,316)	24.94%	(389,891)
1835	ATM-Franklin-Gas Control		9200	A&G-Administrative & general salaries	937,910	24.94%	233,915
1835	ATM-Franklin-Gas Control		9210	A&G-Office supplies & expense	115,573	24.94%	28,824
1835	ATM-Franklin-Gas Control		9230	A&G-Outside services employed	111,957	24.94%	27,922
1835	ATM-Franklin-Gas Control		9260	A&G-Employee pensions and benefits	307,047	24.94%	76,578
1835	ATM-Franklin-Gas Control		9310	A&G-Rents	88,768	24.94%	22,139
1835	ATM-Franklin-Gas Control		9320	A&G-Maintenance of general plant	2,060	24.94%	514
1835 Total					0		0

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1836	ATM-Dal-TBS System Support	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(490,863)	10.23%	(50,215)
1836	ATM-Dal-TBS System Support		9200	A&G-Administrative & general salaries	320,538	10.23%	32,791
1836	ATM-Dal-TBS System Support		9210	A&G-Office supplies & expense	19,445	10.23%	1,989
1836	ATM-Dal-TBS System Support		9260	A&G-Employee pensions and benefits	150,880	10.23%	15,435
1836 Total					0		0

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1837	ATM-Dal-TBS Application Support	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(945,466)	10.23%	(96,721)
1837	ATM-Dal-TBS Application Support		9200	A&G-Administrative & general salaries	670,387	10.23%	68,581
1837	ATM-Dal-TBS Application Support		9210	A&G-Office supplies & expense	55,108	10.23%	5,638
1837	ATM-Dal-TBS Application Support		9260	A&G-Employee pensions and benefits	219,485	10.23%	22,453
1837	ATM-Dal-TBS Application Support		9320	A&G-Maintenance of general plant	485	10.23%	50
1837 Total					0		0

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1838	ATM-Dal-TBS Technical Support	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(1,136,993)	10.23%	(116,314)
1838	ATM-Dal-TBS Technical Support		9200	A&G-Administrative & general salaries	837,276	10.23%	85,653
1838	ATM-Dal-TBS Technical Support		9210	A&G-Office supplies & expense	25,361	10.23%	2,594
1838	ATM-Dal-TBS Technical Support		9260	A&G-Employee pensions and benefits	274,124	10.23%	28,043
1838	ATM-Dal-TBS Technical Support		9320	A&G-Maintenance of general plant	231	10.23%	24
1838 Total					0		0

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1839	ATM-Dal-TBS Transportation & Scheduling	Composite - Regulated and TLGP	9220	A&G-Administrative expense transferred-Credit	(329,624)	10.23%	(33,721)
1839	ATM-Dal-TBS Transportation & Scheduling		9200	A&G-Administrative & general salaries	245,820	10.23%	25,147
1839	ATM-Dal-TBS Transportation & Scheduling		9210	A&G-Office supplies & expense	3,323	10.23%	340
1839	ATM-Dal-TBS Transportation & Scheduling		9260	A&G-Employee pensions and benefits	80,481	10.23%	8,233
1839 Total					0		0

Sub 40004							
Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1901	ATM-Dallas Employee Relocation Exp	Composite / Customer	9220	A&G-Administrative expense transferred-Credit	(73,104)	10.23%	(7,475)
1901	ATM-Dallas Employee Relocation Exp		8700	Distribution-Operation supervision and engineering	71,629	10.23%	7,325
1901	ATM-Dallas Employee Relocation Exp		9210	A&G-Office supplies & expense	1,475	10.23%	151
1901 Total					0		0

Sub 40004

Atmos Energy Corporation  
 SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
 Fiscal 2020

Cost Center	Cost Center Description	Factor Used	Account	Account Description	Fiscal 2020	Allocation %	Billed to KY-MidSt Div
1903	ATM-Dal-Controller Misc	Not Allocated to Business Units	8700	Distribution-Operation supervision and engineering	178,566	N/A	-
1903	ATM-Dal-Controller Misc		9200	A&G-Administrative & general salaries	(973,358)	N/A	-
1903	ATM-Dal-Controller Misc		9210	A&G-Office supplies & expense	204,229	N/A	-
1903	ATM-Dal-Controller Misc		9230	A&G-Outside services employed	(1,143,976)	N/A	-
1903	ATM-Dal-Controller Misc		9250	A&G-Injuries & damages	(400,000)	N/A	-
1903	ATM-Dal-Controller Misc		9260	A&G-Employee pensions and benefits	1,610,445	N/A	-
1903	ATM-Dal-Controller Misc		9302	Miscellaneous general expenses	3,676,901	N/A	-
1903 Total					<u>3,152,807</u>		<u>-</u>
Sub 40004							
Billed to KY-MidSt Div							
1904	ATM-Dallas Performance Plan	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(15,160,467)	10.21%	(1,547,884)
1904	ATM-Dallas Performance Plan		9260	A&G-Employee pensions and benefits	15,160,467	10.21%	1,547,884
1904 Total					<u>(0)</u>		<u>(0)</u>
Sub 40004							
Billed to KY-MidSt Div							
1905	ATM-Outside Director Retirement Cost	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(2,647,076)	10.21%	(270,266)
1905	ATM-Outside Director Retirement Cost		9302	Miscellaneous general expenses	2,647,076	10.21%	270,266
1905 Total					<u>-</u>		<u>-</u>
Sub 40004							
Billed to KY-MidSt Div							
1908	ATM-Dallas SEBP	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(11,360,392)	10.21%	(1,159,896)
1908	ATM-Dallas SEBP		9230	A&G-Outside services employed	269,747	10.21%	27,541
1908	ATM-Dallas SEBP		9260	A&G-Employee pensions and benefits	11,090,645	10.21%	1,132,355
1908 Total					<u>0</u>		<u>0</u>
Sub 40004							
Billed to KY-MidSt Div							
1910	ATM-Corporate Overhead Capitalized	OH Rate Based on Composite	9220	A&G-Administrative expense transferred-Credit	86,055,196	10.33%	8,889,502
1910	ATM-Corporate Overhead Capitalized		8740	Mains and Services Expenses	(28)	10.33%	(3)
1910	ATM-Corporate Overhead Capitalized		9200	A&G-Administrative & general salaries	(86,055,168)	10.33%	(8,889,499)
1910 Total					<u>(0)</u>		<u>(0)</u>
Sub 40004							
Billed to KY-MidSt Div							
1913	ATM-Dal-Fleet Management	Composite - Regulated Only	9220	A&G-Administrative expense transferred-Credit	(761,718)	10.25%	(78,076)
1913	ATM-Dal-Fleet Management		8740	Mains and Services Expenses	(1,950)	10.25%	(200)
1913	ATM-Dal-Fleet Management		8800	Distribution-Other expenses	2,788	10.25%	286
1913	ATM-Dal-Fleet Management		9030	Customer accounts-Customer records and collections expenses	700	10.25%	72
1913	ATM-Dal-Fleet Management		9200	A&G-Administrative & general salaries	563,276	10.25%	57,736
1913	ATM-Dal-Fleet Management		9210	A&G-Office supplies & expense	12,188	10.25%	1,249
1913	ATM-Dal-Fleet Management		9230	A&G-Outside services employed	300	10.25%	31
1913	ATM-Dal-Fleet Management		9260	A&G-Employee pensions and benefits	184,416	10.25%	18,903
1913 Total					<u>0</u>		<u>0</u>
Sub 40004							
Billed to KY-MidSt Div							
1915	ATM-Dallas Insurance	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(27,301,766)	10.21%	(2,788,150)
1915	ATM-Dallas Insurance		9240	A&G-Property insurance	193,588	10.21%	19,770
1915	ATM-Dallas Insurance		9250	A&G-Injuries & damages	27,108,179	10.21%	2,768,380
1915 Total					<u>0</u>		<u>0</u>
Sub 40004							
Billed to KY-MidSt Div							
1953	ATM-Dallas Enterprise Team Meeting	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(121,904)	10.21%	(12,446)
1953	ATM-Dallas Enterprise Team Meeting		9210	A&G-Office supplies & expense	121,904	10.21%	12,446
1953 Total					<u>0</u>		<u>0</u>
Sub 40004							
Billed to KY-MidSt Div							
1954	ATM-Dallas Culture Council	Composite - Total Company	9220	A&G-Administrative expense transferred-Credit	(755)	10.21%	(77)
1954	ATM-Dallas Culture Council		8700	Distribution-Operation supervision and engineering	636	10.21%	65
1954	ATM-Dallas Culture Council		9210	A&G-Office supplies & expense	119	10.21%	12
1954 Total					<u>(0)</u>		<u>(0)</u>



Atmos Energy Corporation  
SSU O&M By Cost Center Allocated to Kentucky/Mid-States Division  
Fiscal 2020

Summary by FERC Account		
Account	Account Description	Allocated to KY/Mid-States Division
8210	Storage-Purification expenses	-
8230	Gas losses	-
8560	Mains expenses	-
8700	Distribution-Operation supervision and engineering	10,533
8740	Mains and Services Expenses	18,231
8750	Distribution-Measuring and regulating station expenses	10
8800	Distribution-Other expenses	2,048
8810	Distribution-Rents	539
8850	Distribution-Maintenance supervision and engineering	-
9010	Customer accounts-Operation supervision	468,493
9020	Customer accounts-Meter reading expenses	-
9030	Customer accounts-Customer records and collections expenses	2,324,658
9100	Customer service-Miscellaneous customer service	92
9110	Sales-Supervision	398
9120	Sales-Demonstrating and selling expenses	10,807
9160	Sales-Miscellaneous sales expenses	-
9200	A&G-Administrative & general salaries	(3,168,946)
9210	A&G-Office supplies & expense	4,389,642
9230	A&G-Outside services employed	1,379,913
9240	A&G-Property insurance	19,770
9250	A&G-Injuries & damages	2,774,057
9260	A&G-Employee pensions and benefits	6,513,023
9302	Miscellaneous general expenses	596,357
9310	A&G-Rents	660,549
9320	A&G-Maintenance of general plant	29,920
		<u>16,030,092</u>

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-35**  
**Page 1 of 1**

**REQUEST:**

Refer to the allocation percentages shown on Exhibit JTC-1 for the 2020 fiscal year based on cost data for the twelve months ended September 30, 2020.

- a. Provide the number of employees for each division/nonregulated affiliate shown on Exhibit JTC-1 for each month from October 2017 through the most recent month for which actual information is available and all budget/forecast months thereafter through the end of the test year. This request includes information related to each of the divisions that make up the Mid States Division. Provide in electronic format with all formulas intact.
- b. Provide total operating expenses, excluding income taxes, for each division/nonregulated affiliate shown on Exhibit JTC-1 for each month from January 2017 through the most recent month for which actual information is available and all budget/forecast months thereafter through the end of the test year. This request includes information related to each of the divisions that make up the Mid States Division. Provide in electronic format with all formulas intact.

**RESPONSE:**

- a. Please see Attachment 1. Employee headcount projections by division have not been made after the Fiscal 2021 budget.
- b. Please see Attachment 2. Total operating expense projections by division have not been made after the Fiscal 2021 budget.

**ATTACHMENTS:**

ATTACHMENT 1 - AG\_1-35\_Att1 - Number of Employees.xlsx, 1 Page

ATTACHMENT 2 - AG\_1-35\_Att2 - Total Operating Expenses.xlsx, 33 Pages

Respondent: Michelle Faulk

Atmos Energy Corporation  
Employee Count Per Business Unit  
For Oct-17 thru Jul-21 Actuals and Aug-Sep21 Budget

Month	West Texas	CO/KS	Louisiana (007 and 077)	Kentucky- Mid-States	Mississippi	Mid-Tex	Atmos Pipeline Texas	Total
Oct-17	341	290	401	375	320	1,696	61	3,484
Nov-17	342	290	400	375	318	1,700	61	3,486
Dec-17	336	283	396	373	318	1,698	61	3,465
Jan-18	333	284	394	365	318	1,699	62	3,455
Feb-18	338	290	397	366	318	1,703	62	3,474
Mar-18	335	291	390	365	320	1,701	62	3,464
Apr-18	333	293	388	363	323	1,697	62	3,459
May-18	333	297	388	363	325	1,707	62	3,475
Jun-18	332	295	387	365	325	1,717	63	3,484
Jul-18	335	297	390	368	325	1,746	64	3,525
Aug-18	336	298	393	366	330	1,765	64	3,552
Sep-18	337	298	393	367	332	1,777	64	3,568
Oct-18	338	300	394	366	331	1,711	126	3,566
Nov-18	337	296	393	366	330	1,713	127	3,562
Dec-18	336	298	388	364	326	1,710	126	3,548
Jan-19	336	297	389	367	323	1,729	126	3,567
Feb-19	335	300	390	369	322	1,746	125	3,587
Mar-19	334	297	394	367	322	1,796	123	3,633
Apr-19	339	301	398	368	320	1,802	123	3,651
May-19	342	299	397	370	319	1,813	124	3,664
Jun-19	341	302	394	368	319	1,806	128	3,658
Jul-19	341	303	392	369	322	1,806	130	3,663
Aug-19	342	300	391	373	328	1,806	131	3,671
Sep-19	344	302	392	375	328	1,794	131	3,666
Oct-19	342	304	390	375	326	1,797	131	3,665
Nov-19	345	304	388	374	322	1,800	131	3,664
Dec-19	341	302	386	374	318	1,804	128	3,653
Jan-20	345	299	385	378	320	1,810	130	3,667
Feb-20	351	303	387	380	318	1,824	128	3,691
Mar-20	350	305	383	380	317	1,834	129	3,698
Apr-20	346	307	382	376	317	1,834	128	3,690
May-20	346	306	378	373	315	1,831	127	3,676
Jun-20	344	305	375	371	316	1,821	128	3,660
Jul-20	341	303	374	367	316	1,816	127	3,644
Aug-20	335	304	370	367	315	1,811	127	3,629
Sep-20	334	302	368	366	316	1,798	127	3,611
Oct-20	333	297	371	364	316	1,803	130	3,614
Nov-20	330	296	370	364	316	1,800	131	3,607
Dec-20	330	295	363	361	315	1,781	129	3,574
Jan-21	329	296	361	360	313	1,781	129	3,569
Feb-21	329	293	360	358	312	1,790	129	3,571
Mar-21	327	296	363	359	310	1,801	130	3,586
Apr-21	330	294	361	360	311	1,802	128	3,586
May-21	333	299	364	360	312	1,825	129	3,622
Jun-21	332	298	362	358	318	1,816	130	3,614
Jul-21	335	299	362	358	316	1,814	106	3,590
Aug-21-Budget	364	305	414	383	344	1,853	129	3,792
Sep-21-Budget	364	305	414	383	344	1,853	129	3,792

**Atmos Energy - West Texas**  
**Total Direct Operating Expenses**  
**January 2017 - July 2021 and August-September Budget 2021**

Line No.		Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18
1	<b>Operating Expenses</b>																					
2	Direct Expenses	2,433,344	2,346,112	2,701,430	2,402,956	2,622,476	2,414,055	2,341,760	3,008,262	3,187,724	2,664,742	2,803,410	2,735,619	2,721,908	2,238,820	2,712,404	2,456,159	2,830,380	2,520,415	2,774,504	3,174,624	3,381,793
3	Bad Debt Expense	64,830	52,332	43,689	39,301	33,686	32,234	34,634	32,837	903,391	36,517	46,207	58,795	64,493	55,658	46,580	36,723	33,359	215,201	33,218	32,894	893,517
4	Depreciation and Amortization	2,190,305	2,195,552	2,262,320	2,262,281	2,259,062	2,247,176	2,231,118	2,240,088	2,291,298	2,268,215	2,268,204	2,825,667	2,372,025	2,376,236	2,380,860	2,385,711	2,390,417	2,486,136	2,453,350	2,455,955	2,413,233
5	Total Taxes - Other Than Income Taxes	2,850,968	2,135,554	1,816,007	1,394,218	2,369,038	2,040,012	1,476,650	1,433,879	1,404,421	1,482,138	1,933,713	2,219,072	2,628,868	2,242,340	1,983,020	1,955,488	1,825,162	1,749,170	1,480,234	1,508,342	1,507,457
6		<u>7,539,448</u>	<u>6,729,550</u>	<u>6,823,446</u>	<u>6,098,756</u>	<u>7,284,263</u>	<u>6,733,477</u>	<u>6,084,162</u>	<u>6,715,066</u>	<u>7,786,833</u>	<u>6,451,612</u>	<u>7,051,535</u>	<u>7,839,153</u>	<u>7,787,293</u>	<u>6,913,055</u>	<u>7,122,865</u>	<u>6,834,081</u>	<u>7,079,317</u>	<u>6,970,923</u>	<u>6,741,306</u>	<u>7,171,815</u>	<u>8,196,000</u>

Line No.	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	
1																											
2	2,682,833	2,722,528	3,002,681	2,907,055	2,742,762	3,051,227	2,907,812	2,857,042	3,345,012	3,917,553	3,572,603	3,397,185	2,528,851	2,535,264	2,910,872	2,909,238	2,587,634	3,379,873	2,769,333	2,695,033	2,838,680	3,095,605	2,801,045	2,477,329	2,343,504	2,421,470	
3	74,113	95,189	121,827	126,534	109,767	182,383	79,683	76,134	371,260	72,297	71,289	(67,006)	124,927	159,097	209,647	213,236	189,561	165,692	132,611	121,213	(51,428)	106,728	941,440	475,289	180,640	242,713	
4	2,565,284	2,579,678	2,585,606	2,506,123	2,595,300	2,595,477	2,598,837	2,695,423	2,718,456	2,746,937	2,763,301	2,802,287	2,865,377	2,871,347	2,866,182	2,865,295	2,870,608	2,883,128	2,890,491	2,937,208	2,946,605	2,950,399	2,956,672	3,144,943	3,113,508	3,120,673	
5	1,612,933	1,982,480	1,935,775	2,434,992	2,210,947	2,113,386	1,957,387	1,810,231	1,773,071	1,423,248	1,443,603	1,405,341	1,738,071	2,212,199	2,171,377	2,476,684	2,268,890	1,488,132	1,975,515	1,896,696	1,797,207	1,757,580	1,666,893	1,852,355	1,905,865	2,166,541	
6	6,935,163	7,379,875	7,645,889	7,974,704	7,658,776	7,942,473	7,543,719	7,438,830	8,207,799	8,160,035	7,850,796	7,537,806	7,257,226	7,777,907	8,158,078	8,464,453	7,916,693	7,916,825	7,767,950	7,650,150	7,531,064	7,910,311	8,366,050	7,949,916	7,543,517	7,951,398	

Line No.	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Budget Aug-21	Budget Sep-21
1										
2	2,608,838	2,343,807	2,596,682	3,001,960	2,775,789	2,826,429	3,187,572	3,428,496	2,680,445	3,166,511
3	332,897	319,925	362,989	521,789	935,123	721,037	108,723	302,274	117,909	117,815
4	3,223,446	3,231,186	3,233,361	3,238,704	3,245,867	3,250,693	3,394,578	3,390,863	3,369,086	3,380,365
5	2,780,516	2,960,099	2,878,474	2,698,877	2,439,717	1,676,132	2,014,488	1,844,694	1,741,298	1,730,166
6	8,945,697	8,855,017	9,071,506	9,461,331	9,396,496	8,474,291	8,705,360	8,966,327	7,908,738	8,394,857

**Atmos Energy - Colorado/Kansas**  
**Total Direct Operating Expenses**  
**January 2017 - July 2021 and August-September Budget 2021**

Line No.		Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	
1	<b>Operating Expenses</b>																						
2	Direct Expenses	2,268,699	1,848,275	2,507,972	2,220,077	2,361,928	2,139,117	2,316,393	1,994,835	2,517,527	1,966,430	2,012,253	2,064,934	2,331,039	2,019,810	2,271,613	2,683,295	2,570,258	2,281,824	2,833,018	2,292,139	2,217,660	
3	Bad Debt Expense	153,368	110,809	100,029	78,458	59,510	53,175	52,309	50,678	(297,178)	70,499	106,438	133,157	153,666	135,036	111,889	81,207	60,859	333,104	51,390	49,331	(303,614)	
4	Depreciation and Amortization	1,761,977	1,739,885	1,754,722	1,763,870	1,768,257	1,779,627	1,788,699	1,831,108	1,928,989	1,838,960	1,841,364	1,847,075	1,850,556	1,852,042	1,854,504	1,860,350	1,876,670	1,881,919	1,883,833	1,893,289	1,965,124	
5	Total Taxes - Other Than Income Taxes	949,680	915,484	872,510	888,376	851,131	810,362	833,721	840,154	820,125	859,252	1,017,670	974,542	1,064,109	1,120,964	945,647	1,041,277	949,521	910,957	918,510	870,720	866,178	
6		<u>5,133,724</u>	<u>4,614,453</u>	<u>5,235,233</u>	<u>4,950,781</u>	<u>5,040,825</u>	<u>4,782,282</u>	<u>4,991,123</u>	<u>4,716,775</u>	<u>4,969,463</u>	<u>4,735,141</u>	<u>4,977,726</u>	<u>5,019,709</u>	<u>5,399,369</u>	<u>5,127,852</u>	<u>5,183,653</u>	<u>5,666,129</u>	<u>5,457,307</u>	<u>5,407,804</u>	<u>5,686,751</u>	<u>5,105,479</u>	<u>4,745,348</u>	

Line No.	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	
1																											
2	2,035,358	2,007,811	2,037,832	2,610,719	2,357,536	2,175,180	2,419,751	2,845,438	2,698,233	2,849,703	3,109,797	3,668,746	2,065,804	2,575,746	2,337,860	2,783,465	2,181,995	2,730,981	2,225,082	2,233,548	2,396,726	2,373,345	2,476,844	2,085,158	2,003,467	2,078,964	
3	64,088	102,423	139,705	144,387	142,558	244,682	81,518	76,407	279,142	55,287	58,092	(564,313)	63,590	93,452	122,935	123,082	115,934	96,604	70,141	51,456	3,896	39,834	862,358	193,342	90,916	125,872	
4	1,917,682	1,922,433	1,928,943	1,929,785	1,948,756	1,932,400	1,906,168	1,911,712	1,922,153	1,968,861	2,024,490	2,027,980	1,990,701	2,002,109	2,012,496	2,014,901	2,019,756	2,060,160	2,016,820	2,023,356	2,045,421	2,087,761	2,132,942	2,155,786	2,108,280	2,113,878	
5	894,211	1,160,469	1,005,644	1,175,231	1,176,139	1,204,183	1,047,930	950,304	926,039	961,927	929,034	909,944	959,183	1,234,900	994,136	1,335,316	1,261,439	1,162,908	1,156,126	1,297,686	1,092,002	1,186,043	1,086,795	1,192,406	1,089,315	1,272,606	
6	4,911,339	5,193,136	5,112,124	5,860,122	5,624,989	5,556,445	5,455,367	5,783,861	5,825,567	5,835,778	6,121,413	6,042,357	5,079,279	5,906,207	5,467,428	6,256,764	5,579,123	6,050,653	5,468,169	5,606,046	5,538,046	5,686,983	6,558,939	5,626,692	5,291,978	5,591,320	



Line No.	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Budget Aug-21	Budget Sep-21
1										
2	2,359,837	2,182,748	2,320,445	2,429,879	2,835,220	2,411,525	2,622,227	3,458,501	2,408,142	2,384,427
3	196,006	192,060	217,462	318,798	527,592	324,799	50,987	130,980	47,030	48,354
4	2,125,599	2,130,195	2,134,712	2,136,694	2,142,149	2,159,460	2,170,256	2,197,383	2,214,292	2,312,923
5	1,394,951	1,541,846	1,294,211	1,107,648	1,154,859	1,168,242	1,104,944	1,159,668	1,135,237	1,121,789
6	<u>6,076,393</u>	<u>6,046,850</u>	<u>5,966,830</u>	<u>5,993,019</u>	<u>6,659,820</u>	<u>6,064,026</u>	<u>5,948,414</u>	<u>6,946,532</u>	<u>5,804,701</u>	<u>5,867,493</u>

**Atmos Energy - Louisiana**  
**Total Direct Operating Expenses**  
**January 2017 - July 2021 and August-September Budget 2021**

Line No.		Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	
1	<b>Operating Expenses</b>																						
2	Direct Expenses	2,546,473	2,166,263	2,743,906	2,199,626	2,481,216	2,175,498	2,552,857	3,135,987	3,190,066	2,349,598	2,514,624	2,500,326	2,504,926	2,491,809	2,564,944	2,298,435	2,602,453	2,530,472	3,185,631	3,147,176	3,058,686	
3	Bad Debt Expense	178,383	124,335	93,896	85,756	76,949	77,343	71,455	68,619	604,985	83,837	106,449	169,842	235,689	139,098	114,365	92,892	73,632	463,440	68,735	64,845	320,508	
4	Depreciation and Amortization	2,441,654	2,443,320	2,446,439	2,520,542	2,534,123	2,539,610	2,613,806	2,641,574	767,326	2,319,098	2,321,950	2,325,748	2,316,740	2,318,802	2,316,379	2,317,218	2,357,116	2,373,711	2,486,619	2,438,339	2,365,894	
5	Total Taxes - Other Than Income Taxes	1,315,034	1,161,019	1,218,812	1,211,382	1,227,026	1,205,094	1,196,822	1,218,766	1,213,379	1,251,994	1,448,712	1,219,261	1,380,599	1,351,623	1,382,720	1,369,395	1,366,729	1,345,538	1,344,759	1,353,011	1,323,794	
6		6,481,544	5,894,937	6,503,053	6,017,306	6,319,314	5,997,545	6,434,941	7,064,946	5,775,756	6,004,528	6,391,735	6,215,177	6,437,954	6,301,332	6,378,407	6,077,940	6,399,930	6,713,161	7,085,743	7,003,371	7,068,881	

Line No.	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	
1																											
2	2,527,940	2,532,769	2,710,977	3,462,108	2,617,810	2,744,849	2,950,185	2,714,657	3,247,899	3,495,256	3,331,558	3,285,564	2,989,419	3,083,131	2,745,765	3,048,405	2,623,849	3,102,582	2,574,284	2,623,323	2,624,228	2,964,665	3,106,589	4,573,674	2,883,967	2,821,249	
3	73,777	127,227	174,299	180,148	125,381	247,846	80,232	77,459	360,581	70,320	66,322	(55,022)	112,895	179,397	248,921	264,741	199,337	140,192	111,731	98,437	134,147	103,704	778,149	479,874	164,668	222,333	
4	2,441,502	2,445,556	2,462,171	2,468,041	2,462,761	2,330,378	2,472,516	2,480,122	2,489,560	2,577,733	2,586,721	2,642,722	2,607,066	2,615,674	2,613,931	2,613,342	2,604,899	2,647,933	2,623,363	2,625,703	2,633,559	2,807,206	2,823,286	2,824,353	2,846,118	2,827,902	
5	1,395,816	1,613,273	1,316,592	1,519,788	1,484,249	1,507,691	1,506,947	1,455,002	1,477,203	1,457,230	1,499,183	1,461,280	1,502,119	1,754,135	1,336,795	1,704,277	1,737,494	2,013,005	1,690,771	1,689,741	1,621,374	1,706,488	1,629,407	1,770,205	1,630,379	1,686,303	
6	6,439,035	6,718,825	6,664,039	7,630,085	6,690,201	6,830,764	7,009,880	6,727,240	7,575,243	7,600,539	7,483,785	7,334,544	7,211,499	7,632,337	6,945,412	7,630,766	7,165,579	7,903,711	7,000,149	7,037,203	7,013,308	7,582,063	8,337,430	9,648,106	7,525,133	7,557,787	

Line No.	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Budget Aug-21	Budget Sep-21
1										
2	3,385,605	2,747,368	2,683,118	2,754,034	2,845,340	2,672,462	3,193,380	3,086,242	2,724,536	2,714,606
3	385,181	364,137	430,803	580,481	908,975	638,574	123,532	350,129	116,681	114,492
4	2,836,239	2,833,307	2,836,528	2,831,846	2,831,226	2,845,719	2,863,836	3,193,079	3,084,921	3,109,606
5	1,550,834	1,998,024	1,787,347	1,768,187	1,813,578	1,781,929	1,781,474	1,821,068	1,745,565	1,745,565
6	8,157,860	7,942,836	7,737,795	7,934,348	8,399,118	7,938,684	7,962,221	8,450,518	7,671,703	7,684,269

**Atmos Energy - Kentucky/Mid-States**  
**Total Direct Operating Expenses**  
**January 2017 - July 2021 and August-September Budget 2021**

Line No.		Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18
1	<b>Operating Expenses</b>																					
2	Direct Expenses	2,872,516	2,825,264	3,508,249	2,816,813	3,173,023	2,498,613	3,774,832	3,463,056	3,652,648	2,394,011	3,186,623	3,095,756	3,389,643	2,650,554	3,301,458	3,086,043	3,368,985	3,770,181	3,174,754	3,705,454	3,368,006
3	Bad Debt Expense	96,260	75,161	66,393	52,577	43,821	43,015	44,708	41,641	558,031	51,656	67,961	86,828	98,216	87,386	75,100	111,909	43,718	297,320	45,977	44,549	535,742
4	Depreciation and Amortization	2,727,232	2,735,121	2,750,342	2,779,088	2,788,794	2,809,415	2,842,314	2,924,129	3,093,078	2,921,397	2,929,188	2,940,756	2,951,178	2,952,029	2,961,503	2,978,734	2,995,359	3,011,886	2,993,420	3,177,480	3,266,639
5	Total Taxes - Other Than Income Taxes	1,344,896	1,147,894	1,158,311	1,057,413	1,029,167	1,066,821	984,065	981,392	2,489,098	1,133,680	1,370,010	1,161,195	1,398,046	870,171	1,283,316	1,257,607	1,369,655	1,181,771	1,182,631	1,237,843	1,179,968
6		<u>7,040,904</u>	<u>6,783,440</u>	<u>7,483,295</u>	<u>6,705,891</u>	<u>7,034,805</u>	<u>6,417,863</u>	<u>7,645,918</u>	<u>7,410,218</u>	<u>9,792,855</u>	<u>6,500,744</u>	<u>7,553,782</u>	<u>7,284,535</u>	<u>7,837,083</u>	<u>6,560,139</u>	<u>7,621,377</u>	<u>7,434,293</u>	<u>7,777,717</u>	<u>8,261,158</u>	<u>7,396,782</u>	<u>8,165,327</u>	<u>8,350,355</u>

Line No.	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	
1																											
2	2,951,101	3,581,377	2,767,905	3,548,566	2,986,733	3,253,880	3,563,357	3,489,965	3,440,532	3,919,300	4,404,197	4,752,196	3,499,469	3,625,496	3,286,994	3,881,628	2,634,368	3,593,168	2,657,421	3,172,410	2,978,420	3,625,119	3,389,729	3,508,375	3,151,361	2,684,039	
3	56,146	76,002	102,590	106,430	99,595	164,574	60,851	51,740	256,635	50,803	49,452	297,671	92,336	119,978	156,156	173,742	151,033	133,928	102,369	81,088	(115,578)	71,829	723,013	200,510	125,635	167,441	
4	3,099,062	3,102,587	3,119,433	3,133,250	3,136,915	3,156,689	3,175,532	2,939,185	2,962,557	2,979,227	3,063,923	3,543,028	3,114,422	3,120,871	3,128,776	3,134,636	3,136,743	3,051,568	3,164,161	3,173,253	3,197,647	3,219,905	3,280,557	3,341,011	3,243,640	3,241,089	
5	1,287,482	1,537,434	1,289,479	1,562,767	1,553,791	1,539,082	1,571,320	1,515,558	1,442,556	1,139,947	1,151,761	1,126,975	1,414,299	1,732,220	1,370,721	1,665,930	1,563,004	2,156,806	1,504,441	1,493,078	1,411,265	1,462,164	1,422,771	1,558,272	1,295,649	1,391,934	
6	7,393,791	8,297,400	7,279,407	8,351,013	7,777,034	8,114,225	8,371,060	7,996,448	8,102,280	8,089,277	8,669,334	9,719,870	8,120,526	8,598,565	7,942,647	8,855,936	7,485,149	8,935,471	7,428,392	7,919,829	7,471,754	8,379,016	8,816,069	8,608,167	7,816,286	7,484,503	

Line No.	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Budget Aug-21	Budget Sep-21
1										
2	3,831,452	3,161,731	3,134,520	3,433,289	3,371,683	3,202,300	3,493,313	3,968,972	3,418,080	3,500,295
3	233,682	234,078	259,241	388,594	649,215	426,256	87,635	233,557	83,872	88,233
4	3,254,695	3,256,985	3,256,469	3,266,494	3,274,013	3,283,289	3,337,335	3,347,498	3,370,326	3,466,368
5	1,365,344	1,819,856	1,640,611	1,711,395	1,578,757	1,557,519	1,545,213	1,639,421	1,551,664	1,590,022
6	8,685,174	8,472,651	8,290,841	8,799,773	8,873,668	8,469,363	8,463,495	9,189,448	8,423,943	8,644,918

**Atmos Energy - Mississippi**  
**Total Direct Operating Expenses**  
**January 2017 - July 2021 and August-September Budget 2021**

Line No.	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18
1	<b>Operating Expenses</b>																				
2	2,998,403	2,364,384	2,983,793	2,326,811	2,929,266	3,206,755	2,796,925	2,894,956	3,548,388	2,159,380	2,440,293	2,103,671	2,678,696	2,332,558	3,275,982	2,375,820	3,179,681	2,652,774	2,526,027	3,190,741	3,073,176
3	201,257	127,463	89,966	77,323	56,336	53,393	51,726	49,865	884,571	68,097	105,618	173,929	220,671	151,460	120,517	75,832	62,546	310,863	44,243	41,192	756,204
4	1,355,065	1,392,618	1,399,921	1,410,207	1,424,479	1,443,146	1,482,322	1,507,554	1,626,798	1,514,401	1,519,076	1,523,151	1,529,290	1,536,129	1,540,684	1,557,508	1,578,842	1,603,296	1,625,693	1,652,402	1,714,365
5	1,909,270	1,639,504	1,574,417	1,447,611	1,419,930	1,468,305	1,378,382	1,386,021	1,388,398	1,208,194	1,436,095	1,379,816	1,830,567	1,947,717	1,654,804	1,505,780	1,546,698	1,345,958	1,344,126	1,358,873	1,328,198
6	6,463,995	5,523,969	6,048,096	5,261,952	5,830,011	6,171,600	5,709,355	5,838,396	7,448,156	4,950,072	5,501,082	5,180,567	6,259,224	5,967,865	6,591,987	5,514,941	6,367,767	5,912,891	5,540,090	6,243,208	6,871,943



Line No.	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	
1																											
2	2,670,057	2,689,497	2,209,344	2,750,306	2,872,790	3,107,428	2,903,991	3,385,040	3,017,097	3,266,102	3,237,318	3,323,663	2,750,626	2,905,142	2,533,679	2,673,712	2,420,823	2,949,544	2,509,733	2,683,553	2,180,019	2,690,665	2,883,416	3,638,362	2,399,892	2,465,489	
3	94,142	191,014	303,513	298,035	228,838	362,778	102,202	73,158	341,257	61,804	59,776	338,145	119,968	216,127	323,822	328,923	254,827	204,840	118,452	96,453	101,426	70,030	2,205,445	537,711	177,350	289,076	
4	1,669,894	1,679,543	1,678,109	1,667,390	1,666,164	1,682,729	1,725,341	1,733,676	1,733,561	1,757,163	1,795,661	1,915,167	1,815,704	1,809,680	1,810,726	1,815,006	1,839,068	1,858,546	1,848,089	1,851,627	1,837,447	1,861,765	1,960,115	2,132,312	1,966,681	1,976,595	
5	1,418,554	1,642,025	1,705,666	2,029,410	2,084,200	1,889,951	1,917,897	1,637,539	1,569,847	1,523,659	1,569,321	1,528,205	1,653,438	1,957,189	1,742,302	2,179,524	2,185,367	2,448,508	1,960,141	1,857,658	1,706,314	1,817,419	1,749,766	1,845,860	1,801,133	1,879,118	
6	5,852,647	6,202,079	5,896,632	6,745,141	6,851,992	7,042,886	6,649,431	6,829,413	6,661,762	6,608,728	6,662,076	7,105,180	6,339,735	6,888,137	6,410,529	6,997,164	6,700,085	7,461,438	6,436,414	6,489,291	5,825,205	6,439,880	8,798,741	8,154,245	6,345,056	6,610,279	

Line No.	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Budget Aug-21	Budget Sep-21
1										
2	2,952,841	2,670,898	2,314,857	2,981,430	2,700,029	2,876,438	2,745,335	3,388,587	2,786,597	2,827,078
3	494,478	506,565	581,552	817,684	1,068,868	536,680	106,272	306,499	92,217	94,577
4	1,977,298	1,986,595	1,996,206	2,027,044	2,026,541	2,017,615	2,053,149	2,074,258	2,229,424	2,331,042
5	2,168,368	2,590,658	2,400,606	2,337,524	2,213,671	1,931,705	1,834,505	1,880,828	1,932,073	1,921,655
6	<u>7,692,985</u>	<u>7,754,716</u>	<u>7,293,221</u>	<u>8,163,681</u>	<u>8,009,109</u>	<u>7,362,437</u>	<u>6,739,260</u>	<u>7,650,171</u>	<u>7,040,311</u>	<u>7,174,352</u>

**Atmos Energy - Mid-Tex**  
**Total Direct Operating Expenses**  
**January 2017 - July 2021 and August-September Budget 2021**

Line No.	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18
1	<b>Operating Expenses</b>																		
2	9,623,048	8,971,321	10,177,403	9,263,270	10,234,345	11,092,394	9,464,322	10,368,354	13,134,158	9,755,738	13,446,240	12,633,816	10,259,579	10,588,064	11,080,823	9,113,952	11,447,569	10,480,861	8,898,631
3	488,962	430,308	371,101	324,284	312,827	312,747	297,451	301,625	1,499,217	323,783	388,555	491,519	580,150	502,690	397,957	311,533	310,005	1,920,142	289,384
4	9,833,224	9,835,373	9,848,985	9,864,369	9,873,884	10,503,489	10,588,524	10,656,828	10,605,755	10,672,643	10,674,993	10,682,747	10,697,186	10,816,165	10,826,080	10,842,388	10,874,445	10,933,402	10,986,038
5	13,341,480	10,959,572	11,138,967	7,476,758	17,205,048	12,335,807	8,803,821	8,969,016	8,814,646	9,543,448	11,129,520	14,141,977	16,457,155	13,607,370	11,740,160	16,217,723	14,824,325	13,539,882	9,891,538
6	33,286,714	30,196,574	31,536,457	26,928,681	37,626,103	34,244,437	29,154,118	30,295,822	34,053,776	30,295,612	35,639,307	37,950,059	37,994,070	35,514,289	34,045,020	36,485,596	37,456,344	36,874,288	30,065,591

Line No.	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	
1																								
2	12,273,829	11,843,505	10,835,072	10,709,087	10,688,525	11,391,180	9,996,637	13,154,170	11,837,221	11,827,705	11,547,949	12,552,630	10,376,673	19,487,470	10,583,428	11,884,272	11,308,097	12,074,820	11,655,721	12,309,961	12,170,238	10,966,698	11,900,710	
3	276,669	820,134	417,300	480,281	649,827	667,224	610,799	969,957	421,655	409,129	2,103,578	394,825	379,624	2,742,915	422,467	503,431	694,857	710,804	645,878	574,291	423,066	405,347	(399,521)	
4	11,057,440	10,315,285	11,420,779	11,429,063	11,457,246	11,470,870	11,501,815	11,509,564	11,538,701	11,559,420	11,846,279	11,893,292	11,946,912	12,235,503	12,858,961	12,883,462	12,884,977	12,890,875	12,891,683	12,865,058	13,035,204	13,062,777	13,071,736	
5	9,360,117	9,139,034	9,819,808	11,745,547	12,748,896	16,510,861	15,778,098	13,109,251	13,610,730	13,061,228	12,689,582	11,352,565	10,976,854	10,792,912	10,552,221	12,122,523	13,605,650	14,846,833	14,806,930	10,869,553	13,035,980	12,640,191	11,956,524	
6	32,968,055	32,117,958	32,492,959	34,363,978	35,544,494	40,040,135	37,887,349	38,742,942	37,408,307	36,857,482	38,187,388	36,193,312	33,680,064	45,258,800	34,417,077	37,393,687	38,493,581	40,523,332	40,000,211	36,618,863	38,664,488	37,075,013	36,529,448	

Line No.	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Budget Aug-21	Budget Sep-21
1															
2	11,034,834	13,302,470	15,673,149	9,628,224	10,009,000	11,351,808	11,771,136	13,142,184	15,017,176	12,320,325	12,915,228	11,686,340	13,721,519	11,871,501	11,662,079
3	361,397	5,541,686	294,278	650,574	869,549	1,314,670	1,359,526	1,499,534	2,224,102	3,644,092	2,568,223	513,268	1,363,250	385,705	389,205
4	13,139,366	13,231,495	13,791,871	13,720,192	13,933,593	15,025,583	15,035,170	15,032,276	14,987,776	14,967,527	14,994,242	15,026,031	15,053,312	15,484,740	15,596,786
5	10,344,455	9,835,581	10,468,713	11,232,339	11,873,621	15,698,462	16,442,034	16,733,061	14,704,202	16,581,686	14,578,738	15,071,161	11,813,092	10,854,465	10,866,743
6	34,880,051	41,911,231	40,228,011	35,231,330	36,685,763	43,390,523	44,607,865	46,407,055	46,933,256	47,513,630	45,056,431	42,296,800	41,951,173	38,596,410	38,514,813

**Atmos Energy - Atmos Pipeline - Texas**  
**Total Direct Operating Expenses**  
**January 2017 - July 2021 and August-September Budget 2021**

Line No.	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18
1	<b>Operating Expenses</b>																		
2	6,759,561	7,384,385	8,601,199	8,995,771	8,708,287	6,747,052	7,777,449	12,635,078	18,028,946	7,372,225	7,878,830	7,004,808	8,298,587	7,529,266	8,320,653	8,412,679	9,696,110	10,318,208	14,072,899
3	-	-	(30,569)	-	-	13,280	-	-	31,300	-	-	13,385	-	-	(16,888)	-	-	78,547	-
4	5,355,269	5,363,077	5,396,673	5,915,458	5,527,789	5,569,122	5,571,273	7,208,138	7,917,574	7,424,037	7,497,925	7,762,290	7,776,449	7,830,654	7,871,842	7,916,650	7,950,027	8,044,439	8,092,194
5	2,390,174	2,889,608	2,552,320	(7,782,962)	12,974,960	754,775	2,565,197	2,583,594	2,605,432	2,419,497	2,745,026	2,357,392	2,857,323	2,772,448	2,755,966	2,710,289	2,774,842	2,561,371	2,639,819
6	<u>14,505,004</u>	<u>15,637,070</u>	<u>16,519,624</u>	<u>7,128,267</u>	<u>27,211,036</u>	<u>13,084,229</u>	<u>15,913,919</u>	<u>22,426,810</u>	<u>28,583,253</u>	<u>17,215,760</u>	<u>18,121,780</u>	<u>17,137,876</u>	<u>18,932,359</u>	<u>18,132,368</u>	<u>18,931,572</u>	<u>19,039,618</u>	<u>20,420,979</u>	<u>21,002,565</u>	<u>24,804,912</u>

Line No.	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	
1																								
2	14,389,712	12,749,921	9,812,837	9,094,966	10,041,630	8,123,152	8,073,749	11,084,331	12,009,229	12,397,852	11,750,899	13,315,995	12,067,190	15,152,419	9,775,131	7,805,416	16,154,202	9,243,892	9,449,334	8,593,585	11,824,730	11,794,298	14,211,265	
3	-	59,951	-	-	(46,441)	-	-	(61,780)	-	-	30,899	-	-	(28,514)	-	-	(56,084)	-	-	-	(3,488)	-	-	(6,248)
4	8,363,616	8,614,097	8,610,420	8,685,847	8,812,049	8,855,239	8,872,215	8,893,461	8,918,211	8,944,407	8,978,915	8,990,993	9,018,736	9,186,220	9,456,754	9,517,982	9,763,651	9,770,020	9,795,520	9,834,971	9,860,527	9,881,973	9,923,636	
5	2,735,173	2,613,049	2,627,450	3,062,844	2,467,202	2,545,320	2,774,497	2,579,432	2,554,360	2,583,353	2,553,495	2,648,893	3,200,153	2,853,068	2,736,089	3,070,120	2,467,914	3,349,845	3,080,726	(247,199)	3,047,909	3,144,924	3,020,758	
6	25,488,502	24,037,018	21,050,707	20,843,657	21,274,440	19,523,711	19,720,461	22,495,444	23,481,800	23,925,612	23,314,208	24,955,881	24,286,080	27,163,193	21,967,974	20,393,519	28,329,682	22,363,757	22,325,580	18,177,869	24,733,165	24,821,195	27,149,413	

Line No.	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Budget Aug-21	Budget Sep-21
1															
2	12,056,579	15,819,732	13,084,512	8,163,593	7,753,493	9,549,607	8,001,551	7,586,483	11,829,449	13,178,971	17,323,346	18,497,675	16,591,222	16,589,194	14,866,817
3	-	-	8,754	-	-	944	-	-	50,561	-	-	36,945	-	5,000	5,000
4	10,092,348	10,500,894	10,845,986	10,671,992	10,630,222	10,862,498	10,886,369	10,900,570	10,932,098	10,979,459	10,997,247	11,021,176	11,099,857	11,064,157	11,144,591
5	3,148,667	3,150,607	3,237,781	2,901,624	3,055,483	3,039,869	3,303,645	3,271,747	3,146,543	3,202,481	3,088,647	3,051,232	3,167,121	3,367,091	3,367,091
6	25,297,594	29,471,233	27,177,033	21,737,210	21,439,197	23,452,918	22,191,565	21,758,800	25,958,651	27,360,911	31,409,240	32,607,028	30,858,200	31,025,442	29,383,499



**Atmos Energy - Atmos Energy Louisiana Industrial Gas  
Total Direct Operating Expenses  
January 2017 - July 2021 and August-September Budget 2021**

Line No.		Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	
1	<b>Operating Expenses</b>																										
2	Direct Expenses	180,077	115,586	99,603	102,963	133,727	134,930	132,072	151,087	86,965	75,477	79,319	76,820	96,186	74,628	78,765	81,300	95,782	90,341	85,614	86,208	67,884	77,312	80,183	69,829	90,712	
3	Bad Debt Expense	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Depreciation and Amortization	17,105	14,700	15,905	15,907	15,908	16,306	16,368	15,866	17,132	18,735	18,727	18,737	18,749	18,775	18,775	18,780	18,773	18,718	18,741	18,753	16,748	16,646	16,638	16,718	16,726	
5	Total Taxes - Other Than Income Taxes	44,897	25,974	17,083	20,185	28,537	19,241	37,756	11,873	17,212	19,981	68,649	9,991	30,118	(330,478)	32,079	27,226	40,075	22,282	23,652	24,626	20,784	21,361	45,861	14,580	25,061	
6		<u>242,079</u>	<u>156,260</u>	<u>132,591</u>	<u>139,055</u>	<u>178,172</u>	<u>170,478</u>	<u>186,196</u>	<u>178,826</u>	<u>121,309</u>	<u>114,192</u>	<u>166,695</u>	<u>105,549</u>	<u>145,053</u>	<u>(237,075)</u>	<u>129,619</u>	<u>127,307</u>	<u>154,630</u>	<u>131,341</u>	<u>128,006</u>	<u>129,587</u>	<u>105,415</u>	<u>115,319</u>	<u>142,682</u>	<u>101,127</u>	<u>132,499</u>	

Line No.	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	
1																															
2	83,620	74,446	91,443	88,575	106,650	87,581	80,731	76,804	80,033	90,778	81,769	91,383	75,165	96,913	92,622	82,846	97,154	83,454	85,477	83,500	89,603	88,307	86,848	87,564	78,348	90,115	88,156	78,501	85,648	86,952	
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	(228,115)	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	16,732	16,675	16,635	16,468	16,475	15,871	15,771	15,961	16,140	16,114	16,101	16,173	16,173	16,215	16,224	16,225	16,466	16,503	16,816	16,355	18,023	18,071	18,106	18,106	18,108	18,090	18,095	18,118	18,787	18,609	
5	20,874	24,200	21,829	27,100	20,460	16,046	15,437	14,773	10,354	26,162	3,258	15,845	12,210	13,110	12,820	15,253	10,925	12,041	10,800	11,514	8,599	23,846	2,093	17,883	15,414	16,749	18,740	15,170	16,452	16,156	
6	121,226	115,321	129,907	132,143	143,585	119,498	111,940	107,537	106,528	133,055	101,128	123,400	103,548	126,239	121,667	114,325	(103,570)	111,999	113,092	111,369	116,225	130,224	107,046	123,554	111,871	124,954	124,991	111,789	120,886	121,717	

<u>Line No.</u>	<u>Budget Aug-21</u>	<u>Budget Sep-21</u>
1		
2	80,672	81,013
3	-	-
4	19,647	19,721
5	17,619	17,624
6	<u>117,938</u>	<u>118,358</u>

**Atmos Energy - UCG Storage**  
**Total Direct Operating Expenses**  
**January 2017 - July 2021 and August-September Budget 2021**

Line No.		Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	
1	<b>Operating Expenses</b>																											
2	Direct Expenses	15,298	31,480	33,295	23,737	17,734	27,012	14,528	24,416	118,730	20,277	19,089	15,174	28,107	27,309	21,480	24,865	43,937	22,506	12,021	30,229	47,894	17,120	15,558	16,534	25,976	30,700	-
3	Bad Debt Expense	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Depreciation and Amortization	18,093	18,093	18,085	18,085	18,062	18,085	18,060	18,056	18,079	18,246	18,252	18,251	18,252	18,252	18,252	18,252	18,252	18,252	18,272	18,281	18,147	17,318	19,169	19,141	19,250	19,242	19,180
5	Total Taxes - Other Than Income Taxes	3,354	3,243	3,201	3,201	3,258	3,201	3,213	3,267	3,183	2,500	2,864	2,460	2,667	14,382	2,597	2,606	18,605	2,590	2,624	2,581	2,616	2,809	3,075	2,657	2,839	2,765	
6		<u>36,745</u>	<u>52,816</u>	<u>54,582</u>	<u>45,023</u>	<u>39,054</u>	<u>48,298</u>	<u>35,800</u>	<u>45,738</u>	<u>139,992</u>	<u>41,023</u>	<u>40,205</u>	<u>35,885</u>	<u>49,025</u>	<u>59,944</u>	<u>42,329</u>	<u>45,723</u>	<u>80,793</u>	<u>43,368</u>	<u>32,925</u>	<u>50,957</u>	<u>67,828</u>	<u>39,098</u>	<u>37,774</u>	<u>38,441</u>	<u>48,057</u>	<u>52,645</u>	

Line No.	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Budget Aug-21	Budget Sep-21	
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	26,293	32,076	28,627	14,180	12,008	13,766	57,589	39,773	24,270	13,882	15,089	20,769	22,134	43,968	46,250	21,870	(52,631)	12,651	15,511	6,706	12,957	15,300	18,868	20,199	16,246	11,404	29,397	35,450	18,889	22,030	12,397	
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	19,164	19,170	19,179	19,175	19,852	19,366	19,497	19,274	19,253	19,261	19,321	19,322	19,359	19,345	19,345	19,348	19,365	27,407	21,874	22,066	22,035	22,093	22,064	22,058	22,058	22,061	22,064	22,061	22,041	20,042	20,075	
5	2,748	6,718	16,667	2,751	2,841	2,780	2,760	1,263	1,404	1,017	2,381	2,257	20,232	2,261	1,542	4,104	1,909	2,245	2,755	143	(142)	228	2,477	2,253	6,333	2,274	2,261	2,270	14,650	1,787	1,787	
6	48,205	57,964	64,473	36,106	34,700	35,913	79,846	60,310	44,928	34,160	36,792	42,348	61,725	65,575	67,137	45,322	(31,357)	42,302	40,140	28,915	34,850	37,620	43,409	44,510	44,637	35,739	53,721	59,781	55,580	43,859	34,259	

**Atmos Energy - TLGS**  
**Total Direct Operating Expenses**  
**January 2017 - July 2021 and August-September Budget 2021**

Line No.	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	
1	<b>Operating Expenses</b>																										
2	32,875	510	69,002	716	53,948	31,739	726	705	740	1,462	705	705	206,097	747	152,114	30,858	51,964	30,468	34,548	30,519	27,685	33,635	29,269	27,022	62,443	47,797	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	18,210	18,210	18,210	18,210	18,210	18,210	18,210	18,210	18,210	19,102	18,534	18,539	18,539	18,539	18,539	18,530	18,525	18,521	18,530	18,524	17,943	18,210	18,210	18,210	18,210	18,210	18,210
5	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,850	2,214	1,810	1,917	1,844	1,847	1,856	1,901	1,840	1,874	1,831	1,866	1,667	1,667	1,667	1,667	1,667	1,667
6	52,752	20,387	88,879	20,593	73,825	51,616	20,603	20,582	20,617	22,414	21,453	21,054	226,553	21,130	172,500	51,244	72,390	50,829	54,951	50,874	47,495	53,512	49,146	46,899	82,320	67,674	-

Line No.	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Budget Aug-21	Budget Sep-21		
1																																	
2	31,925	34,117	30,049	25,278	87,324	33,692	33,483	33,469	34,872	408	42,374	33,064	79,832	32,363	31,407	13,570	33,685	45,564	34,419	33,871	33,231	31,068	51,568	29,368	38,376	34,825	27,688	30,486	30,397	35,000	35,000		
3																																	
4	18,210	18,210	18,210	18,210	18,210	18,210	19,767	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	18,383	-	-
5	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	-	-
6	51,802	53,994	49,926	45,155	107,200	53,568	54,917	53,518	54,921	20,457	62,423	53,114	99,881	52,412	51,456	33,619	53,735	65,614	54,469	53,921	53,282	51,118	71,618	49,418	58,426	54,875	47,738	50,536	50,447	35,000	35,000		

**Atmos Energy - TLGP**  
**Total Direct Operating Expenses**  
**January 2017 - July 2021 and August-September Budget 2021**

Line No.		Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	
1	<b>Operating Expenses</b>																										
2	Direct Expenses	145,635	112,507	104,209	98,268	148,842	137,631	276,671	125,820	272,404	82,890	58,454	66,162	85,860	56,623	106,406	69,381	154,987	69,266	100,772	78,072	55,315	60,351	61,716	93,774	61,858	
3	Bad Debt Expense	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Depreciation and Amortization	65,171	65,298	65,224	65,291	65,296	65,298	65,438	65,427	64,515	66,285	66,293	66,310	66,311	66,311	66,311	66,312	66,309	66,378	66,409	62,449	61,223	64,281	64,289	64,295	64,296	
5	Total Taxes - Other Than Income Taxes	45,391	46,574	47,536	53,962	46,572	46,278	46,353	46,494	46,742	45,814	47,382	45,668	49,972	(74,301)	48,079	48,408	50,860	48,775	49,026	48,204	48,853	45,221	46,152	44,507	44,833	
6		<u>256,197</u>	<u>224,379</u>	<u>216,969</u>	<u>217,522</u>	<u>260,710</u>	<u>249,207</u>	<u>388,461</u>	<u>237,742</u>	<u>383,661</u>	<u>194,989</u>	<u>172,129</u>	<u>178,141</u>	<u>202,142</u>	<u>48,633</u>	<u>220,797</u>	<u>184,100</u>	<u>272,156</u>	<u>184,419</u>	<u>216,207</u>	<u>188,725</u>	<u>165,391</u>	<u>169,853</u>	<u>172,157</u>	<u>202,576</u>	<u>170,987</u>	



Line No.	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21		
1																																
2	61,215	60,962	90,608	63,510	117,812	75,715	88,810	101,025	72,870	54,791	54,319	79,044	50,471	204,892	108,222	79,448	50,709	55,267	54,640	54,277	52,854	81,314	55,722	49,224	46,885	77,868	70,383	132,995	52,850	59,217		
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	64,304	64,165	64,183	64,186	64,199	64,205	64,205	65,921	64,943	64,944	64,978	64,978	64,983	64,986	65,088	65,089	65,481	65,568	65,693	64,528	64,951	64,971	65,064	65,065	65,067	65,083	65,228	65,239	65,247	65,247		
5	46,073	44,500	44,822	44,820	44,691	43,533	46,204	44,572	27,989	30,024	26,157	35,756	34,899	(67,192)	41,889	41,915	41,891	43,962	42,198	46,302	42,085	23,027	33,166	35,671	35,604	34,912	34,887	34,944	34,537	35,610		
6	171,592	169,627	199,613	172,516	226,702	183,453	199,220	211,518	165,802	149,758	145,454	179,778	150,352	202,686	215,199	186,452	158,080	164,796	162,531	165,107	159,890	169,312	153,952	149,961	147,556	177,862	170,497	233,178	152,433	160,074		

<u>Line No.</u>	<u>Budget Aug-21</u>	<u>Budget Sep-21</u>
1		
2	117,784	116,361
3	-	-
4	87,214	87,371
5	38,123	38,120
6	<u>243,121</u>	<u>241,852</u>

**Atmos Energy - Remaining Nonreg  
Total Direct Operating Expenses  
January 2017 - July 2021 and August-September Budget 2021**

Line No.	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	
1	<b>Operating Expenses</b>																										
2	37,422	13,872	98,632	9,572	65,001	35,843	14,939	15,966	26,562	15,266	20,214	18,774	210,754	5,632	163,122	38,279	55,986	40,109	38,924	43,735	(640,835)	50,178	21,293	38,144	44,405	155,668	
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	(1,520)	(0)	-	-	-	
4	19,048	18,875	18,865	18,865	18,867	18,866	18,869	18,864	18,849	19,102	18,534	18,539	18,539	18,539	18,539	18,530	18,525	18,521	18,530	18,524	17,943	37,703	29,671	29,675	30,031	39,571	
5	34,741	28,567	21,211	21,346	21,280	36,946	20,498	20,790	20,690	23,700	24,064	39,157	23,767	(87,418)	23,697	23,706	23,751	23,690	23,724	23,681	23,716	(123,253)	9,380	(8,054)	(14,062)	(125,416)	
6	91,211	61,313	138,709	49,783	105,147	91,555	54,307	55,621	66,101	58,069	62,812	76,470	253,059	(63,247)	205,358	80,515	98,261	82,319	81,177	65,940	(599,175)	(36,893)	60,345	59,765	60,374	69,822	

Line No.	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Budget Aug-21	Budget Sep-21		
1																																	
2	29,124	39,991	39,580	17,268	251,594	62,716	81,887	40,191	(3,877)	9,299	23,751	16,789	29,786	12,772	13,100	7,968	20,929	24,121	43,506	32,670	13,729	8,267	23,177	11,950	28,083	12,544	25,433	127,198	80,274	47,016	32,856		
3	-	-	-	(0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	(0)	-	
4	31,737	31,747	31,745	31,753	31,755	31,755	31,858	31,785	31,785	31,798	31,798	31,846	31,824	31,863	31,863	31,868	31,897	31,944	31,696	31,559	31,550	31,574	31,574	31,574	31,574	31,577	31,579	31,581	31,582	75,943	86,151		
5	1,091	(5,790)	13,815	12,953	(221,248)	(28,660)	(51,653)	8,769	53,084	39,231	25,740	32,486	46,752	36,509	36,213	44,707	28,510	25,132	6,640	16,373	26,247	36,502	22,009	33,011	20,959	32,439	19,536	(78,668)	(10,578)	(14,510)	(357)		
6	61,951	65,947	85,141	61,374	62,101	65,611	62,092	80,745	80,992	80,328	81,289	81,121	108,362	81,145	81,176	84,543	81,336	81,197	81,841	80,802	71,526	76,343	76,760	76,536	80,617	76,560	76,549	80,112	101,278	108,449	118,650		

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-36**  
**Page 1 of 1**

**REQUEST:**

Refer to Exhibit JTC-2, which shows base year and test year allocated O&M amounts by division and cost element and the difference in the test year compared to the base year. Confirm that the Company removed all incentive compensation expense tied to financial performance from the test year revenue requirement, including any type of short-term cash incentive awards and any type of stock awards, such as restricted stock units. If not, identify and quantify the amount of any other incentive compensation remaining in the test year.

**RESPONSE:**

Confirmed, the Company has removed all compensation that has Earnings Per Share as a component of the calculation.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-37**  
**Page 1 of 1**

**REQUEST:**

Refer to Exhibit JTC-2, which shows base year and test year allocated O&M amounts by division and cost element. Provide a similar schedule which reflects the actual O&M costs by cost element for the fiscal years ended September 30, 2018, September 30, 2019, September 30, 2020, and for all actual months during the fiscal year ended September 30, 2021 with available information.

**RESPONSE:**

Please see Attachment 1.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-37\_Att1 - O&M Expense by Division.xlsx, 3 Pages.

Respondent: Michelle Faulk

# Atmos Energy Corporation

## Operation & Maintenance Expenses

### Atmos Energy-KY/Mid-States

	Directly Charged to Kentucky			
	Fiscal 2018 YTD September	Fiscal 2019 YTD September	Fiscal 2020 YTD September	Fiscal 2021 YTD July
Labor	\$ 5,641,605	\$ 5,516,488	\$ 5,156,195	\$ 4,221,068
Benefits	1,757,155	1,591,960	1,393,600	1,285,912
Employee Welfare	121,339	100,887	112,564	112,769
Insurance	184,269	211,480	178,036	156,214
Rent, Maint., & Utilities	686,894	614,067	1,129,721	922,257
Vehicles & Equip	1,053,581	1,087,354	822,924	636,948
Materials & Supplies	885,200	849,371	763,393	647,177
Information Technologies	13,964	60,926	16,422	7,049
Telecom	376,761	410,788	220,220	171,145
Marketing	203,342	185,407	187,853	269,762
Directors & Shareholders & PR	156	134	1,679	249
Dues & Membership Fees	149,453	141,008	172,288	144,161
Print & Postages	15,943	14,348	53,162	37,377
Travel & Entertainment	622,169	735,409	305,324	47,425
Training	27,190	120,325	11,410	10,370
Outside Services	4,596,872	5,940,892	4,286,915	4,244,404
Provision for Bad Debt	911,822	1,011,886	1,183,719	1,445,873
Miscellaneous	117,502	148,789	148,606	76,694
<b>Total O&amp;M Expenses</b>	<b>\$ 17,365,214</b>	<b>\$ 18,741,520</b>	<b>\$ 16,144,027</b>	<b>\$ 14,436,854</b>

# Atmos Energy Corporation

## Operation & Maintenance Expenses

### Atmos Regulated Shared Services

#### Allocated to Kentucky from Shared Services

	Fiscal 2018	Fiscal 2019	Fiscal 2020	Fiscal 2021
	YTD September	YTD September	YTD September	YTD July
Labor	\$ 3,728,584	\$ 4,043,478	\$ 4,162,614	\$ 3,330,358
Benefits	1,205,731	1,130,127	1,285,682	1,064,793
Employee Welfare	1,838,394	1,881,815	2,138,222	2,080,436
Insurance	1,105,144	1,088,258	1,415,183	1,198,694
Rent, Maint., & Utilities	401,349	419,333	418,519	311,259
Vehicles & Equip	2,996	5,760	4,900	2,159
Materials & Supplies	52,175	71,959	49,621	35,757
Information Technologies	1,131,691	1,308,937	1,554,467	1,284,755
Telecom	129,179	132,288	143,280	116,620
Marketing	13,244	16,192	11,995	8,770
Directors & Shareholders & PR	327,492	327,252	311,131	300,881
Dues & Membership Fees	26,355	16,856	38,596	30,648
Print & Postages	9,084	9,736	16,257	22,050
Travel & Entertainment	148,738	191,569	79,365	13,097
Training	65,650	78,070	47,044	30,144
Outside Services	916,237	1,114,644	1,050,016	738,674
Provision for Bad Debt	-	-	-	-
Miscellaneous	(2,018,811)	(3,702,526)	(4,584,115)	(3,809,748)
<b>Total O&amp;M Expenses</b>	<b>\$ 9,083,233</b>	<b>\$ 8,133,749</b>	<b>\$ 8,142,778</b>	<b>\$ 6,759,344</b>



# Atmos Energy Corporation

## Operation & Maintenance Expenses

### Atmos Energy-KY/Mid-States

#### Allocated to Kentucky from Division General Office

	Fiscal 2018	Fiscal 2019	Fiscal 2020	Fiscal 2021
	YTD September	YTD September	YTD September	YTD July
Labor	\$ 1,327,342	\$ 1,312,150	\$ 1,758,273	\$ 1,401,299
Benefits	304,205	41,556	437,698	356,623
Employee Welfare	734,180	721,967	775,714	745,245
Insurance	31,347	19,246	10,027	8,181
Rent, Maint., & Utilities	163,146	187,440	196,723	142,570
Vehicles & Equip	24,045	35,495	37,366	38,230
Materials & Supplies	86,780	63,438	54,253	19,571
Information Technologies	36,304	70,023	71,031	69,543
Telecom	141,132	156,038	150,901	104,394
Marketing	157,042	170,427	181,262	112,448
Directors & Shareholders & PR	-	-	182	-
Dues & Membership Fees	6,947	8,006	5,771	4,873
Print & Postages	6,705	6,058	7,277	5,411
Travel & Entertainment	252,282	337,886	160,075	35,291
Training	29,015	34,942	28,438	11,978
Outside Services	687,159	1,011,128	1,186,558	905,697
Provision for Bad Debt	-	-	-	-
Miscellaneous	(107,966)	(89,826)	(126,096)	(98,323)
<b>Total O&amp;M Expenses</b>	<b>\$ 3,879,667</b>	<b>\$ 4,085,972</b>	<b>\$ 4,935,453</b>	<b>\$ 3,863,031</b>

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-38**  
**Page 1 of 1**

**REQUEST:**

Refer to Exhibit JTC-2, which shows base year and test year allocated O&M amounts by division and cost element. Provide the actual capitalization percentage rate for labor and related costs for each month for each of the depicted divisions from October 2017 through the most recent month available in live spreadsheet format.

**RESPONSE:**

Please see Attachment 1 for capitalization rates by month for the cost categories shown in JTC-2.

For Shared Services, overhead capitalization rates are determined by cost center. Attachment 1 shows the overall capitalized overhead rate by month, including labor and non-labor, for Shared Services. In JTC-2, the Miscellaneous category for Shared Services shows a net credit. This is because all of the Shared Services overhead capitalization credit gets charged within this line item.

For Kentucky (Div 009) and the Division General Office (Div 091), the categories of expense that have a capital portion have been included in Attachment 1. Please note that the line items in JTC-2 for Div 009 and Div 091 are O&M expense, net of any amounts capitalized.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-38\_Att1 - Cap Rate Percentages by Month.xlsx, 1 Page

Respondent: Michelle Faulk

Atmos Energy Corporation  
Capital %'s by Month  
For October 2017 through July 2021

Shared Services			
Month	SSU Gross O&M Cost (Labor and Nonlabor)	A&G Overhead Clearing Subaccount 04863	Cap OH %
Oct-17	15,733,585	(6,913,072)	43.9%
Nov-17	15,058,705	(4,722,754)	31.4%
Dec-17	15,003,507	(1,596,314)	10.4%
Jan-18	16,662,959	(3,784,845)	22.7%
Feb-18	15,865,695	(4,295,330)	27.1%
Mar-18	44,180,497	(6,157,951)	13.9%
Apr-18	18,662,057	(4,251,493)	22.8%
May-18	22,330,157	(4,856,405)	21.7%
Jun-18	16,944,055	(8,956,749)	52.9%
Jul-18	22,903,058	(5,075,123)	22.2%
Aug-18	17,071,191	(6,479,888)	38.0%
Sep-18	17,884,422	(5,887,981)	32.9%
Oct-18	19,411,205	(4,741,604)	24.4%
Nov-18	16,136,282	(6,683,461)	41.4%
Dec-18	13,823,964	(2,546,288)	18.4%
Jan-19	18,274,100	(4,735,658)	25.9%
Feb-19	17,355,695	(5,515,619)	31.8%
Mar-19	19,742,116	(5,288,618)	26.8%
Apr-19	18,453,023	(5,124,426)	27.8%
May-19	23,665,475	(5,022,580)	21.2%
Jun-19	21,341,482	(10,796,634)	50.6%
Jul-19	19,913,595	(5,897,006)	29.6%
Aug-19	20,344,861	(8,652,625)	42.5%
Sep-19	16,889,739	(5,418,487)	32.1%
Oct-19	20,324,110	(4,968,837)	24.4%
Nov-19	18,127,680	(6,945,702)	38.3%
Dec-19	18,290,987	(5,454,571)	29.8%
Jan-20	17,833,664	(6,896,994)	38.7%
Feb-20	18,533,388	(6,718,085)	36.2%
Mar-20	20,838,557	(6,396,534)	30.7%
Apr-20	17,674,747	(7,028,798)	39.8%
May-20	23,138,720	(6,274,625)	27.1%
Jun-20	14,371,027	(5,802,211)	40.4%
Jul-20	31,155,060	(14,521,412)	46.6%
Aug-20	22,673,570	(7,991,984)	35.2%
Sep-20	18,872,731	(8,028,774)	42.5%
Oct-20	18,616,002	(5,106,121)	27.4%
Nov-20	17,136,155	(7,367,497)	43.0%
Dec-20	19,253,436	(6,237,279)	32.4%
Jan-21	19,609,419	(7,100,789)	36.2%
Feb-21	18,557,948	(7,004,257)	37.7%
Mar-21	20,525,864	(6,622,012)	32.3%
Apr-21	20,402,062	(7,567,160)	37.1%
May-21	23,697,587	(7,109,798)	30.0%
Jun-21	27,941,068	(15,428,640)	55.2%
Jul-21	26,865,006	(7,058,267)	26.3%

Kentucky (Div 009)									
Month	Labor & Benefits	Uniforms	Insurance (primarily property)	Vehicles	Heavy Equipment	Building Rents	Utilities	Telecom	
Oct-17	51.9%	58.8%	57.1%	55.2%	98.0%	54.1%	45.3%	35.6%	
Nov-17	49.7%	54.0%	53.5%	51.4%	98.0%	53.1%	38.7%	23.7%	
Dec-17	53.5%	49.4%	54.7%	53.3%	98.0%	55.3%	38.4%	40.7%	
Jan-18	46.7%	51.3%	52.5%	50.5%	98.0%	52.6%	45.6%	39.1%	
Feb-18	56.9%	48.4%	55.2%	53.6%	98.0%	51.8%	38.2%	32.1%	
Mar-18	64.3%	52.2%	58.4%	56.9%	98.0%	62.7%	46.2%	37.3%	
Apr-18	55.1%	58.6%	58.0%	57.0%	98.0%	57.9%	47.3%	42.4%	
May-18	50.9%	57.2%	56.8%	53.3%	98.0%	55.7%	46.4%	39.0%	
Jun-18	54.9%	61.3%	57.8%	51.7%	98.0%	56.2%	44.2%	37.4%	
Jul-18	53.2%	61.4%	57.6%	54.4%	98.0%	59.3%	26.1%	42.3%	
Aug-18	63.8%	53.3%	57.1%	57.5%	98.0%	59.4%	26.1%	41.6%	
Sep-18	56.6%	58.5%	58.6%	56.4%	98.0%	58.5%	49.1%	38.8%	
Oct-18	49.6%	57.2%	56.3%	55.5%	98.0%	57.4%	48.4%	39.4%	
Nov-18	52.5%	52.9%	54.4%	54.2%	98.0%	58.1%	45.7%	36.6%	
Dec-18	55.2%	54.7%	56.2%	57.1%	98.0%	59.5%	47.4%	34.4%	
Jan-19	59.7%	61.7%	59.6%	61.6%	98.0%	63.2%	53.4%	43.4%	
Feb-19	58.1%	61.9%	60.1%	59.4%	98.0%	60.7%	43.0%	38.1%	
Mar-19	67.2%	56.7%	59.2%	59.4%	98.0%	61.9%	44.7%	42.6%	
Apr-19	56.8%	64.3%	58.6%	59.4%	98.0%	62.6%	49.8%	36.1%	
May-19	53.7%	59.7%	58.4%	54.7%	98.0%	56.7%	40.3%	35.8%	
Jun-19	60.3%	64.1%	59.3%	59.6%	98.0%	64.0%	50.8%	40.1%	
Jul-19	56.4%	65.0%	59.9%	61.2%	98.0%	63.2%	48.4%	38.7%	
Aug-19	64.5%	61.7%	59.5%	57.7%	98.0%	60.7%	47.1%	35.8%	
Sep-19	59.2%	62.2%	61.1%	62.6%	98.0%	61.6%	49.3%	36.3%	
Oct-19	55.1%	59.0%	59.2%	60.1%	98.0%	60.1%	43.5%	55.3%	
Nov-19	49.8%	53.7%	53.7%	51.8%	98.0%	52.8%	41.2%	44.9%	
Dec-19	58.6%	60.5%	57.7%	55.4%	98.0%	42.8%	50.4%	39.4%	
Jan-20	65.7%	54.3%	58.1%	59.1%	98.0%	60.6%	41.8%	49.6%	
Feb-20	60.1%	56.7%	58.3%	59.9%	98.0%	62.0%	43.4%	41.7%	
Mar-20	58.6%	70.2%	58.5%	60.8%	98.0%	64.8%	50.7%	50.8%	
Apr-20	58.5%	66.1%	58.4%	56.1%	98.0%	63.3%	45.2%	47.8%	
May-20	60.4%	62.0%	57.8%	58.1%	98.0%	60.7%	45.5%	49.5%	
Jun-20	57.2%	61.4%	57.2%	60.6%	98.0%	61.0%	49.0%	49.3%	
Jul-20	66.7%	63.1%	58.6%	57.9%	98.0%	63.1%	48.9%	49.4%	
Aug-20	60.5%	55.2%	59.1%	59.3%	98.0%	63.8%	47.6%	49.4%	
Sep-20	58.9%	60.4%	58.8%	46.0%	98.0%	65.1%	44.9%	48.8%	
Oct-20	58.7%	58.7%	58.4%	70.7%	98.0%	63.2%	46.4%	49.1%	
Nov-20	60.9%	60.5%	60.0%	54.0%	98.0%	64.6%	45.3%	49.5%	
Dec-20	65.5%	55.1%	58.4%	60.6%	98.0%	61.2%	44.7%	47.7%	
Jan-21	58.7%	60.9%	58.5%	59.9%	98.0%	57.4%	48.6%	53.6%	
Feb-21	57.5%	55.8%	56.5%	50.1%	98.0%	53.8%	40.3%	47.7%	
Mar-21	57.3%	55.1%	59.0%	50.4%	98.0%	57.6%	49.6%	49.2%	
Apr-21	58.1%	56.9%	59.2%	57.3%	98.0%	60.5%	48.7%	48.6%	
May-21	56.4%	58.9%	58.7%	52.4%	98.0%	60.7%	48.2%	49.7%	
Jun-21	56.2%	56.1%	59.3%	62.3%	98.0%	61.9%	47.7%	51.3%	
Jul-21	67.8%	57.9%	60.4%	58.2%	98.0%	66.6%	48.3%	49.6%	

Division General Office (Div 091)									
Month	Labor & Benefits	VPP/MIP	Restricted Stock	SERP	Vehicles	Building Rents	Utilities	Telecom	
Oct-17	51.3%	57.7%	51.9%	51.3%	66.6%	65.4%	41.6%	36.6%	
Nov-17	52.0%	56.0%	53.6%	51.3%	67.6%	65.7%	67.7%	29.8%	
Dec-17	52.4%	57.7%	47.5%	51.3%	68.7%	66.0%	59.7%	37.8%	
Jan-18	50.0%	57.6%	52.5%	51.3%	65.7%	62.6%	56.3%	18.5%	
Feb-18	52.6%	58.0%	52.6%	51.3%	65.7%	63.6%	60.7%	31.2%	
Mar-18	62.8%	58.0%	53.2%	52.5%	65.4%	63.9%	46.8%	34.9%	
Apr-18	53.9%	57.8%	52.5%	52.5%	63.4%	61.4%	64.5%	42.6%	
May-18	51.6%	57.9%	55.0%	52.5%	65.1%	63.4%	73.5%	39.0%	
Jun-18	54.2%	57.8%	40.0%	52.3%	55.3%	63.9%	74.6%	32.2%	
Jul-18	52.0%	57.9%	52.3%	52.3%	65.2%	63.8%	63.7%	20.4%	
Aug-18	62.8%	58.0%	51.2%	52.3%	63.5%	63.6%	54.3%	37.3%	
Sep-18	54.8%	N/A	34.1%	52.3%	98.5%	63.7%	66.0%	40.5%	
Oct-18	50.3%	57.9%	56.6%	54.9%	66.3%	63.4%	49.3%	32.3%	
Nov-18	51.1%	58.1%	63.5%	54.9%	64.0%	61.1%	71.1%	38.7%	
Dec-18	51.7%	57.6%	57.3%	54.9%	66.2%	64.0%	55.8%	29.7%	
Jan-19	49.2%	57.8%	57.2%	65.0%	60.1%	63.3%	55.6%	38.2%	
Feb-19	53.4%	57.8%	57.5%	61.7%	64.7%	63.8%	50.6%	36.2%	
Mar-19	64.1%	57.9%	57.5%	38.6%	67.3%	63.5%	52.6%	35.1%	
Apr-19	52.5%	57.5%	49.8%	38.6%	61.9%	61.9%	74.0%	35.7%	
May-19	51.8%	57.7%	52.6%	38.6%	85.4%	64.6%	60.7%	41.8%	
Jun-19	54.1%	57.7%	54.6%	38.6%	64.6%	67.6%	74.1%	35.9%	
Jul-19	48.9%	57.8%	56.6%	38.6%	74.8%	65.5%	77.6%	39.9%	
Aug-19	59.9%	57.8%	56.6%	38.6%	75.0%	61.6%	0.0%	37.6%	
Sep-19	51.3%	N/A	55.5%	38.6%	63.2%	61.2%	4.6%	48.2%	
Oct-19	48.9%	55.9%	53.5%	39.2%	64.2%	61.3%	69.1%	28.5%	
Nov-19	51.1%	56.0%	54.1%	39.2%	60.5%	60.9%	74.0%	32.9%	
Dec-19	50.4%	55.8%	54.5%	39.2%	62.0%	64.4%	68.1%	27.2%	
Jan-20	56.6%	56.0%	54.7%	39.2%	59.7%	63.0%	70.8%	39.5%	
Feb-20	45.9%	55.9%	54.5%	39.2%	58.1%	63.1%	57.0%	43.4%	
Mar-20	43.7%	55.9%	54.6%	39.2%	57.9%	61.3%	78.7%	40.8%	
Apr-20	46.4%	55.8%	54.5%	39.2%	61.2%	63.0%	79.0%	30.1%	
May-20	47.0%	55.7%	51.0%	39.2%	58.0%	60.7%	78.4%	36.3%	
Jun-20	47.2%	55.7%	52.8%	39.2%	58.7%	62.5%	70.3%	36.5%	
Jul-20	56.8%	55.8%	54.2%	39.2%	52.5%	63.7%	63.3%	34.6%	
Aug-20	45.0%	55.9%	34.1%	41.2%	56.9%	62.8%	79.7%	39.1%	
Sep-20	44.0%	N/A	54.1%	39.9%	55.5%	63.3%	69.5%	43.2%	
Oct-20	38.6%	56.4%	46.4%	37.2%	55.5%	63.1%	74.8%	40.0%	
Nov-20	47.7%	62.5%	51.8%	37.2%	58.4%	64.2%	69.6%	42.3%	
Dec-20	50.9%	57.3%	49.9%	37.2%	62.7%	64.1%	57.0%	34.2%	
Jan-21	36.1%	58.8%	49.9%	37.2%	61.4%	63.6%	38.0%	34.2%	
Feb-21	41.4%	57.2%	49.9%	37.2%	56.6%	63.6%	53.9%	38.3%	
Mar-21	40.9%	56.9%	51.1%	37.2%	56.6%	63.7%	29.3%	44.1%	
Apr-21	40.6%	56.3%	50.0%	37.2%	58.7%	63.6%	62.8%	39.9%	
May-21	43.9%	56.2%	50.0%	37.2%	61.2%	61.9%	52.7%	32.7%	
Jun-21	49.6%	56.6%	50.8%	37.2%	60.0%	63.8%	31.7%	41.6%	
Jul-21	58.3%	57.7%	51.6%	37.7%	61.0%	64.3%	61.1%	43.0%	

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-39**  
**Page 1 of 1**

**REQUEST:**

Refer to Schedules C-2.3 B and C-2.3 F at line 3 related to payroll tax expense for the Kentucky Division (Division 009).

- a. Actual payroll taxes depicted on line 3 of Schedule C-2.3 for the Kentucky Division averaged \$29,086 per month for the first six months of the base period, while the amount forecasted during the remainder of the base year averages \$44,455 per month. In addition, the average monthly amount forecasted for the test year is \$46,728. Explain the cause(s) of the large increase in monthly expense of approximately 53% projected for the remainder of the base year over base year actual amounts.
- b. Provide the actual payroll taxes for all months in 2018, 2019, 2020 and 2021 to date separated between expense, capitalized, and other. In addition, provide a similar breakout for all months in the base year and in the test year.

**RESPONSE:**

- a. The forecasted payroll tax amounts for the latter six months of the base year and for all months of test year are based on budgeted payroll taxes. Budgeted payroll taxes include payroll taxes related to incentive compensation that is excluded on line 10 of Schedule C-2. The payroll taxes relating to this excluded incentive compensation is similarly excluded from the test year revenues and expenses on line 14 of Schedule C-2. The Company estimates the payroll tax impact by calculating 6.5% of the excluded incentive compensation itemized on Schedule F-10.
- b. Please see Attachment 1 for 2018 through 2021 available actual payroll taxes. For the base year and test year payroll taxes, please see Schedules C-2.3 B and C-2.3 F. For the base year and test year, no further breakout of payroll taxed is readily available.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-39\_Att1 - KY Payroll Tax Jan18-Jul21 Actuals.xlsx, 1 Page.

Respondent: Joe Christian

**Atmos Energy Corporation - Kentucky Division (Div 009)**  
**Payroll Taxes Expensed and Capitalized**  
**For January 2018 July 2021**

	<b>Kentucky - Div 009</b>		
	<b>Expense</b>	<b>Capital</b>	<b>Gross</b>
Jan-18	43,715	47,525	91,240
Feb-18	22,051	23,973	46,024
Mar-18	44,849	48,759	93,608
Apr-18	19,472	21,169	40,641
May-18	23,062	25,072	48,134
Jun-18	24,167	26,274	50,441
Jul-18	22,211	24,147	46,358
Aug-18	47,834	52,004	99,838
Sep-18	21,438	23,307	44,745
Oct-18	21,738	26,420	48,158
Nov-18	63,320	76,958	140,278
Dec-18	10,863	13,203	24,066
Jan-19	22,265	27,061	49,326
Feb-19	29,110	35,380	64,490
Mar-19	49,720	60,428	110,148
Apr-19	18,359	22,313	40,672
May-19	22,936	27,875	50,811
Jun-19	26,215	31,861	58,076
Jul-19	16,756	20,365	37,121
Aug-19	52,148	63,380	115,528
Sep-19	22,934	27,874	50,808
Oct-19	20,670	26,809	47,479
Nov-19	154,796	200,764	355,560
Dec-19	(27,447)	(35,597)	(63,044)
Jan-20	58,330	75,652	133,982
Feb-20	19,545	25,349	44,894
Mar-20	20,332	26,370	46,702
Apr-20	21,133	27,409	48,542
May-20	22,971	29,793	52,764
Jun-20	18,908	24,523	43,431
Jul-20	42,102	54,605	96,707
Aug-20	14,900	19,325	34,225
Sep-20	16,458	21,345	37,803
Oct-20	17,537	19,081	36,618
Nov-20	56,025	60,960	116,985
Dec-20	27,380	29,792	57,172
Jan-21	30,289	32,957	63,246
Feb-21	27,390	29,803	57,193
Mar-21	15,891	17,291	33,182
Apr-21	22,423	24,398	46,821
May-21	22,622	24,615	47,237
Jun-21	20,101	21,872	41,973
Jul-21	47,829	52,041	99,870

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-40**  
**Page 1 of 1**

**REQUEST:**

Refer to Schedule C-2.3 F at line 5 related to ad valorem costs for the Kentucky Division. Provide all computations and workpaper documentation to compute the projected amounts depicted for all months in the test year for the Kentucky Division (009). Be sure to separate expensed vs capitalized amounts and amounts recovered via special riders.

**RESPONSE:**

Please see the files "Ad Valorem Budget FY 2021 - updated 5-7-2021.xlsx" and "Income Statement - Taxes Other-2021.xlsx" included in the Company's response to Staff DR No. 1-55.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-41**  
**Page 1 of 1**

**REQUEST:**

Provide the actual ad valorem taxes expensed and capitalized for the Kentucky Division during each of the last three fiscal years 2018, 2019, and 2020 by month. This request includes all PRP and non-PRP amounts.

**RESPONSE:**

Please see Attachment 1.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-41\_Att1 - Ad Valorem Tax Expense and Capitalized Tax FY18-FY20.xlsx, 1 Page.

Respondent: Joe Christian

## Ad Valorem Tax Expense and Capitalized Taxes (FY2018, FY2019, FY2020)

	Division 009		
	Ad Valorem	Capitalized	Total
	Tax Expense	Tax	Expense
<b>Oct-17</b>	391,500	(4,412)	387,088
<b>Nov-17</b>	391,500	(4,412)	387,088
<b>Dec-17</b>	391,500	(4,412)	387,088
<b>Jan-18</b>	423,000	(4,412)	418,588
<b>Feb-18</b>	423,000	(4,412)	418,588
<b>Mar-18</b>	423,000	(4,412)	418,588
<b>Apr-18</b>	423,000	(4,412)	418,588
<b>May-18</b>	423,000	(4,412)	418,588
<b>Jun-18</b>	423,000	(4,412)	418,588
<b>Jul-18</b>	423,000	(4,412)	418,588
<b>Aug-18</b>	423,000	(4,412)	418,588
<b>Sep-18</b>	423,000	(4,412)	418,588
<b>Total FY 2018</b>	4,981,500	(52,944)	4,928,556
<b>Oct-18</b>	485,000	(4,412)	480,588
<b>Nov-18</b>	485,000	(4,412)	480,588
<b>Dec-18</b>	485,000	(4,412)	480,588
<b>Jan-19</b>	618,000	(4,412)	613,588
<b>Feb-19</b>	618,000	-	618,000
<b>Mar-19</b>	618,000	-	618,000
<b>Apr-19</b>	618,000	-	618,000
<b>May-19</b>	618,000	(17,648)	600,352
<b>Jun-19</b>	618,000	(4,412)	613,588
<b>Jul-19</b>	618,000	(4,412)	613,588
<b>Aug-19</b>	618,000	(4,412)	613,588
<b>Sep-19</b>	618,000	(4,412)	613,588
<b>Total FY 2019</b>	7,017,000	(52,944)	6,964,056
<b>Oct-19</b>	569,000	(4,412)	564,588
<b>Nov-19</b>	569,000	(4,412)	564,588
<b>Dec-19</b>	569,000	(4,412)	564,588
<b>Jan-20</b>	620,000	(4,412)	615,588
<b>Feb-20</b>	620,000	(4,412)	615,588
<b>Mar-20</b>	1,118,800	(4,412)	1,114,388
<b>Apr-20</b>	631,394	(4,412)	626,982
<b>May-20</b>	631,394	(4,412)	626,982
<b>Jun-20</b>	631,394	(4,412)	626,982
<b>Jul-20</b>	631,394	(4,412)	626,982
<b>Aug-20</b>	631,394	(4,412)	626,982
<b>Sep-20</b>	631,394	(4,412)	626,982
<b>Total FY 2020</b>	7,854,164	(52,944)	7,801,220



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-42**  
**Page 1 of 1**

**REQUEST:**

Provide the gross plant and the net book value for the Kentucky Division at December 31, 2018, December 31, 2019, September 30, 2020, and December 31, 2020. This request includes all PRP and non-PRP amounts.

**RESPONSE:**

Please see Attachment 1. These plant balances are for total Kentucky and include both PRP and Non-PRP balances.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-42\_Att1 - KY Historical Plant Balances.xlsx, 1 Page.

Respondent: Joe Christian

**Atmos Energy Corporation - Kentucky Division (Div 009)**  
**Gross Plant, Accumulated Depreciation and Net Plant Balances**

	<b>DEC-18</b>	<b>DEC-19</b>	<b>SEP-20</b>	<b>DEC-20</b>
Gas Plant in Service - Lp - Production Plant 1010-10001	(44,369)	(44,369)	(44,369)	(44,369)
Gas Plant in Service - Ng - Production Plant 1010-10002	44,369	44,369	44,369	44,369
Gas Plant in Service - Ng - Storage Plant 1010-10003	15,022,906	16,166,147	16,168,207	16,168,207
Gas Plant in Service - Transmission Plant 1010-10004	31,425,491	32,780,262	33,163,430	33,163,430
Gas Plant in Service - General Dist System Plant 1010-10006	573,567,241	666,530,201	702,808,414	708,243,033
Gas Plant in Service - General Plant 1010-10008	22,923,221	24,056,898	24,247,420	24,947,034
<b>Gross Utility Plant In-Service (FERC 101)</b>	<b>642,938,858</b>	<b>739,533,507</b>	<b>776,387,470</b>	<b>782,521,702</b>
Accum Prov for Depreciation - Default 1080-00000	(181,534,918)	(175,427,361)	(175,811,981)	(176,837,842)
Accum Prov for Depreciation - WIP Salvage 1080-04881	(145,835)	(145,835)	(137,622)	(137,622)
Accum Prov for Depreciation - WIP Removal Cost 1080-04882	6,013,637	2,433,426	2,289,750	2,110,065
<b>Accumulated Depreciation (FERC 108)</b>	<b>(175,667,115)</b>	<b>(173,139,769)</b>	<b>(173,659,852)</b>	<b>(174,865,399)</b>
<b>Net Plant In-Service</b>	<b>467,271,743</b>	<b>566,393,738</b>	<b>602,727,618</b>	<b>607,656,304</b>

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-43**  
**Page 1 of 1**

**REQUEST:**

Refer to the Direct Testimony of Mr. Christian at pages 45-46 in regards to the Depreciation Regulatory Liability amount of \$9,804,757 that would accumulate through December 2021 based on the monthly additions of \$306,399 through that date. Refer also to the Amended Procedural Order issued by the Commission on July 30, 2021. Based on the procedural dates listed for this proceeding, provide an estimated date, or range of dates, in which the Company could expect to implement changes in rates that may be authorized by the Commission.

**RESPONSE:**

Based on the procedural date of July 23, 2021, the Company's application being deemed complete by the Commission, the Company calculates that the maximum time frame for implementing rates, subject to refund, is January 19, 2022 [KRS 278.190 (2)]. If Depreciation Regulatory Liability rates are implemented as proposed, for a twelve month period and done mid-month then a mid-month end period would need to occur. For example, if the rates began on cycle 7, then in January of 2023 the rates would need to run through cycle 6. In this example, the \$306,399 would be prorated 19/31 to account for a partial month liability accrual. Because the Depreciation Regulatory Liability rate is for a specific amount, the Company would propose that any true-up rate be implemented within 90 days of the initial rate ending unless it is a small amount (+/- \$100,000) which could be moved to the GCA for inclusion in the over/under deferred gas cost factor.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-44**  
**Page 1 of 1**

**REQUEST:**

Provide a description and all documentation of the Company's accounting for plant additions and retirements, including cost of removal, including, but not limited to, allocation of expenditures between plant additions and cost of removal when replacing sections of mains or accounting for such costs as maintenance expense. If the Company relies on studies to allocate such costs, then provide a copy of all such studies used for this purpose and provide an illustration as to how such allocations are actually used and applied in the accounting process. Address any differences between terminal and interim retirements and terminal and interim net salvage.

**RESPONSE:**

Charges to capital projects are incurred to Account 107 - Construction Work In Process. When assets are placed into service (Plant Additions), a credit is made to Account 107 and a debit to Account 101 - Gas Plant-In-Service. Accumulated depreciation is accounted for in Account 108 - Accumulated Provision for Depreciation. At the time of retirement, this account shall be charged with the book cost of the property retired and the cost of removal and shall be credited with the salvage value and any other amounts recovered.

From October 2015 forward for Accounts 376 and 380 and then for all Measurement (Metering) and Regulating accounts from November 2016 forward, the allocation on replacement projects between the new addition and cost of removal is based on the time and motion studies provided as Attachment 1 and Attachment 2.

**ATTACHMENTS:**

ATTACHMENT 1 - AG\_1-44\_Att1 - Mains and Services Time and Motion Study.pdf, 21 Pages.

ATTACHMENT 2 - AG\_1-44\_Att2 - Meters and M&R Time and Motion Study.pdf, 17 Pages.

Respondent: Michelle Faulk

# Atmos Energy 2014 Removal Cost Study



# Atmos Energy 2014 Removal Cost Study Table of Contents

Introduction..... 3  
Study Methodology ..... 4  
Study Results..... 6  
Detailed Discussion ..... 7  
    Detailed Process Description ..... 7  
    Mains..... 10  
    Services ..... 11  
Appendix A Sampling Form..... 12  
Appendix B Project Results ..... 14  
Appendix C 2011 WTX Sample Results..... 20

## Introduction

Atmos Energy contracted with Alliance Consulting Group in 2014 to conduct a study to determine the percentages of labor costs related to replacement projects for Mains and Services. The study results would be used to allocate to removal cost for various capital replacement-related activities. Prior to this study, costs of activities solely related to the removal of old assets in replacement projects were generally estimated on a project by project basis and charged to a Removal Task associated with each project. The estimation of the removal effort varied based on, among other things, the type of project and the assumptions made by the estimator. Activities such as purging, cutting, capping, bypassing the existing gas flow and removal of the risers were applied at 100% to removal costs. Other costs related to common activities such as excavation, surface repairs, and backfilling were, in many cases, allocated between construction and removal cost. In this study, Alliance Consulting Group and Atmos Energy considered the various approaches to calculating the removal cost percentages and agreed to the exclusion of common activities from removal cost. A primary thought in moving to this approach is to create more consistency between the capitalization of the first installation of an asset and the replacement capitalization of the asset by attributing all activities necessary to the installation to the capitalized installation cost.

## Study Methodology

In this study, the methodology of sharing common costs and a more conservative approach of only applying the cost of “incremental” activities that were specifically driven by the retirement of the old asset in replacement project were considered.

In the common cost sharing methodology, 50% (or some portion) of the costs of common activities are allocated to removal cost. These costs would be incurred whether solely constructing a new asset or solely retiring an asset. From this perspective, it is logical to assume the sharing costs of activities such as excavation, backfilling and surface repair between construction and removal. For example, records are not kept to determine or estimate the amount of excavation that would be required for the addition of the new pipe versus the removal of the old pipe. A joint allocation of costs is reasonable under this approach.

Under the incremental approach, the common costs for replacement projects are allocated solely to the installation of the construction project. The rationale for this approach is also compelling. When the first asset is constructed, the total cost of activities (including costs which would later be common activities in replacement projects such as mobilization, excavation, and street repair) would be charged to the installation of the asset. To consistently apply the same costs to the replacement asset on the same basis as the original asset, these



common activities should be charged to the installation of the new asset. Only those activities that would not have been necessary in the first installation would be charged as removal costs. These activities include the isolation of the pipe, cutting and capping the pipe and purging/foaming the pipe. These incremental activities would not normally be required in connecting to the end of an existing pipe.

Given the compelling logic of the incremental approach, the Company in this study has decided to move to the more conservative incremental approach to allocating removal costs for replacement projects.

# Study Results

The following table shows the existing and recommended removal cost percentages for use in allocating labor for replacement projects to removal cost. No material is allocated to removal.

Project Type	Current Removal Cost Percentage	2015 Removal Cost Percentage
Mains	Various	5.00%
Services	Various	5.00%

Projects whose scope is solely the removal of an asset would still allocate 100% of labor costs to removal cost

Project Type	Current Removal Cost Percentage	2015 Removal Cost Percentage
Mains Removal Only	100%	100%
Services Removal Only	100%	100%

## Detailed Discussion

### Detailed Process Description

The process to determine the incremental removal costs of projects included three steps: 1. determining the incremental removal cost activities, 2. conducting a time study to determine the time and cost of the incremental removal activities and 3. analyzing the results and recommending new removal cost allocations to apply to labor costs within the PowerPlan system.

Determining the incremental removal cost activities began with detailed interviews with Atmos Energy Operations personnel to determine the incremental activities associated with replacing mains and services. The West Texas Division (“WTX”) had completed a similar sample during 2011 and the list of activities used in that study for removal activities was examined. From that list and previous experience, Alliance recommended an initial list that was validated through discussions with engineering and operations, and then analyzed during the interview process to determine which activities would be solely related to the removal of assets. Following the interviews, several field visits were made to talk with crew foremen and observe main and service replacement projects. These steps confirmed the selection of three activities that would be driven by the removal of the old asset and would not generally be required in a construction project with no replacement. These three activities are:

isolating the section of line to be removed, cutting and capping the removed line (including welding the cap on the line), and purging, blowing down, or foaming the line that was removed from service.

Once the activities to be measured were determined, a sampling program was developed. A long sample period was available from a similar 2011 WTX effort. This WTX data was the baseline for starting the Atmos Energy-wide analysis and, due to its large sample size, the WTX data was heavily weighted in the selection of the final allocation percentage. It is recommended that when the analysis is updated in the future, a longer sample period be used to validate the current shorter sample. The Atmos Energy-wide process sampled 100% of the projects during the time period data was gathered. A form was created that would be included in every work order sent to the field. See attachment A for a copy of the Sampling Form.

At the initiation of the study, Company engineers held detailed briefings with all crew foremen participating in the study. The communication with each of the foremen was to explain the reason and requirements for the process and answer any questions they might have. As projects were completed, the sampling forms were captured and sent to Atmos Energy corporate offices where analysts or Alliance personnel input the information into a database. The database matches the hours spent on each activity with the average cost per person of the specific crew working on the job and calculated the total cost of the removal activities for each job. The total project cost estimates for service projects are based on the most current

weighted average cost of construction study for service lines. The total project cost for mains projects is based on the estimated cost for each specific main project. Attached in Appendix B is the detailed cost and removal expense for each project. Detailed information from the 2011 WTX sample can be found in Appendix C.

As stated above, due to the smaller sample size of the Atmos Energy-wide analysis (67 discrete Mains replacement samples and 288 discrete Services samples), the results were not weighted as heavily as the 2011 WTX data. The WTX sample size was over 2,400 discrete removal samples. The overall results did demonstrate that the removal allocation should be lower than presently used. However, there was a wide variation in percentages between projects and the resulting allocation percentages of the smaller Atmos Energy-wide sample were not definitive and lower than expected. As noted in the individual account descriptions, the larger sample size of the WTX study was relied upon more heavily in the final allocation decision.

In the following sections, the specific results for each of the categories are discussed.

## Mains

Incremental removal activities for Mains are: 1. isolating the Main, 2. cutting the old Main, and 3. blowing down/foaming the line. There were 39 Mains replacement projects with 67 discrete samples during the sample period. Using a 100% sample, the total removal cost of these activities for the 34 projects was \$36,230. The total labor cost for these projects was \$11,182,483. The project labor cost total included combined Mains and Services labor for some projects (the labor related to each category was not separated) which had the effect of reducing the removal percentage as compared to a stand-alone analysis. The percentage of labor cost associated with removal activities was less than 1%. In contrast, the WTX sample calculated a percentage of nearly 3.5% on the more robust sample and an overall Mains and Services percentage of 6.55%. Given the smaller sample and the WTX results, as well as judgment, a 5% Mains allocation factor was selected to apply against project labor cost to allocate removal cost for Mains projects.

## Services

Incremental removal activities for Services are basically the same as for Mains. The activities tracked are: 1. isolating the Service, 2. cutting, capping and welding the stub of the old Service to seal it, and 3. foaming the line and removing the old riser. There were 48 Service replacement projects with 288 discrete samples during the sample period. Using a 100% sample, the total removal cost of these activities for the 48 projects was \$41,589. The total labor cost for these projects was \$15,896,463. The project labor cost total included combined Mains and Services labor for some projects (the labor related to each category was not separated) which had the effect of reducing the removal percentage as compared to a stand-alone analysis. The percentage of labor cost associated with removal activities was less than 1%. In contrast, the WTX sample calculated a percentage of nearly 7% on the more robust sample and an overall Mains and Services percentage of 6.55%. Given the smaller sample and the WTX results, as well as judgment, a 5% Services allocation factor was selected to apply against project labor cost to allocate removal cost for Services projects.

## Appendix A Sampling Form





# Daily Replacement Data Collection Sheet

Project or Functional #: \_\_\_\_\_  
 Job Address: \_\_\_\_\_  
 City: \_\_\_\_\_  
 Employee(s): \_\_\_\_\_  
 Work Date: \_\_\_\_\_

**General Instructions:**

- Complete this form for each excavation on each replacement
- Record the Start and Stop time for each replacement activity performed.
- Attach this form to the SSD

## Replacement (Retirement) Activity

Mains		Start Time	Stop Time	# of Employees	Misc. Notes
				Involved	
Excavating (1)	1				
	2				
	3				
Isolation	1				
	2				
	3				
Capping & Purging	1				
	2				
	3				

Services		Start	Stop		Misc. Notes
Excavating (1)	1				
	2				
	3				
Isolation	1				
	2				
	3				
Capping & Purging	1				
	2				
	3				

(1) Excavating should only be recorded if it is a separate hole from the replacement pipe.  
 A common excavation with the replacement pipe should be part of the new asset.

## Appendix B Project Results

Atmos Energy Corporation  
2014 Time & Motion Study Data Collection Summary  
Study Results

Line No.	Classification	Jurisdiction	Project No.	Project Cost Excl Mat	Project Description	FERC Account(s)	Dollars						No. in Crew	Job Titles	Total RC	Calc RC	%
							Added	Retired	Excavating	Isolation	Cap & Purge	Total					
1	Replacement	Louisiana	020.17121	\$ 39,084.95	Replaced 3" Plastic Main	37602	-	60	60	120	3	crew leader, (2) distribution operators	\$ 91.51	\$ 183.02	\$ 183.02	0.47%	
2	Replacement	Louisiana	020.17122	\$ 56,909.11	Replaced 2" Plastic Main	37602	-	30	60	90	2	crew leader, construction operator	\$ 66.51	\$ 99.76	\$ 99.76	0.18%	
3	Replacement	Louisiana	020.17154	\$ 80,729.12	Replaced 2" Plastic Main	37602	-	5	75	80	3	crew leader, (2) construction operators	\$ 91.51	\$ 122.01	\$ 122.01	0.15%	
4	Replacement	Louisiana	020.29296	\$ 8,834.19	Replaced 2" Plastic Main	37602	-	30	30	60	4	crew leader, (3) construction operators	\$ 116.51	\$ 116.51	\$ 116.51	1.32%	
5	Replacement	Lafayette LA	020.29647	\$ 412,887.09		37600	295	220	45	560	2		\$ 66.51	\$ 620.72	\$ 620.72	0.15%	
6	Replacement	Louisiana	020.29657	\$ 34,863.98	Replaced 3/4" Plastic Main	37602	-	20	69	89	5	crew leader, (4) construction operators	\$ 141.51	\$ 209.91	\$ 209.91	0.60%	
8	Replacement	Kansas	060.23486	\$ 164,081.00	Replaced 2" Steel Main	37601	-	120	10	130	2	crew leader, construction operator	\$ 66.51	\$ 144.10	\$ 144.10	0.09%	
9	Replacement	Kansas	060.31316	\$ 1,115.95	Replaced 2" Plastic Main	37602	-	30	225	255	2	crew leader, construction operator	\$ 66.51	\$ 282.65	\$ 282.65	25.33%	
10	Replacement	Kansas	060.31377	\$ 7,258.09	Replaced 1.25" Plastic Main	37602	-	-	15	15	2	crew leader, construction operator	\$ 66.51	\$ 16.63	\$ 16.63	0.23%	
14	Replacement	MS	070.15130	\$ 375,871.93	replace 1" steel line with 1/2" plastic	36701	120	-	2	122	5	crew leader, (4) construction operators	\$ 141.51	\$ 287.75	\$ 456.23	0.12%	
15	Replacement	MS	070.15130		replace 1" steel line with 1/2" plastic	36701	60	14	2	76	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 168.48			
16	Replacement	Houston MS	070.15141	\$ 8,938.67		37600	120	360	360	840	2		\$ 66.51	\$ 931.08	\$ 931.08	10.42%	
17	Replacement	Tupelo MS	070.15166	\$ 43,934.82		37600	30	25	90	145	3		\$ 91.51	\$ 221.15	\$ 437.29	1.00%	
18	Replacement	Tupelo MS	070.15166			37600	75	15	105	195	2		\$ 66.51	\$ 216.14			
19	Replacement	MS	070.15173	\$ 24,291.16	replace 2" plastic line	36701	150	-	-	150	2	Crew lead and Construction Operator	\$ 66.51	\$ 166.26	\$ 166.26	0.68%	
20	Replacement	Hollandale MS	070.15201	\$ 151,545.75		37600	35	62	57	154	4		\$ 133.01	\$ 341.39	\$ 722.69	0.48%	
21	Replacement	MS	070.15201		replace 2" cast iron pipe with 2" steel pipe	36701	39	7	24	70	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 155.18			
22	Replacement	MS	070.15201		replace 2" plastic line	36701	36	66	-	102	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 226.12			
24	Replacement	Lexington MS	070.15221	\$ 46,062.95		37600	95	15	15	125	3		\$ 91.51	\$ 190.64	\$ 190.64	0.41%	
25	Replacement	MS	070.15245	\$ 65,166.02	replace 3" plastic line	36701	120	90	-	210	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 320.28	\$ 320.28	0.49%	
26	Replacement	Flora	070.15229	\$ 259,933.75		37600	0	15	5	20	2		\$ 66.51	\$ 22.17	\$ 99.25	0.04%	
27	Replacement	Mississippi	070.15229		Replaced 2" P. E. Main	37602	-	6	6	6	2	(2) construction operators	\$ 50.01	\$ 5.00			
28	Replacement	Mississippi	070.15229		Replaced 2" P. E. Main	37602	-	2	30	32	3	crew leader, (2) construction operators	\$ 91.51	\$ 48.80			
29	Replacement	Mississippi	070.15229		Replaced 2" Plastic Main	37602	-	16	5	21	2	crew leader, construction operator	\$ 66.51	\$ 23.28			
30	Replacement	Tupelo MS	070.15237	\$ 177,348.45		37600	0	240	120	360	1		\$ 25.00	\$ 150.02	\$ 150.02	0.08%	
31	Replacement	Tupelo MS	070.15238	\$ 145,001.15		37600	0	240	120	360	1		\$ 25.00	\$ 150.02	\$ 150.02	0.10%	
32	Replacement	Amory	070.15241	\$ 173,216.46		37600	0	180	210	390	1		\$ 25.00	\$ 162.52	\$ 3,289.80	1.90%	
33	Replacement	Amory	070.15241			37600	0	300	120	420	10		\$ 316.03	\$ 2,212.19			
34	Replacement	Mississippi	070.15241		replaced 2" steel main - leak	37601	-	180	-	180	3	crew leader, (2) construction operators	\$ 91.51	\$ 274.53			
35	Replacement	Mississippi	070.15241		replaced 2" steel main - leak	37601	-	240	-	240	3	crew leader, (2) construction operators	\$ 91.51	\$ 366.03			
36	Replacement	Mississippi	070.15241		replaced 2" steel main with 2" plastic	37601	-	180	-	180	3	crew leader, (2) construction operators	\$ 91.51	\$ 274.53			
37	Replacement	Mississippi	070.15250	\$ 103,404.81	Replaced 2" Plastic Main	37602	-	30	30	60	2	(2) construction operators	\$ 50.01	\$ 50.01	\$ 50.01	0.05%	
38	Replacement	Southaven MS	070.15261	\$ 81,574.75		37600	90	120	10	220	3		\$ 91.51	\$ 335.53	\$ 1,616.65	1.98%	
39	Replacement	Mississippi	070.15261		Replaced 4" Steel Main	37601	-	120	300	420	6	(2) crew leaders, (4) construction operators	\$ 183.02	\$ 1,281.12			
40	Replacement	Mississippi	070.15262	\$ 128,292.41	replaced 2" steel main	37601	-	-	240	240	3	(2) crew leaders, construction operator	\$ 108.01	\$ 432.03	\$ 432.03	0.34%	
41	Replacement	Richardson TX	080.33174	\$ 283,850.20		37600	0	80	15	95	4		\$ 133.01	\$ 210.60	\$ 210.60	0.07%	
42	Replacement	Mid-Tex	080.33178	\$ 197,692.77	replaced 5 ft. of 3" plastic main	37602	-	180	30	210	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 465.54	\$ 465.54	0.24%	
43	Replacement	Irving TX	080.33181	\$ 133,851.09		37600	240	30	15	285	3		\$ 91.51	\$ 434.67	\$ 1,212.49	0.91%	
44	Replacement	Mid-Tex	080.33181		replaced 2" pipe	37601	95	111	2	208	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 317.23			
45	Replacement	Mid-Tex	080.33181		replaced 6" poly	37601	39	262	1	302	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 460.59			
48	Replacement	Mid-Tex	080.33350	\$ 3,789,119.10	N/A	37601	180	-	-	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53	\$ 549.05	0.01%	
49	Replacement	Mid-Tex	080.33350		N/A	37601	180	-	-	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53			
46	Replacement	Wichita Falls TX	080.33354	\$ 1,786,787.73		37600	120	60	60	240	3		\$ 91.51	\$ 366.03	\$ 442.29	0.02%	
47	Replacement	Archer City TX	080.33354			37600	0	30	20	50	3		\$ 91.51	\$ 76.26			
50	Replacement	Arlington TX	080.33358	\$ 1,643,961.79		37600	95	52	5	152	3		\$ 91.51	\$ 231.82	\$ 5,526.29	0.34%	
51	Replacement	Irving TX	080.33358			37600	55	1	55	111	5		\$ 158.01	\$ 292.33			
52	Replacement	Mid-Tex	080.33358		replaced 1/2" plastic pipe	37601	210	120	240	570	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 869.33			
53	Replacement	Mid-Tex	080.33358		replaced 2" plastic pipe	37601	450	240	30	720	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 1,596.13			
54	Replacement	Mid-Tex	080.33358		replaced 2" plastic pipe	37601	80	30	75	185	5	2 crew leader, (3) construction operators	\$ 158.01	\$ 487.21			
55	Replacement	Mid-Tex	080.33358		replaced 2" steel pipe with 2" plastic	37601	240	30	25	295	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 653.97			
56	Replacement	Mid-Tex	080.33358		replaced 3/4" plastic pipe	37601	285	360	270	915	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 1,395.50			
57	Replacement	Mid-Tex	080.41929	\$ 521,067.10	N/A	37601	300	-	-	300	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 665.05	\$ 1,534.13	0.29%	
58	Replacement	Mid-Tex	080.41929		N/A	37601	330	-	-	330	5	2 crew leader, (3) construction operators	\$ 158.01	\$ 869.08			
59	Replacement	Mid-Tex	080.43736	\$ 45,234.71		37601	630	-	-	630	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 960.84	\$ 1,921.68	4.25%	
60	Replacement	Mid-Tex	080.43736		replaced 2" main	37601	630	-	-	630	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 960.84			
61	Replacement	Olney TX	080.44246	\$ 39,511.16		37600	300	240	75	615	3		\$ 91.51	\$ 937.96	\$ 937.96	2.37%	
62	Replacement	Mid-Tex	080.44362	\$ 14,846.80	replaced 2" plastic pipe	37601	60	65	-	125	2	Crew lead and Construction Operator	\$ 66.51	\$ 138.55	\$ 138.55	0.93%	
63	Replacement	Mid-Tex	080.44874	\$ 136,213.59		37601	630	-	-	630	2	Crew lead and Construction Operator	\$ 66.51	\$ 698.31	\$ 10,053.18	7.38%	
64	Replacement	Mid-Tex	080.44874		replace 4" main	37601	600	-	-	600	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 915.08			
65	Replacement	Mid-Tex	080.44874		replace 4" main	37601	600	-	-	600	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 915.08			
66	Replacement	Mid-Tex	080.44874		replace 4" main	37601	1,080	-	-	1,080	5	2 crew leader, (3) construction operators	\$ 158.01	\$ 2,844.25			
67	Replacement	Mid-Tex	080.44874		replace 4" main	37601	1,350	-	-	1,350	7	2 crew leader, (5) construction operators	\$ 208.02	\$ 4,680.45			
				\$ 11,182,482.60									\$ 33,799.30		0.30%		
1	Replacement	Louisiana	020.17122	\$ 56,909.11	Replaced 1" Plastic Service	38000	-	180	75	255	4	crew leader, distribution operator, construction operator	\$ 108.49	\$ 461.10	\$ 1,675.30	2.94%	
2	Replacement	Louisiana	020.17122		Replaced 1" Plastic Service	38000	-	30	60	90	3	crew leader, distribution operator, construction operator	\$ 108.49	\$ 162.74			
3	Replacement	Louisiana	020.17122		Replaced 1" Steel Service	38000	-	120	60	180	3	crew leader, distribution operator, construction operator	\$ 108.49	\$ 325.48			
4	Replacement	Louisiana	020.17122		Replaced 3/4" Plastic Service	38000	-	90	90	180	2	crew leader, distribution operator	\$ 83.49	\$ 250.47			
5	Replacement	Louisiana	020.17122		Replaced 3/4" Steel Service	38000	-	90	90	180	2	distribution operator, construction operator	\$ 66.99	\$ 200.98			
6	Replacement	Louisiana	020.17122		Replaced 3/4" Plastic Service	38000	-	90	90	180	3	crew leader, (2) construction operators	\$ 91.51	\$ 274.53			
7	Replacement	Louisiana	020.17157	\$ 221,550.62	Replaced 1" Steel Service	38000	-	60	60	120	3	crew leader, (2) construction operators	\$ 91.51	\$ 183.02	\$ 1,529.21	0.69%	
8	Replacement	Louisiana	020.17157		Replaced 3/4" Plastic Service	38000	-	60	30	90	3	crew leader, (2) construction operators	\$ 91.51</				

Atmos Energy Corporation  
2014 Time & Motion Study Data Collection Summary  
Study Results

Line No.	Classification	Jurisdiction	Project No.	Project Cost Excl Mat	Project Description	FERC Account(s)	Dollars					No. in Crew	Job Titles	Total RC	Calc RC	%	
							Added	Retired	Excavating	Isolation	Cap & Purge						Total
10	Replacement	Louisiana	020.17157		Replaced 2" Plastic Service	38000				60	120	3	distribution operator, (2) construction operators	\$ 92.00	\$ 183.99		
11	Replacement	Louisiana	020.17157		Replaced 3/4" Plastic Service	38000				5	20	3	crew leader, distribution operator, construction operator	\$ 108.49	\$ 45.21		
12	Replacement	Louisiana	020.17157		Replaced 1" Steel Service	38000				15	60	3	crew leader, (2) construction operators	\$ 91.51	\$ 114.39		
13	Replacement	Louisiana	020.17157		Replaced 1" Steel Service	38000				60	120	3	crew leader, (2) construction operators	\$ 91.51	\$ 183.02		
14	Replacement	Louisiana	020.17157		Replaced 1" Steel Service	38000				60	120	3	crew leader, (2) construction operators	\$ 91.51	\$ 183.02		
15	Replacement	Louisiana	020.17157		Replaced 1" Steel Service	38000				5	10	3	crew leader, (2) construction operators	\$ 91.51	\$ 15.25		
16	Replacement	Louisiana	020.17157		Replaced 1" Steel Service	38000				90	90	2	(2) construction operators	\$ 50.01	\$ 75.01		
17	Replacement	Louisiana	020.17157		Replaced 1.25" Plastic Service	38000				60	60	4	distribution operator, (3) construction operators	\$ 117.00	\$ 117.00		
18	Replacement	Louisiana	020.17157		Replaced 1" Plastic Service	38000				5	30	3	crew leader, distribution operator, construction operator	\$ 108.49	\$ 63.29		
19	Replacement	Louisiana	020.17157		Replaced 3/4" Steel Service	38000				30	60	3	crew leader, (2) construction operators	\$ 91.51	\$ 91.51		
20	Replacement	Monroe LA	020.17232	\$ 33,676.42		38000		86	4	60	150	3		\$ 91.51	\$ 228.77	\$ 228.77	0.68%
21	Replacement	Terrytown?	020.17267	\$ 186,988.83		38000		60	10	20	90	4		\$ 133.01	\$ 199.52	\$ 199.52	0.11%
22	Replacement	Illegible	020.17269	\$ 179,417.85		38000		110	20	60	190	3		\$ 91.51	\$ 289.78	\$ 289.78	0.16%
23	Replacement	Lafayette LA	020.26087	\$ 51,494.79		38000		360	120	120	600	4		\$ 133.01	\$ 1,330.11	\$ 1,330.11	2.58%
24	Replacement	Louisiana	020.29657	\$ 34,863.98	Replaced 3/4" Plastic Service	38000			45	30	75	5	crew leader, (4) construction operators	\$ 141.51	\$ 176.89	\$ 176.89	0.51%
27	Replacement	Kentucky	050.23724	\$ 34,784.94	replaced 3/4" plastic service	38000		60	15	10	85	2	Crew lead and Construction Operator	\$ 66.51	\$ 94.22	\$ 94.22	0.27%
28	Replacement	Tennessee	050.23741	\$ 58,128.33	removed 3/4" steel service	38000				120	120	2	Crew lead and Construction Operator	\$ 66.51	\$ 133.01	\$ 299.27	0.51%
29	Replacement	Tennessee	050.23741		removed 3/4" steel service	38000				150	150	2	Crew lead and Construction Operator	\$ 66.51	\$ 166.26		
30	Replacement	Kentucky	050.23754	\$ 172,312.81	move 1.25" service line	38000		15	35	30	80	2	Crew lead and Construction Operator	\$ 66.51	\$ 88.67	\$ 88.67	0.05%
31	Replacement	Kentucky	050.23762	\$ 78,003.80	relocated 1.25" steel mill wrapped service line	38000		60	60	120	240	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 366.03	\$ 860.25	1.10%
32	Replacement	Kentucky	050.23762		removed 3/4" line and relocated new 3/4" plastic	38000		120	90	45	255	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 388.91		
33	Replacement	Kentucky	050.23762		replaced 3/4" plastic service	38000			75	-	75	2	crew leader, construction operator	\$ 66.51	\$ 83.13		
34	Replacement	Kentucky	050.23762		replaced 3/4" plastic service	38000				20	20	2	crew leader, sr. construction operator	\$ 66.51	\$ 22.17		
35	Replacement	Kentucky	050.23763	\$ 92,161.47	relocated 1" service by adding 3/4" to moved service	38000		10	2	2	14	2	Crew lead and Construction Operator	\$ 66.51	\$ 15.52	\$ 573.84	0.62%
36	Replacement	Kentucky	050.23763		relocated 1" service line	38000		5	1	2	8	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 12.20		
37	Replacement	Kentucky	050.23763		replaced 3/4" plastic service line	38000			1	3	4	2	distribution operator, construction operator	\$ 66.99	\$ 4.47		
38	Replacement	Kentucky	050.23763		retired 3/4" plastic service	38000			1	4	5	3	distribution operator, (2) construction operators	\$ 92.00	\$ 7.67		
39	Replacement	Kentucky	050.23763		retired 3/4" plastic service and replaced 3/4" plastic srvc.	38000			14	226	240	4	crew leader, distribution operator, (2) construction operators	\$ 133.50	\$ 533.99		
40	Replacement	Kansas	060.23483	\$ 236,571.65	Replaced 1/2" Plastic Service	38000			15	25	40	2	crew leader, construction operator	\$ 66.51	\$ 44.34	\$ 57.64	0.02%
41	Replacement	Kansas	060.23483		Replaced 3/4" Plastic Service	38000				5	5	2	crew leader, construction operator	\$ 66.51	\$ 5.54		
42	Replacement	Kansas	060.23483		Replaced 3/4" Plastic Service	38000				2	7	2	crew leader, construction operator	\$ 66.51	\$ 7.76		
43	Replacement	Kansas	060.23485	\$ 186,548.15	replaced 1 1/4" steel service with 3/4" plastic service	38000				60	60	1	Construction Operator only	\$ 25.00	\$ 25.00	\$ 101.93	0.05%
44	Replacement	Kansas	060.23485		replaced 1" PE service with 1" PE service	38000			5	5	10	1	Construction Operator only	\$ 25.00	\$ 4.17		
45	Replacement	Kansas	060.23485		replaced 1" PE service with 3/4" PE service	38000				15	15	1	Construction Operator only	\$ 25.00	\$ 6.25		
46	Replacement	Kansas	060.23485		replaced 3/4" PE service with 1/2" PE service	38000				60	60	2	Crew lead and Construction Operator	\$ 66.51	\$ 66.51		
47	Replacement	Kansas	060.23487	\$ 207,334.20	replaced 1" bare steel service with 1" PE service	38000			5	5	10	1	Construction Operator only	\$ 25.00	\$ 4.17	\$ 424.99	0.20%
48	Replacement	Kansas	060.23487		replaced 1" bare steel service with 3/4" PE service	38000				15	15	1	Construction Operator only	\$ 25.00	\$ 6.25		
49	Replacement	Kansas	060.23487		replaced 1" bare steel service with 3/4" PE service	38000				60	60	1	Construction Operator only	\$ 25.00	\$ 25.00		
50	Replacement	Kansas	060.23487		replaced 3/4" PE service with 3/4" PE service	38000				5	5	1	Construction Operator only	\$ 25.00	\$ 2.08		
51	Replacement	Kansas	060.23487		Replaced 1" Steel Service	38000			180	30	210	3	crew leader, distribution operator, construction operator	\$ 108.49	\$ 379.73		
52	Replacement	Kansas	060.23487		Replaced 1" Plastic Service	38000			2	5	7	2	crew leader, construction operator	\$ 66.51	\$ 7.76		
53	Replacement	Kansas	060.23499	\$ 12,644.63	Replaced 1" Steel Service	38000			15	25	40	4	(3) distribution operators, construction operator	\$ 150.97	\$ 100.65	\$ 100.65	0.80%
54	Replacement	Kansas	060.23503	\$ 45,995.99	Replaced 3/4" Plastic Service	38000			8	-	8	3	(3) distribution operators	\$ 125.97	\$ 16.80	\$ 407.29	0.89%
55	Replacement	Kansas	060.23503		Replaced 1" Plastic Service	38000			21	25	46	3	(3) distribution operators	\$ 125.97	\$ 96.57		
56	Replacement	Kansas	060.23503		Replaced 3/4" Plastic Service	38000			22	43	65	3	(3) distribution operators	\$ 125.97	\$ 136.46		
57	Replacement	Kansas	060.23503		Replaced 3/4" Plastic Service	38000			25	50	75	3	(3) distribution operators	\$ 125.97	\$ 157.46		
58	Replacement	Kansas	060.30334	\$ 450,357.62	replaced 1" bare steel service with 3/4" plastic service	38000			15	-	15	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 22.88	\$ 2,664.66	0.59%
59	Replacement	Kansas	060.30334		replaced 1" bare steel service with 3/4" plastic service	38000			20	-	20	1	Construction Operator only	\$ 25.00	\$ 8.33		
60	Replacement	Kansas	060.30334		replaced 1" steel yard line with 3/4" plastic	38000				5	5	2	Crew lead and Construction Operator	\$ 66.51	\$ 5.54		
61	Replacement	Kansas	060.30334		replaced 1.25" bare steel service with 3/4" plastic service	38000			5	-	5	1	Construction Operator only	\$ 25.00	\$ 2.08		
62	Replacement	Kansas	060.30334		replaced 1.25" steel line with 3/4" plastic	38000				5	5	2	Crew lead and Construction Operator	\$ 66.51	\$ 5.54		
63	Replacement	Kansas	060.30334		replaced 1.25" steel line with 3/4" plastic	38000				5	5	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 7.63		
64	Replacement	Kansas	060.30334		replaced 1.25" steel line with 3/4" plastic	38000				19	19	2	Crew lead and Construction Operator	\$ 66.51	\$ 21.06		
65	Replacement	Kansas	060.30334		replaced 1/2" PE service with 1/2" PE service	38000			28	-	28	2	Crew lead and Construction Operator	\$ 66.51	\$ 31.04		
66	Replacement	Kansas	060.30334		replaced 3/4" PE service with 1/2" PE service	38000			26	-	26	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 39.65		
67	Replacement	Kansas	060.30334		replaced 3/4" PE service with 3/4" PE service	38000			18	-	18	2	Crew lead and Construction Operator	\$ 66.51	\$ 19.95		
68	Replacement	Kansas	060.30334		replaced 3/4" PE service with 3/4" PE service	38000			33	-	33	2	Crew lead and Construction Operator	\$ 66.51	\$ 36.58		
69	Replacement	Kansas	060.30334		replaced 3/4" plastic yard line	38000			5	-	5	2	Crew lead and Construction Operator	\$ 66.51	\$ 5.54		
70	Replacement	Bonner Springs	060.30334			38000		85	5	0	90	3		\$ 91.51	\$ 137.26		
71	Replacement	Bonner Springs	060.30334			38000		230	5	0	235	3		\$ 91.51	\$ 358.41		
72	Replacement	Bonner Springs	060.30334			38000		320	5	0	325	2		\$ 66.51	\$ 360.24		
73	Replacement	Bonner Springs	060.30334			38000		346	5	0	351	3		\$ 91.51	\$ 535.32		
74	Replacement	Bonner Springs	060.30334			38000		325	5	0	330	3		\$ 91.51	\$ 503.30		
75	Replacement	Bonner Springs	060.30334			38000		365	5	0	370	3		\$ 91.51	\$ 564.30		
78	Replacement	Mississippi	070.15130	\$ 375,871.93	replace 1" steel line with 1/2" plastic	38000		21	22	-	43	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 95.32	\$ 1,112.86	0.30%
79	Replacement	Mississippi	070.15130		replace 1" steel line with 1/2" plastic	38000		96	6	34	136	5	2 crew leader, (3) construction operators	\$ 158.01	\$ 358.16		
80	Replacement	Mississippi	070.15130		replace 1" steel line with 1/2" plastic	38000		96	6	34	136	5	2 crew leader, (3) construction operators	\$ 158.01	\$ 358.16		
81	Replacement	Mississippi	070.15130		replace 1" steel line with 1/2" plastic	38000		43	9	1	53	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 117.49		
82	Replacement	Mississippi	070.15130		Replaced 1" Steel Service	38000			2	-	2	2	crew leader, construction operator	\$ 66.51	\$ 2.22		
83	Replacement	Mississippi	070.15130		Replaced 1" Steel Service	38000		31	16	2	49	3	crew leader, (2) construction operators	\$ 91.51	\$ 74.73		
84	Replacement	Mississippi	070.15130		Replaced 1" Steel Service	38000		34	19	17	70	3	crew leader, (2) construction operators	\$ 91.51	\$ 106.76		
85	Replacement	Mississippi	070.15138	\$ 44,963.75	Replaced 3/4" Plastic Service	38000				30	30	3	crew leader, (2) construction operators	\$ 91.51	\$ 45.75	\$ 45.75	0.10%
86	Replacement	Mississippi	070.15142	\$ 24,724.95	Replaced 1" Steel Service	38000		15	30	35	80	3	crew leader, (2) construction operators	\$ 91.51	\$ 122.01</		

Atmos Energy Corporation  
2014 Time & Motion Study Data Collection Summary  
Study Results

Line No.	Classification	Jurisdiction	Project No.	Project Cost Excl Mat	Project Description	FERC Account(s)	Dollars					Removal Activity Time (in minutes)			No. in Crew	Job Titles	Total RC	Calc RC	% RC	
							Added	Retired	Excavating	Isolation	Cap & Purge	Total	Added	Retired						Excavating
90	Replacement	MS	070.15154	\$ 59,271.82	replace 1/2" plastic line	38000					30	30	30	90	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 137.26	\$ 274.53	0.46%
91	Replacement	MS	070.15154		replace 1/2" plastic line	38000					45	15	30	90	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 137.26		
92	Replacement	Mississippi	070.15158	\$ 853,470.79	Replaced 1" Steel Service	38000					75	5	30	110	2	crew leader, construction operator	\$ 66.51	\$ 121.93	\$ 1,476.95	0.17%
93	Replacement	Mississippi	070.15158		Replaced 1" Steel Service	38000					-	7	18	25	3	crew leader, (2) construction operators	\$ 91.51	\$ 38.13		
94	Replacement	Mississippi	070.15158		Replaced 3/4" Steel Service	38000					-	12	17	29	2	crew leader, construction operator	\$ 66.51	\$ 32.14		
95	Replacement	Mississippi	070.15158		Replaced 1" Steel Service	38000					-	71	19	90	3	crew leader, (2) construction operators	\$ 91.51	\$ 137.26		
96	Replacement	Mississippi	070.15158		Replaced 1" Steel Service	38000					-	7	70	77	3	crew leader, (2) construction operators	\$ 91.51	\$ 117.44		
97	Replacement	Mississippi	070.15158		Replaced 3/4" Steel Service	38000					-	12	17	29	2	crew leader, construction operator	\$ 66.51	\$ 32.14		
98	Replacement	Mississippi	070.15158		Replaced 1" Steel Service	38000					-	9	17	26	2	crew leader, construction operator	\$ 66.51	\$ 28.82		
99	Replacement	Jackson	070.15158			38000					0	12	16	28	3		\$ 91.51	\$ 42.70		
100	Replacement	Jackson	070.15158			38000					0	12	20	32	3		\$ 91.51	\$ 48.80		
101	Replacement	Jackson	070.15158			38000					0	12	17	29	3		\$ 91.51	\$ 44.23		
102	Replacement	Jackson	070.15158			38000					0	10	21	31	3		\$ 91.51	\$ 47.28		
103	Replacement	Jackson	070.15158			38000					0	5	40	45	4		\$ 133.01	\$ 99.76		
104	Replacement	Jackson	070.15158			38000					0	16	15	31	3		\$ 91.51	\$ 47.28		
105	Replacement	Jackson	070.15158			38000					0	11	18	29	3		\$ 91.51	\$ 44.23		
106	Replacement	Jackson	070.15158			38000					0	30	40	70	3		\$ 91.51	\$ 106.76		
107	Replacement	Jackson	070.15158			38000					0	30	35	65	3		\$ 91.51	\$ 99.13		
108	Replacement	Jackson	070.15158			38000					0	30	35	65	3		\$ 91.51	\$ 99.13		
109	Replacement	Jackson	070.15158			38000					0	30	35	65	3		\$ 91.51	\$ 99.13		
110	Replacement	Jackson	070.15158			38000					0	30	45	75	3		\$ 91.51	\$ 114.39		
111	Replacement	Jackson	070.15158			38000					0	20	30	50	3		\$ 91.51	\$ 76.26		
112	Replacement	MS	070.15174	\$ 52,960.80	replace 1/2" plastic line	38000					60	-	-	60	2	Crew lead and Construction Operator	\$ 66.51	\$ 66.51	\$ 66.51	0.13%
113	Replacement	Mississippi	070.15178	\$ 161,494.51	replaced 1" steel service with 1/2" plastic service	38000					-	15	35	50	2	crew leader, construction operator	\$ 66.51	\$ 55.42	\$ 55.42	0.03%
114	Replacement	Mississippi	070.15194	\$ 92,574.51	Replaced 1" Steel Service	38000					75	-	-	75	2	(2) crew leaders	\$ 83.00	\$ 103.76	\$ 103.76	0.11%
115	Replacement	Mississippi	070.15202	\$ 71,725.84	Replaced 1" Steel Service	38000					-	1	-	1	2	crew leader, construction operator	\$ 66.51	\$ 1.11	\$ 5.54	0.01%
116	Replacement	Mississippi	070.15202		Replaced 1" Steel Service	38000					-	2	-	2	2	crew leader, construction operator	\$ 66.51	\$ 2.22		
117	Replacement	Mississippi	070.15202		Replaced 1" Steel Service	38000					-	2	-	2	2	crew leader, construction operator	\$ 66.51	\$ 2.22		
118	Replacement	MS	070.15206	\$ 18,291.12	replace 1" steel line with 1/2" plastic	38000					120	30	-	150	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 228.77	\$ 262.02	1.43%
119	Replacement	Mississippi	070.15206		replaced 1" steel service with 1/2" plastic service	38000					-	-	30	30	2	crew leader, utility worker	\$ 66.51	\$ 33.25		
120	Replacement	MS	070.15210	\$ 32,561.44	replace 1" steel pipe with 1/2" plastic	38000					60	-	30	90	2	Crew lead and Construction Operator	\$ 66.51	\$ 99.76	\$ 115.01	0.35%
121	Replacement	Mississippi	070.15210		Replaced 3/4" Plastic Service	38000					-	-	10	10	3	crew leader, (2) construction operators	\$ 91.51	\$ 15.25		
122	Replacement	Yazoo City	070.15218	\$ 69,731.58		38000					0	9	9	18	2		\$ 66.51	\$ 19.95	\$ 19.95	0.03%
123	Replacement	Mississippi	070.15222	\$ 109,444.29	replace 1/2" service line	38000					-	30	30	60	3	crew leader, (2) construction operators	\$ 91.51	\$ 91.51	\$ 91.51	0.08%
124	Replacement	MS	070.15226	\$ 174,226.02	replace 1" steel with 1/2" plastic	38000					30	30	30	90	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 137.26	\$ 1,214.01	0.70%
125	Replacement	MS	070.15226		replace 3/4" steel with 1/2" plastic	38000					60	30	30	120	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 183.02		
126	Replacement	Mississippi	070.15226		Replaced Service	38000					30	45	15	90	3	crew leader, (2) construction operators	\$ 91.51	\$ 137.26		
127	Replacement	Mississippi	070.15226		Replaced Service	38000					60	45	15	120	3	crew leader, (2) construction operators	\$ 91.51	\$ 183.02		
128	Replacement	Mississippi	070.15226		Replaced Service	38000					60	45	15	120	3	crew leader, (2) construction operators	\$ 91.51	\$ 183.02		
129	Replacement	Mississippi	070.15226		Replaced Service	38000					-	11	18	29	3	crew leader, (2) construction operators	\$ 91.51	\$ 44.23		
130	Replacement	Mississippi	070.15226		Replaced Service	38000					-	30	30	60	3	crew leader, (2) construction operators	\$ 91.51	\$ 91.51		
131	Replacement	Mississippi	070.15226		Replaced Service	38000					-	13	26	39	3	crew leader, (2) construction operators	\$ 91.51	\$ 59.48		
132	Replacement	Mississippi	070.15226		Replaced Service	38000					-	13	20	33	3	crew leader, (2) construction operators	\$ 91.51	\$ 50.33		
133	Replacement	Mississippi	070.15226		Replaced Service	38000					-	12	24	36	3	crew leader, (2) construction operators	\$ 91.51	\$ 54.91		
134	Replacement	Mississippi	070.15226		Replaced Service	38000					-	7	20	27	3	crew leader, (2) construction operators	\$ 91.51	\$ 41.18		
135	Replacement	Mississippi	070.15226		Replaced Service	38000					-	9	23	32	3	crew leader, (2) construction operators	\$ 91.51	\$ 48.80		
136	Replacement	Jackson	070.15229	\$ 259,933.75		38000					0	300	90	390	5		\$ 158.01	\$ 1,027.09	\$ 1,149.73	0.44%
137	Replacement	Jackson	070.15229			38000					0	45	0	45	4		\$ 133.01	\$ 99.76		
138	Replacement	Jackson	070.15229			38000					0	10	5	15	3		\$ 91.51	\$ 22.88		
139	Replacement	Mississippi	070.15230	\$ 954,547.69	Replaced 1" Steel Service	38000						60	15	75	2	(2) crew leaders	\$ 83.00	\$ 103.76	\$ 3,259.14	0.34%
140	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					76	4	10	90	3	crew leader, (2) construction operators	\$ 91.51	\$ 137.26		
141	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					2	9	11	3	3	crew leader, (2) construction operators	\$ 91.51	\$ 16.78		
142	Replacement	Mississippi	070.15230		Replaced 1/2" Plastic Service	38000					5	5	10	2	2	construction operators	\$ 50.01	\$ 8.33		
143	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					5	10	15	2	2	construction operators	\$ 50.01	\$ 12.50		
144	Replacement	Mississippi	070.15230		Replaced 3/4" Plastic Service	38000					5	5	10	2	2	construction operators	\$ 50.01	\$ 8.33		
145	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					5	10	15	2	2	construction operators	\$ 50.01	\$ 12.50		
146	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					2	9	11	3	3	crew leader, (2) construction operators	\$ 91.51	\$ 16.78		
147	Replacement	Mississippi	070.15230		Replaced 1 1/4" Steel Service	38000					30	60	90	3	3	crew leader, (2) construction operators	\$ 91.51	\$ 137.26		
148	Replacement	Mississippi	070.15230		Replaced 1/2" Plastic Service	38000					15	10	25	2	2	crew leader, construction operator	\$ 66.51	\$ 27.71		
149	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					10	4	14	3	3	crew leader, (2) construction operators	\$ 91.51	\$ 21.35		
150	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					10	10	20	3	3	crew leader, (2) construction operators	\$ 91.51	\$ 30.50		
151	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					5	5	10	3	3	crew leader, (2) construction operators	\$ 91.51	\$ 15.25		
152	Replacement	Mississippi	070.15230		Replaced 3/4" Steel Service	38000					5	10	15	3	3	(3) construction operators	\$ 75.01	\$ 18.75		
153	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					10	10	20	4	4	crew leader, (3) construction operators	\$ 116.51	\$ 38.84		
154	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					30	30	60	3	3	crew leader, (2) construction operators	\$ 91.51	\$ 91.51		
155	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					10	10	20	2	2	crew leader, construction operator	\$ 66.51	\$ 22.17		
156	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000														

Atmos Energy Corporation  
2014 Time & Motion Study Data Collection Summary  
Study Results

Line No.	Classification	Jurisdiction	Project No.	Project Cost Excl Mat	Project Description	FERC Account(s)	Dollars					Removal Activity Time (in minutes)		No. in Crew	Job Titles	Total RC	Calc RC	%	
							Added	Retired	Excavating	Isolation	Cap & Purge	Total							
167	Replacement	Mississippi	070.15230		Replaced 3/4" Steel Service	38000					20	38	58	3	crew leader, (2) construction operators	\$ 91.51	\$ 88.46		
168	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					15	45	60	2	crew leader, construction operator	\$ 66.51	\$ 66.51		
169	Replacement	Mississippi	070.15230		Replaced 1/2" Plastic Service	38000					30	15	45	3	crew leader, (2) construction operators	\$ 91.51	\$ 68.63		
170	Replacement	Mississippi	070.15230		Replaced 1/2" Plastic Service	38000					69	15	84	3	crew leader, (2) construction operators	\$ 91.51	\$ 128.11		
171	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					5	9	14	3	crew leader, (2) construction operators	\$ 91.51	\$ 21.35		
172	Replacement	Mississippi	070.15230		Replaced 3/4" Steel Service	38000					15	15	30	5	crew leader, (4) construction operators	\$ 141.51	\$ 70.76		
173	Replacement	Mississippi	070.15230		Replaced 3/4" Steel Service	38000					15	15	30	2	crew leader (14040), construction operator (19569)	\$ 66.51	\$ 33.25		
174	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					15	30	45	4	crew leaders (14040, 13821), construction operators (25521, 19558)	\$ 133.01	\$ 99.76		
175	Replacement	Mississippi	070.15230		Replaced 3/4" Steel Service	38000					35	20	55	2	crew leader (14040), construction operator (25521)	\$ 66.51	\$ 60.96		
176	Replacement	Mississippi	070.15230		Replaced 1/2" Plastic Service	38000					-	30	30	3	crew leader (14040), construction operators (19561, 25505)	\$ 91.51	\$ 45.75		
177	Replacement	Mississippi	070.15230		Replaced 1/2" Plastic Service	38000					15	15	30	3	crew leader (14040), construction operators (19569, 13823)	\$ 91.51	\$ 45.75		
178	Replacement	Mississippi	070.15230		Replaced 1/2" Plastic Service	38000					15	10	25	3	crew leader (14040), construction operators (19569, 13823)	\$ 91.51	\$ 38.13		
179	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					15	30	45	2	crew leader (14040), construction operator (24782)	\$ 66.51	\$ 49.88		
180	Replacement	Mississippi	070.15230		Replaced 1" Steel Service	38000					2	110	112	3	crew leader (13841), construction operators (25505, 24825)	\$ 91.51	\$ 170.82		
181	Replacement	Jackson	070.15230			38000					90	15	5	110	3		\$ 91.51	\$ 167.77	
182	Replacement	Jackson	070.15230			38000					0	50	15	65	2		\$ 66.51	\$ 72.05	
183	Replacement	Jackson	070.15230			38000					0	65	20	85	2		\$ 66.51	\$ 94.22	
184	Replacement	Jackson	070.15230			38000					0	15	12	27	2		\$ 66.51	\$ 29.93	
185	Replacement	Jackson	070.15230			38000					0	3	2	5	3		\$ 91.51	\$ 7.63	
186	Replacement	Jackson	070.15230			38000					0	15	20	35	2		\$ 66.51	\$ 38.79	
187	Replacement	Jackson/Minds	070.15230			38000					40	40	45	125	4		\$ 133.01	\$ 277.11	
188	Replacement	Clinton MS	070.15230			38000					0	5	8	13	3		\$ 91.51	\$ 19.83	
189	Replacement	Clinton	070.15230			38000					0	10	15	25	3		\$ 91.51	\$ 38.13	
190	Replacement	Jackson	070.15230			38000					0	0	10	10	3		\$ 91.51	\$ 15.25	
191	Replacement	Florence MS	070.15230			38000					0	10	15	25	2		\$ 66.51	\$ 27.71	
192	Replacement	Jackson	070.15230			38000					0	4	20	24	2		\$ 66.51	\$ 26.60	
193	Replacement	Jackson	070.15230			38000					0	2	2	4	2		\$ 66.51	\$ 4.43	
194	Replacement	Jackson	070.15230			38000					0	50	15	65	2		\$ 66.51	\$ 72.05	
195	Replacement	Jackson	070.15230			38000					0	2	5	7	2		\$ 66.51	\$ 7.76	
196	Replacement	Jackson	070.15230			38000					0	1	15	16	3		\$ 91.51	\$ 24.40	
197	Replacement	Jackson	070.15230			38000					0	2	5	7	3		\$ 91.51	\$ 10.68	
198	Replacement	Richland	070.15230			38000					0	8	8	16	2		\$ 66.51	\$ 17.73	
199	Replacement	Hinds/Raymond	070.15230			38000					30	5	30	65	4		\$ 133.01	\$ 144.10	
200	Replacement	Jackson	070.15230			38000					0	15	15	30	3		\$ 91.51	\$ 45.75	
201	Replacement	Jackson	070.15230			38000					0	30	30	60	3		\$ 91.51	\$ 91.51	
202	Replacement	Mississippi	070.15242	\$ 109,128.62	replaced 1" steel service with 1/2" plastic service	38000					-	60	30	90	1	construction operator	\$ 25.00	\$ 37.50	\$ 174.77 0.16%
203	Replacement	Mississippi	070.15242		replaced 1" steel service with 1/2" plastic service	38000					-	60	30	90	3	crew leader, (2) construction operators	\$ 91.51	\$ 137.26	
204	Replacement	Mississippi	070.15250	\$ 103,404.81	Replaced 1/2" Plastic Service	38000					-	15	30	45	2	(2) construction operators	\$ 50.01	\$ 37.50	\$ 37.50 0.04%
205	Replacement	Mississippi	070.15261	\$ 81,574.75	Replaced 1" Steel Service	38000					30	270	60	360	2	crew leader, construction operator	\$ 66.51	\$ 399.03	\$ 442.26 0.54%
206	Replacement	Mississippi	070.15261		Replaced 1" Steel Service	38000					20	-	19	39	2	crew leader, construction operator	\$ 66.51	\$ 43.23	
207	Replacement	Mississippi	070.15262	\$ 128,292.41	replace 1" steel pipe with 3/4" plastic	38000					-	15	20	35	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 77.59	\$ 2,287.95 1.78%
208	Replacement	Mississippi	070.15262		replace 1/2" plastic service line	38000					120	-	-	120	1	Construction Operator only	\$ 25.00	\$ 50.01	
209	Replacement	Mississippi	070.15262		replace 1/2" plastic with 1/2" plastic	38000					-	35	25	60	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 91.51	
210	Replacement	Mississippi	070.15262		replace 3/4" plastic service line	38000					25	-	120	145	2	Crew lead and Construction Operator	\$ 66.51	\$ 160.72	
211	Replacement	Mississippi	070.15262		replace 3/4" plastic service line	38000					30	45	-	75	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 166.26	
212	Replacement	Mississippi	070.15262		replace 3/4" plastic service line	38000					180	-	-	180	2	Crew lead and Construction Operator	\$ 66.51	\$ 199.52	
213	Replacement	Mississippi	070.15262		replaced 3/4" plastic service line	38000					-	10	30	40	2	crew leader, construction operator	\$ 66.51	\$ 44.34	
214	Replacement	Mississippi	070.15262		replaced 3/4" plastic service line	38000					-	5	-	5	2	crew leader, construction operator	\$ 66.51	\$ 5.54	
215	Replacement	Mississippi	070.15262		replaced 3/4" steel service line	38000					-	15	30	45	7	(3) crew leaders, (4) construction operators	\$ 224.52	\$ 168.39	
216	Replacement	Mississippi	070.15262		Replaced 1/2" Plastic Service	38000					15	5	40	60	2	crew leader, construction operator	\$ 66.51	\$ 66.51	
217	Replacement	Mississippi	070.15262		Replaced 3/4" Plastic Service	38000					25	5	55	85	2	crew leader, construction operator	\$ 66.51	\$ 94.22	
218	Replacement	Mississippi	070.15262		Replaced 3/4" Plastic Service	38000					45	5	70	120	2	crew leader, construction operator	\$ 66.51	\$ 133.01	
219	Replacement	Mississippi	070.15262		Replaced 1/2" Plastic Service	38000					45	5	10	60	3	crew leader, (2) construction operators	\$ 91.51	\$ 91.51	
220	Replacement	Mississippi	070.15262		Replaced 3/4" Plastic Service	38000					30	15	30	75	2	crew leader, construction operator	\$ 66.51	\$ 83.13	
221	Replacement	Mississippi	070.15262		Replaced 3/4" Plastic Service	38000					22	15	30	67	2	crew leader, construction operator	\$ 66.51	\$ 74.26	
222	Replacement	Mississippi	070.15262		Replaced 1" Steel Service	38000					30	60	60	150	2	crew leader, construction operator	\$ 66.51	\$ 166.26	
223	Replacement	Mississippi	070.15262		Replaced 2" Plastic Service	38000					30	15	90	135	2	crew leader, construction operator	\$ 66.51	\$ 149.64	
224	Replacement	Mississippi	070.15262		Replaced 1" Steel Service	38000					30	270	120	420	2	crew leader, construction operator	\$ 66.51	\$ 465.54	
227	Replacement	Mid-Tex	080.33168	\$ 577,309.95	replaced 3/4" plastic service with 3/4" plastic service	38000					-	40	5	45	2	crew leader, construction operator	\$ 66.51	\$ 49.88	\$ 301.53 0.05%
228	Replacement	Rockwall TX	080.33168			38000					85	70	10	165	3		\$ 91.51	\$ 251.65	
229	Replacement	Mid-Tex	080.33171	\$ 266,383.94	replaced 1/4 plastic pipe	38000					15	20	20	55	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 83.88	\$ 1,877.50 0.70%
230	Replacement	Mid-Tex	080.33171		replaced 3/4" plastic pipe	38000					10	25	25	60	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 91.51	
231	Replacement	Mid-Tex	080.33171		replaced 3/4" plastic pipe	38000					-	30	30	60	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 91.51	
232	Replacement	Grand Prarie TX	080.33171			38000					116	336	1	453	3		\$ 91.51	\$ 690.89	
233	Replacement	Grand Prarie TX	080.33171			38000					135	105	60	300	5		\$ 158.01	\$ 790.07	
234	Replacement	Arlington TX	080.33171			38000					15	65	5	85	3		\$ 91.51	\$ 129.64	
235	Replacement	Richardson TX	080.33345	\$ 1,289,607.14		38000					0	72	5	77	3		\$ 91.51	\$ 117.44	\$ 305.87 0.02%
236	Replacement	Plano TX	080.33345			38000					0	10	75	85	4		\$ 133.01	\$ 188.43	
237	Replacement	Mid-Tex	080.33346	\$ 1,088,173.41	replaced 1 1/4" steel service with 1/2" plastic service	38000					-	15	-	15	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 22.88	\$ 377.77 0.03%
238	Replacement	Mid-Tex	080.33346		replaced 1 1/4" steel service with 3/4" plastic service	38000					-	15	-	15	2	Crew lead and Construction Operator	\$ 66.51	\$ 16.63	
239	Replacement	Mid-Tex	080.33346		replaced 3/4" plastic pipe	38000					-	10	20	30	4	2 Crew Leads and 2 Construction Operators	\$ 133.01	\$ 66.51	
240	Replacement	Mid-Tex	080.33346		replaced 3/4" plastic service	38000					37	9	5	51	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 77.78	
241	Replacement	Mid-Tex	080.33346		replaced 3/4" steel with 3/4" plastic	38000					-	15	-	15	2	Crew lead and Construction Operator	\$ 66.51	\$ 16.63	
242	Replacement	Olney TX	080.33346			38000					90	10	30	130	2		\$ 66.51	\$ 144.10	
243	Replacement	Archer City TX	080.33346			38000					15	5	0	20	2		\$ 66.51	\$ 22.17	
244	Replacement	Archer City TX	080.33346			38000					0	10	0	10	2		\$ 66.51	\$ 11.08	
245	Replacement	Mid-Tex	080.33348	\$ 1,216,795.98	replaced 1" steel service with 3/4" plastic service	38000					30	40	5	75	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 114.39	\$ 1,301.79 0.11%



Atmos Energy Corporation  
 2014 Time & Motion Study Data Collection Summary  
 Study Results

Line No.	Classification	Jurisdiction	Project No.	Project Cost Excl Mat	Project Description	FERC Account(s)	Dollars					No. in Crew	Job Titles	Total RC	Calc RC	%		
							Added	Retired	Excavating	Isolation	Cap & Purge						Total	
246	Replacement	Mid-Tex	080.33348		replaced 1" steel service with 3/4" plastic service	38000			30	50	5	85	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 129.64		
247	Replacement	Mid-Tex	080.33348		replaced 1.25" bare steel service with 1/2" plastic service	38000			-	40	45	85	4	crew leader, sr. construction operator, (2) construction operators	\$ 133.01	\$ 188.43		
248	Replacement	Mid-Tex	080.33348		replaced 3 pre-bent risers	38000			255	-	-	255	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 388.91		
249	Replacement	Mid-Tex	080.33348		replaced 3 pre-bent risers	38000			315	-	-	315	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 480.42		
250	Replacement	Mid-Tex	080.33350	\$ 3,789,119.10	N/A	38000			180	-	-	180	3		\$ 91.51	\$ 274.53	\$ 11,611.39	0.31%
251	Replacement	Mid-Tex	080.33350		N/A	38000			180	-	-	180	3		\$ 91.51	\$ 274.53		
252	Replacement	Mid-Tex	080.33350		N/A	38000			230	60	10	300	3		\$ 91.51	\$ 457.54		
253	Replacement	Mid-Tex	080.33350		N/A	38000			140	30	10	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53		
254	Replacement	Mid-Tex	080.33350		N/A	38000			140	30	10	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53		
255	Replacement	Mid-Tex	080.33350		N/A	38000			140	30	10	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53		
256	Replacement	Mid-Tex	080.33350		N/A	38000			140	30	10	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53		
257	Replacement	Mid-Tex	080.33350		N/A	38000			140	30	10	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53		
258	Replacement	Mid-Tex	080.33350		N/A	38000			140	30	10	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53		
259	Replacement	Mid-Tex	080.33350		N/A	38000			140	30	10	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53		
260	Replacement	Mid-Tex	080.33350		N/A	38000			140	30	10	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53		
261	Replacement	Mid-Tex	080.33350		N/A	38000			140	30	10	180	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 274.53		
262	Replacement	Mid-Tex	080.33350		N/A	38000			630	-	-	630	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 960.84		
263	Replacement	Mid-Tex	080.33350		N/A	38000			105	30	15	150	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 228.77		
264	Replacement	Mid-Tex	080.33350		N/A	38000			480	60	15	555	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 846.45		
265	Replacement	Mid-Tex	080.33350		N/A	38000			120	30	15	165	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 251.65		
266	Replacement	Mid-Tex	080.33350		N/A	38000			120	30	15	165	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 251.65		
267	Replacement	Mid-Tex	080.33350		N/A	38000			120	30	15	165	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 251.65		
268	Replacement	Mid-Tex	080.33350		N/A	38000			120	30	15	165	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 251.65		
269	Replacement	Mid-Tex	080.33350		N/A	38000			120	30	15	165	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 251.65		
270	Replacement	Mid-Tex	080.33350		replaced 1" steel s/l	38000			73	156	3	232	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 353.83		
271	Replacement	Mid-Tex	080.33350		replaced 2" steel pipe	38000			105	60	30	195	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 297.40		
272	Replacement	Mid-Tex	080.33350		replaced 3/4" steel pipe with 3/4" plastic	38000			210	60	30	300	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 457.54		
273	Replacement	Mansfield TX	080.33350			38000			95	20	60	175	3		\$ 91.51	\$ 266.90		
274	Replacement	Arlington TX	080.33350			38000			90	46	1	137	3		\$ 91.51	\$ 208.94		
275	Replacement	Grand Prairie TX	080.33350			38000			84	29	20	133	4		\$ 133.01	\$ 294.84		
276	Replacement	Irving TX	080.33350			38000			240	120	120	480	3		\$ 91.51	\$ 732.07		
277	Replacement	Arlington TX	080.33350			38000			25	65	15	105	6		\$ 183.02	\$ 320.28		
278	Replacement	Irving TX	080.33350			38000			210	60	30	300	3		\$ 91.51	\$ 457.54		
279	Replacement	Irving TX	080.33350			38000			150	60	30	240	3		\$ 91.51	\$ 366.03		
280	Replacement	Grand Prairie TX	080.33350			38000			98	161	2	261	3		\$ 91.51	\$ 398.06		
281	Replacement	Arlington TX	080.33350			38000			90	25	25	140	3		\$ 91.51	\$ 213.52		
282	Replacement	Irving TX	080.33350			38000			180	30	60	270	3		\$ 91.51	\$ 411.79		
283	Replacement	Grand Prairie TX	080.33350			38000			20	15	5	40	3		\$ 91.51	\$ 61.01		
284	Replacement	Mid-Tex	080.33352	\$ 1,477,898.09	replaced 1 1/4" bare steel service with 3/4" PE service	38000			-	50	-	50	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 76.26	\$ 213.48	0.01%
285	Replacement	Mid-Tex	080.33352		replaced 1" bare steel service with 1/2" plastic service	38000			-	55	-	55	2	Crew lead and Construction Operator	\$ 66.51	\$ 60.96		
286	Replacement	Mid-Tex	080.33352			38000			-	10	20	30	3	crew leader, (2) construction operators	\$ 91.51	\$ 45.75		
287	Replacement	Mid-Tex	080.33352			38000			-	10	10	20	3	crew leader, (2) construction operators	\$ 91.51	\$ 30.50		
288	Replacement	Mid-Tex	080.43736	\$ 45,234.71 \$ 15,868,462.89	N/A	38000			630	-	-	630	3	Crew lead and 2 Construction Operators	\$ 91.51	\$ 960.84	\$ 960.84	2.12%
															\$ 40,873.61	\$ 0.26%		

Appendix C  
2011 WTX Sample Results



Atmos Energy, West Texas Division  
Summary of COR Study  
Feb-2011 Through August-2011

	<u>COR</u>	<u>Total Labor</u>	
Mains	5,645.12	168,881.55	3.34%
Services	4,839.43	70,158.74	6.90%
Both	28,167.36	351,379.10	8.02%
Total	38,651.90	590,419.39	6.55%

# Atmos Energy Measuring and Regulating Time and Motion Study



# Atmos Energy Measuring and Regulating Time and Motion Study Table of Contents

Introduction..... 3  
Study Methodology ..... 4  
Study Results..... 5  
Detailed Discussion ..... 6  
    Detailed Process Description ..... 6  
    Measurement ..... 7  
    Regulation ..... 10  
Appendix A ..... 14  
Appendix B ..... 16

## Introduction

Atmos Energy asked Alliance Consulting Group in 2016 to conduct a study to determine the allocation of labor costs to removal activities for replacing Measuring and Regulating assets. These allocation factors would be used to charge a portion of the overall labor cost to removal cost for various capital replacement-related activities. Prior to this study, costs of activities solely related to the removal of old assets in replacement projects were generally estimated on a project by project basis and charged to a Removal Task associated with each project. The estimation of the removal effort varied based on, among other things, the type of project and the assumptions made by the estimator. The results of this study will provide a framework to consistently and accurately allocate the appropriate charges to both construction and removal cost.

## Study Methodology

This study focused on assets related to measurement and regulation of gas as it is moved through distribution mains to the end user. The work flows related to the replacement of measurement assets and regulation assets are different and are addressed separately in this report. The methodology consistently used in this study is a conservative approach of only categorizing the cost of incremental activities that were specifically driven by the retirement of the old asset in replacement projects as removal activities.

Under the incremental approach, the common costs for replacement projects are allocated solely to the installation of the construction project. The rationale for this approach is compelling. When the first asset is constructed, the total cost of activities (including costs which would later be common activities in replacement projects such as mobilization and bringing the site back to its original condition) would be charged to the installation of the asset. To consistently apply the same costs to the replacement asset on the same basis as the original asset, these common activities should be charged to the installation of the new asset. Only those activities that would not have been necessary in the first installation would be charged as removal costs. This methodology is consistent with that used in the Mains and Services removal cost study.

# Study Results

The following table shows the recommended removal cost percentages for use in allocating labor for replacement projects to removal cost. No material is allocated to removal.

Project Type	Current Removal Cost Percentage	Proposed Removal Cost Percentage
Meters, house regulators and meter loops	Various	5.00%
Regulator Stations (District and City Gate)	Various	5.00%

Projects where the scope is solely the removal of assets would still allocate 100% of labor costs to removal cost

Project Type	Current Removal Cost Percentage	Proposed Removal Cost Percentage
Meters, House Regulators and Meter Loop Removal Only	100%	100%
Regulator Stations (District and City Gate) Removal Only	100%	100%

## Detailed Discussion

### Detailed Process Description

The process to determine the incremental removal costs of projects included three steps: 1. determining the incremental removal cost activities, 2. Interviewing subject matter experts to determine the expected time for each activity, 3. conducting a time study, when appropriate (conducted for meter related assets but not appropriate for regulation assets), to determine the time and cost of the incremental removal activities and 4. analyzing the results and recommending new removal cost allocations to apply to labor costs within the PowerPlan system.

Determining the incremental removal cost activities began with detailed interviews with Atmos Operations personnel to determine the incremental activities associated with replacing measurement and regulation assets. These removal steps are addressed in the individual sections of this report.

In the following sections, the specific process and results for each of the categories are discussed.

## Measurement

Measurement assets encompass the meter, regulator and meter loop. There are two different sets of process depending on whether just the meter is replaced or the meter and regulator/loop are replaced. The first process is when only the meter is replaced. There is significant overlap between the meter-only replacement process and the process used when the regulator/meter loop are also replaced. Note that 100% of meter replacements are made by Company personnel. The designation of “C” and “R” denote whether the activity is related to the construction (“C”) of the replacement asset or the removal (“R”) of the existing asset.

### Process when meter is replaced but not regulator

- Verify that meter needs replacing (malfunction or age of meter, etc.) – R
- Turn gas off (verify if customer is home) – R
- Check out regulator after gas is off to see if it needs replacing (This is a regulator activity) - R
- If regulator is good, will just replace the meter - R
- Loosen swivels, - R
- Connect inlet side of meter to riser - C
- Run pressure test on customer line, - C
- If customer line is losing pressure, isolate each appliance until leak is found), - C
- Test new meter being installed – C



- Connect outlet side of meter to customer line, - C
- Turn gas on, - C
- Relight appliances (would not general light on new services) – R

#### Process where meter and regulator need replacing

- Turn gas off (verify if customer is home) – R
- Verify the regulator needs replacing (leak, malfunction or age, etc.) –R
- Generally, will have removed the meter before testing the regulator – see Meter process - R
- Break meter loop down to stop, - R
- remove old regulator, - R
- rebuild loop with new regulator, - C
- test loop, regulator, meter and customer side – C
- Turn gas on – C
- Relight appliances – R

This analysis used a two-part approach to determining the amount of effort required for the removal activities. Information from the Company's automated time tracking system, called ClickSchedule, was used to determine the time required for removal-only projects and compared to the total time required for replacement projects. The percentage of the time required for removal-only projects are separately tracked in ClickSchedule. Below is a description of the ClickSchedule application.

ClickSchedule is an enterprise application used to provide better and more efficient scheduling of service personnel and other field resources. ClickSchedule can be integrated with any Enterprise Resource Planning (ERP) System, or other legacy systems that may be in use for the creation and management of tasks, orders, jobs, projects, or any other type of work.

Designed for organizations that provide various types of service, ClickSchedule ensures that appropriately skilled and available resources are selected to complete a task or series of tasks. Selecting the best resource can maximize resource utilization, minimize time to respond or complete work, and minimize cost of service.

ClickSchedule utilizes built-in scheduling criteria to automate much of the scheduling process. Parameters such as resource details, task data, and scheduling policies are configured, while other unique scheduling criteria can be added as needed. The system schedules tasks according to predefined service policies and ensures that dispatchers make scheduling decisions that comply with Atmos Energy policies.

ClickSchedule tracks the following types of projects related to meter activity. The DEMOPUL and MTRPULL categories are removal-only project types while the rest relate to replacement activities.

DEMOPUL	Meter work - Pull Meter due to demolition
MTRPACH	Meter Work - Appointable Periodic Change
MTRPULL	Meter work - Pull Meter
MTRPXCH	Meter Work - Periodic Change
MTRSIZE	Meter Work - Meter Size Change
MTRXCHG	Meter Work - Meter Change

Using the data from the ClickSchedule database, the actual time required for removal-only activities across the Atmos system could be found and averaged. This average was then compared to the time required for full replacement projects to determine the percentage of total labor that is required for the removal activities. In addition, to supplement the results of the time tracking application, the field was asked to manually capture the time spend during projects on removal activities. A data input form was created and field personnel reported their time spent in performing removal activities. The data input sheet is found in Appendix B. This information was added to the results from the ClickSchedule analysis. A summary of the results of the ClickSchedule data and the manual time tracking data is found in Appendix A.

## Regulation

Regulation assets encompass District Regulator Stations and City Gates.

The activities related to removing District Regulator Stations (“DRS”) and City Gates is different from that of removing meters and meter loops. Due to the wide variety of situations and configurations of DRS and City Gates and the infrequency of removal, a time tracking approach was not applicable. Most of the time, DRS will be replaced stand alone and DRS will generally just be retired if it is a low pressure DRS. Determining the labor allocation for removal activities for DRS and City Gates relies on detailed discussions with Company Subject Matter Experts (“SME”). Below are the process steps to replace a DRS or City Gate. The designation of “C” and “R” denote whether the activity is related to the construction (“C”) of the replacement asset or the removal (“R”) of the existing asset.

To retire a station, it is basically the same process as retiring and replacing a main.

- Take down the fence if necessary – C
- Dig up inlet and outlet – C
- Isolate valves as appropriate – C
- If no valves, weld on new valves as appropriate – C
- Run a temporary bypass as needed - R
- Stop the gas on both ends - R
- Cut the pipe on both end and pull out the equipment - R

- If prefab (as most are), weld on inlet and outlet risers – C
- Either weld or bolt the DRS onto the risers (the bigger the station, the more complicated it is) – C
- When put together, will crack the stoppers and purge the air out of the equipment - C

A 2 inch station replacement could be completed in a day – a 12 inch station may take 2-3 weeks to complete. On the larger stations, crews would generally construct the new station in parallel to the old when possible.

On a 2 inch station, it would only take perhaps ½ hour to remove the old equipment. Stopping gas, blowing down, cutting the pipe and removing the station does not require the care and plumbing /aligning properly the pipe. 30 minutes out of an 8 hour day is slightly over 5% (6.25%). 30 minutes may be longer than would be required in many cases.

The only difference between replacing the DRS and the pipe is that the pipe is generally left in place while the DRS will have to be hauled off and disposed. However, the cost of the project is higher for a DRS due to the cost of the equipment other than the pipe.

Based on the above input from Company SMEs, a 5 percent allocation for removal cost is recommended. This appropriately will parallel the percentage used for the removal of Mains and Services

since the activities related to the replacement of stations is roughly the same as that of replacing other categories of pipe.

## Appendix A Meter Results

**Atmos Energy Corporation**  
Meter Time and Motion Study Summary  
January 1, 2016 through August 31, 2016  
Total Project Times by Job Code

Line No.	Job Code	Texas	KMD	COKS	Louisiana	Mississippi	Total
1	<b>Retirement Activity:</b>						
2	DEMOPUL	6,052	1,037	305	1,301	467	9,162
3	MTRPULL	32,720	22,692	7,404	16,939	3,694	83,449
4	Data Collection Sheets	-	340	166	168	396	1,070
5	Total Retirement (mins)	<u>38,772</u>	<u>24,069</u>	<u>7,875</u>	<u>18,408</u>	<u>4,557</u>	<u>93,681</u>
6							
7	<b>Replacement Activity:</b>						
8	MTRPACH	152,853	101,178	129,254	39,528	230,085	652,898
9	MTRPXCH	411,457	69,514	101,384	67,104	140,519	789,978
10	MTRSIZE	96,598	23,765	4,459	25,623	5,560	156,005
11	MTRXCHG	136,739	18,544	28,204	19,858	26,274	229,619
12	Data Collection Sheets	-	2,479	1,766	1,277	4,635	10,157
13	Total Replacement (mins)	<u>797,647</u>	<u>215,480</u>	<u>265,067</u>	<u>153,390</u>	<u>407,073</u>	<u>1,838,657</u>
14							
15	<b>Percentage</b>	<b>4.86%</b>	<b>11.17%</b>	<b>2.97%</b>	<b>12.00%</b>	<b>1.12%</b>	<b>5.10%</b>
16							
17	Note: The total project times in the summary above are in minutes.						
18							
19	<u>Job Code</u>	<u>Description</u>					
20	DEMOPUL	Meter Pull due to demolition.					
21	MTRPULL	Meter Pull.					
22	MTRPACH	Appointable Periodic Change.					
23	MTRPXCH	Periodic Change					
24	MTRXCHG	Meter Change					
25	MTRSIZE	Meter Size Change.					



Appendix B  
Meter Sampling Form



## Meter Loop Replacement - Cost of Removal Time and Motion Study

Technician Name \_\_\_\_\_

Supervisor \_\_\_\_\_

**General Instructions:**

- Complete this form for ten (10) Non-Growth meter change exchanges.
- Use a watch to record the time necessary to conduct the activities below. Precise times are crucial to this study, **DO NOT ESTIMATE TIMING!!!**
- Supervisor: Return Completed Forms to John Johnson via email at [john.johnson@atmosenergy.com](mailto:john.johnson@atmosenergy.com), for questions call (214) 303-9135.

Cost Center \_\_\_\_\_

	Service Order#	Address	Date Work Performed	Meter Removed	Activity	No. of Minutes
x	10000-6577718	1234 Anywhere Street	03/07/2016		Travel Time to Project Site	12
		Lubbock, TX 79424		American-175	Removal of Old Meter	2
					All Other Activities	46
					<b>Total Project Time</b>	60
1					Travel Time to Project Site	
					Removal of Old Meter	
					All Other Activities	
					<b>Total Project Time</b>	
2					Travel Time to Project Site	
					Removal of Old Meter	
					All Other Activities	
					<b>Total Project Time</b>	
3					Travel Time to Project Site	
					Removal of Old Meter	
					All Other Activities	
					<b>Total Project Time</b>	
4					Travel Time to Project Site	
					Removal of Old Meter	
					All Other Activities	
					<b>Total Project Time</b>	
5					Travel Time to Project Site	
					Removal of Old Meter	
					All Other Activities	
					<b>Total Project Time</b>	
6					Travel Time to Project Site	
					Removal of Old Meter	
					All Other Activities	
					<b>Total Project Time</b>	
7					Travel Time to Project Site	
					Removal of Old Meter	
					All Other Activities	
					<b>Total Project Time</b>	
8					Travel Time to Project Site	
					Removal of Old Meter	
					All Other Activities	
					<b>Total Project Time</b>	
9					Travel Time to Project Site	
					Removal of Old Meter	
					All Other Activities	
					<b>Total Project Time</b>	
10					Travel Time to Project Site	
					Removal of Old Meter	
					All Other Activities	
					<b>Total Project Time</b>	

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-45**  
**Page 1 of 1**

**REQUEST:**

Provide a detailed description of the Company's accounting when it retires assets and replaces them with new assets, including the methodology it uses to allocate or otherwise determine the payroll and related costs allocated to the additions versus the retirements for cost of removal.

**RESPONSE:**

Please see the Company's response to AG DR No. 1-44.

Respondent: Michelle Faulk

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-46**  
**Page 1 of 1**

**REQUEST:**

Provide a detailed description of the Company's guidelines and practices for the physical removal of assets by type of plant (pipeline, regulator, service, etc.) or whether they are left in place. For example, most utilities do not remove old pipeline when it is retired, at least longer sections, instead cutting and bypassing the old pipeline when a section is replaced.

**RESPONSE:**

Atmos Energy is similar to other utilities in that we do not remove the old pipeline when retired in most but not all circumstances. We do indeed cut and bypass the old pipeline when a section is replaced.

Respondent: Ryan Austin

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-47**  
**Page 1 of 1**

**REQUEST:**

Refer to the Direct Testimony of Dane Watson at 11 wherein he states: "Atmos has performed and implemented a Time and Motion Study for net salvage, which was reflected in the last study and remains in effect now."

- a. Provide a copy of this study.
- b. Describe specifically how the results of this study are reflected in the Atmos accounting for net salvage.
- c. Describe specifically how the results of this study were considered and reflected in the depreciation study.

**RESPONSE:**

- a. Please see Attachment 1 and Attachment 2 to the Company's response to AG DR No. 1-44.
- b. Please see the Company's response to AG DR No. 1-44. The results of these studies were applied to all of Atmos Energy's regulated entities after completion, including Kentucky. The time and motion studies results were used to allocate cost of removal to the accumulated provision for depreciation (Account 108) for certain replacement projects.
- c. As described in the depreciation study report, in conducting the net salvage analysis, Mr. Watson looked at the Company's historical activity in rolling and shrinking bands. Activity from 1996-2020 was analyzed and evaluated for the accounts. More weight was given to the 3 and 5 year bands since those would show the effect of the time and motion studies. It is the combination of the analysis, trends and input from Company subject matter experts, as well as the use of gradualism and professional judgment that resulted in the proposed net salvage parameters contained in the depreciation study. For the detailed discussion on net salvage, by account, please refer to Exhibit DAW-2 provided in the Direct Testimony of Dane Watson.

Respondents: Michelle Faulk and Dane Watson

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-48**  
**Page 1 of 1**

**REQUEST:**

Confirm that actual net salvage is recorded directly to accumulated depreciation. If denied, then provide a corrected statement and an explanation as to why a correction was necessary. In addition, provide all authoritative support for the corrected statement. If confirmed, then provide the accounts used to record positive net salvage and the accounts used to record negative net salvage. Provide an example of each to illustrate the accounting.

**RESPONSE:**

Confirm. Net Salvage is the result of gross salvage minus cost of removal. When a retirement is recorded, any gross salvage or cost of removal incurred is recorded to Account 108 whether it results in positive or negative net salvage.

Respondent: Michelle Faulk

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-49**  
**Page 1 of 1**

**REQUEST:**

Confirm that in the Company's depreciation study, the actual net salvage incurred through the date of the depreciation study is reflected in the accumulated depreciation reserves and the amount to be recovered is gross plant in service less accumulated depreciation reserves less net salvage, the result of which is divided by the average remaining service life for each account to calculate the required depreciation expense. If denied, then provide a corrected statement and an explanation as to why a correction was necessary.

**RESPONSE:**

Confirmed.

Respondent: Dane Watson

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-50**  
**Page 1 of 1**

**REQUEST:**

Confirm that the Company separately records the accumulated net salvage as a regulatory liability for financial reporting purposes. If confirmed, then provide a detailed explanation how the Company records this component of the accumulated depreciation reserve, how it is increased through the depreciation expense, and how it is reduced or increased by the actual net salvage recorded. Provide the accounts used for this purpose in the Company's accounting records and provide an example that illustrates the Company's accounting for this purpose.

**RESPONSE:**

The Company reclassifies the accumulated net salvage (gross salvage less cost of removal) out of accumulated depreciation into a regulatory liability for financial reporting purposes, as shown in our Form 10-K.

Please see the Company's response to AG DR No. 1-44 for the accounts used for recording accumulated depreciation.

Respondent: Michelle Faulk



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-51**  
**Page 1 of 1**

**REQUEST:**

Confirm that the depreciation study does not true-up the Company's actual net salvage to its forecast net salvage, except indirectly through the accumulated depreciation reserve used to calculate the required depreciation expense.

**RESPONSE:**

The Company cannot confirm nor deny. The meaning of the term, "true-up" in the question is unclear. The requested depreciation rates (used to calculate the depreciation expense) are derived from a straight-line, average life group, remaining life depreciation system. This system recovers the undepreciated investment (including estimated net salvage) over the remaining life of the group. As demonstrated in the study, the recommended negative net salvage rates are generally less negative than the actual removal cost percentage experienced by the Company in recent years due to the use of gradualism in the recommendations.

Respondent: Dane Watson

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-52**  
**Page 1 of 2**

**REQUEST:**

Refer to Schedule J-3F line 16 in this proceeding, which reflects an amortization of debt expense and discount of \$10,293,599. Also refer to line 12 in Schedule J-3F filed in Case No. 2018-00281, which reflects an amortization of debt expense and discount of \$6,580,966. Explain all reasons why the amortization is projected to increase by \$3,712,633, or more than 56%, between the two forecast periods. As part of the answer, provide a reconciliation of the annual amortization and unamortized amounts of debt discount and debt expenses by debt issue between the two periods.

**RESPONSE:**

The \$3,712,633 increase in amortization between the two forecast periods was primarily due to the following long term debt issuances:

- On October 4, 2018, we completed a public offering of \$600 million of 4.30% senior notes due 2048. We received net proceeds from the offering, after the underwriting discount and offering expenses, of \$590.6 million, that were used to repay working capital borrowings pursuant to our commercial paper program. The effective interest rate of these notes is 4.37% after giving effect to the offering costs.
- On March 4, 2019, we completed a public offering of \$450 million of 4.125% senior notes due 2049. The effective interest rate of these notes is 4.86%, after giving effect to the offering costs and the settlement of the associated forward starting interest rate swaps. The net proceeds, after the underwriting discount and offering expenses, of \$443.4 million, together with available cash, was used to repay at maturity our \$450 million 8.50% unsecured senior notes due March 15, 2019 and the related settlement of our interest rate swaps for \$90.1 million.
- On October 2, 2019, we completed a public offering of \$300 million of 2.625% senior notes due 2029 and \$500 million of 3.375% senior notes due 2049. We received net proceeds from the offering, after the underwriting discount and offering expenses, of \$791.7 million, that were used for general corporate purposes, including the repayment of borrowings pursuant to our commercial paper program. The effective interest rate on these notes is 2.72% and 3.42%, after giving effect to the offering costs.
- On April 9, 2020, we entered into a two year, \$200 million term loan agreement. Borrowings under the term loan may be repaid on or after April 9, 2021 and will bear interest at a rate of LIBOR plus 1.25 percent. The term loan was used to pay down all of our outstanding commercial paper.
- On October 1, 2020, we completed a public offering of \$600 million of 1.50% senior notes due 2031, with an effective interest rate of 1.71%, after giving effect to the offering costs and settlement of our interest rate swaps. The net proceeds from the offering, after the underwriting discount and offering expenses, of \$592.3 million, were used for general corporate purposes, including the repayment of working capital borrowings pursuant to our commercial paper program and the related settlement of our interest rate swaps.

Please see Attachment 1 for more detail.

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-52**  
**Page 2 of 2**

ATTACHMENT:

ATTACHMENT 1 - AG\_1-52\_Att1 - LTD Issuances Support, 4 Pages.

Respondent: Joe Christian

**Atmos Energy Corporation**  
**Case No. 2021-00214**  
**Data Request 52**

**Atmos Energy Corporation**  
**Consolidated Long-Term Debt Outstanding w/ calculation of Effective Interest Rates**  
**June 30, 2018**

<u>Line</u>	<u>Debt Series</u>	<u>Issued</u>	Annualized	Annualized
			4270 Amort	4280, 4281, 4290 & 4310
	(a)	(b)	for T-lock/Swaps	Amortization
			(u)	Debt Exp, Dsct & Prem
				(v)
1	9.40% First Mortgage Bond J due May 2021/RET 2005	04/01/91	0	560,397
2	6.75% Debentures Unsecured due July 2028	07/27/98	0	99,938
3	5.125% Senior Note due Jan 2013	01/13/03	0	0
4	10.43% First Mortgage Bond P due 2017 (eff 2012)	11/01/87	0	0
5	9.75% First Mortgage Bond Q due Apr 2020/RET 2005	04/01/90	0	337,581
6	9.32% First Mortgage Bond T due June 2021/RET 2005	06/01/91	0	362,746
7	8.77% First Mortgage Bond U due May 2022/RET 2005	05/01/92	0	368,719
8	6.67% MTN A1 due Dec 2025	12/15/95	0	7,777
9	4.95% Sr Note due 10/15/2014	10/22/04	0	0
10	5.95% Sr Note due 10/15/2034	10/22/04	(7,047)	115,724
11	6.35% Sr Note due 6/15/2017	06/2007	0	0
12	Sr Note 5.50% Due 06/15/2041	6/10/2011	(669,302)	186,860
13	8.50% Sr Note due 3/15/2019	03/23/09	(77,734)	1,161,169
14	4.15% Sr Note due 1/15/2043	01/15/13	2,220,857	378,080
15	4.125% Sr Note due 10/15/2044 (500MM(2014) & 250MM(2017))	10/15/2014	908,016	(43,555)
16	3% Sr Note due 6/15/2027	06/2017	0	555,072
17	March 2019 - Swap Position	03/2019	0	0
18	\$200MM 3YR. Sr Credit Facility (Established 9/22/16)		0	115,667
19	Subtotal -- Utility Long-Term Debt		\$ 2,374,790	\$ 4,206,175
<b>Total</b>			<b>\$</b>	<b>6,580,966</b>

**Atmos Energy Corporation**  
**Consolidated Long-Term Debt Outstanding w/ calculation of Effective Interest Rates**  
**March 31, 2021**

<u>Line</u>	<u>Debt Series</u> (a)	<u>Issued</u> (b)	Annualized	Annualized
			4270 Amort for T-lock/Swaps (w)	4280, 4281, 4290 & 4310 Amortization Debt Exp, Dsct & Prem (x)
1	9.40% First Mortgage Bond J due May 2021/RET 2005	04/01/91	-	560,397
2	6.75% Debentures Unsecured due July 2028	07/27/98	-	99,938
3	5.125% Senior Note due Jan 2013	01/13/03	-	-
4	10.43% First Mortgage Bond P due 2017 (eff 2012)	11/01/87	-	-
5	9.75% First Mortgage Bond Q due Apr 2020/RET 2005	04/01/90	-	-
6	9.32% First Mortgage Bond T due June 2021/RET 2005	06/01/91	-	362,746
7	8.77% First Mortgage Bond U due May 2022/RET 2005	05/01/92	-	368,719
8	6.67% MTN A1 due Dec 2025	12/15/95	-	7,777
9	4.95% Sr Note due 10/15/2014	10/22/04	-	-
10	5.95% Sr Note due 10/15/2034	10/22/04	(7,047)	115,724
11	4.3% Sr Note due 10/1/2048	10/2018	-	315,361
12	Sr Note 5.50% Due 06/15/2041	6/10/2011	(669,302)	186,860
13	8.50% Sr Note due 3/15/2019	03/23/09	-	-
14	4.15% Sr Note due 1/15/2043	01/15/13	2,220,857	378,080
15	4.125% Sr Note due 10/15/2044 (500MM(2014) & 250MM(2017))	10/15/14	908,016	(43,555)
16	3.00% Sr Note due 6/15/2027	06/2017	-	555,072
17	4.125% Sr Note due 3/15/49	03/2019	3,004,713	220,238
18	2.625% Sr Notes Due 2029	10/2019	-	266,667
19	3.375% Sr Notes Due 2049	10/2019	-	187,982
20	\$200MM 3YR. Term Loan (Established 4/09/20)	04/2020	-	82,500
21	1.500% Sr Notes Due 2031	10/01/20	428,328	743,529
22	Subtotal -- Utility Long-Term Debt		\$ 5,885,565	\$ 4,408,034
<b>Total</b>			<b>\$</b>	<b>10,293,599</b>

**Atmos Energy Corporation**  
**Consolidated Long-Term Debt Outstanding w/ calculation of Effective Interest Rates**  
**Reconciliation June 20, 2018 to March 31, 2021**

<u>Line</u>	<u>Debt Series</u> (a)	<u>Issued</u> (b)	Annualized	Annualized	<u>Explanation</u>
			4270 Amort for T-lock/Swaps (w)	4280, 4281, 4290 & 4310 Amortization Debt Exp, Dsct & Prem (x)	
1	9.40% First Mortgage Bond J due May 2021/RET 2005	04/01/91	-	-	
2	6.75% Debentures Unsecured due July 2028	07/27/98	-	0	
3	5.125% Senior Note due Jan 2013	01/13/03	-	-	
4	10.43% First Mortgage Bond P due 2017 (eff 2012)	11/01/87	-	-	
5	9.75% First Mortgage Bond Q due Apr 2020/RET 2005	04/01/90	-	(337,581)	Fully amortized
6	9.32% First Mortgage Bond T due June 2021/RET 2005	06/01/91	-	0	
7	8.77% First Mortgage Bond U due May 2022/RET 2005	05/01/92	-	0	
8	6.67% MTN A1 due Dec 2025	12/15/95	-	-	
9	4.95% Sr Note due 10/15/2014	10/22/04	-	-	
10	5.95% Sr Note due 10/15/2034	10/22/04	-	(0)	
11	4.3% Sr Note due 10/1/2048	10/2018	-	315,361	New debt issued October 2018 (1)
			-	-	
12	Sr Note 5.50% Due 06/15/2041	6/10/2011	-	-	
13	8.50% Sr Note due 3/15/2019	03/23/09	77,734	(1,161,169)	Fully amortized
14	4.15% Sr Note due 1/15/2043	01/15/13	-	0	
15	4.125% Sr Note due 10/15/2044 (500MM(2014) & 250MM(2017))	10/15/14	-	-	
16	3.00% Sr Note due 6/15/2027	06/2017	-	0	
17	4.125% Sr Note due 3/15/49	03/2019	3,004,713	220,238	New debt issued March 2019 with settled swaps (2)
18	2.625% Sr Notes Due 2029	10/2019	-	266,667	New debt issued October 2019 (3)
19	3.375% Sr Notes Due 2049	10/2019	-	187,982	New debt issued October 2019 (3)
20	\$200MM 3YR. Term Loan (Established 4/09/20)	04/2020	-	(33,167)	New Term Loan Established 2020 (4)
21	1.500% Sr Notes Due 2031	10/01/20	428,328	743,529	New debt issued October 2020 with settled swaps (5)
22	Subtotal -- Utility Long-Term Debt		\$ 3,510,775	\$ 201,859	
<b>Total</b>			<b>\$ 3,712,634</b>		

Reference

(1) 10Q 3.31.19      On October 4, 2018, we completed a public offering of \$600 million of 4.30% senior notes due 2048. We received net proceeds from the offering, after the underwriting discount and offering expenses, of \$590.6 million, that were used to repay working capital borrowings pursuant to our commercial paper program. The effective interest rate of these notes is 4.37% after giving effect to the offering costs.

(2) 10Q 3.31.19      ↓ In fiscal 2014 and 2015, we entered into forward starting interest rate swaps to fix the Treasury yield component associated with \$450 million of the then anticipated issuance of \$450 million unsecured senior notes in fiscal 2019. These notes were issued as planned in March 2019 and we settled the swaps with the payment of \$90.1 million. Because the swaps were effective, the realized loss was recorded as a component of AOCI and is being recognized as a component of interest expense over the 30-year life of the senior notes.

(3) 10Q 3.31.20      On October 2, 2019, we completed a public offering of \$300 million of 2.625% senior notes due 2029 and \$500 million of 3.375% senior notes due 2049. We received net proceeds from the offering, after the underwriting discount and offering expenses, of \$791.7 million, that were used for general corporate purposes, including the repayment of borrowings pursuant to our commercial paper program. The effective interest rate on these notes is 2.72% and 3.42%, after giving effect to the offering costs.

(4) 10Q 3.31.20      On April 9, 2020, we entered into a two year, \$200 million term loan agreement. Borrowings under the term loan may be repaid on or after April 9, 2021 and will bear interest at a rate of LIBOR plus 1.25 percent. The term loan was used to pay down all of our outstanding commercial paper.

(5) 10Q 3.31.21      ↑ On October 1, 2020, we completed a public offering of \$600 million of 1.50% senior notes due 2031, with an effective interest rate of 1.71%, after giving effect to the offering costs and settlement of our interest rate swaps. The net proceeds from the offering, after the underwriting discount and offering expenses, of \$592.3 million, were used for general corporate purposes, including the repayment of working capital borrowings pursuant to our commercial paper program and the related settlement of our interest rate swaps.

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-53**  
**Page 1 of 2**

**REQUEST:**

Refer to Schedule J-3F line 14 in this proceeding which reflects a 13 month average outstanding debt of \$5.160 billion. Also refer to line 10 in Schedule J-3F filed in Case No. 2018-00281, which reflects a 13 month average outstanding debt of \$3.148 billion. Finally, refer to the Direct Testimony of Mr. Christian at 54 that discusses the \$2.2 billion of financing issued in March of 2021 (“March 21 Financing”) to finance the natural gas expense related to Winter Storm Uri and the Company’s adjustment to remove this financing from the outstanding debt reflected in this proceeding.

- a. Confirm that the increase in debt between the periods of \$2.012 billion is not related to the March 21 Financing of the excessive natural gas expense related to Winter Storm Uri. If not confirmed, explain.
- b. Confirm that there was no unamortized debt expense and debt discount and amortization of such included in the instant case projected debt costs related to the March 21 Financing. If not confirmed, explain.
- c. Provide the issuance dates for all issues portrayed on Schedule J-3F in this proceeding.

**RESPONSE:**

- a. Confirm. The increase in long-term debt shown on J-3 F, line 14 is a result of capital investment in our distribution and transmission operations since the end of the previous case. Despite the growth in long-term debt the Company, as discussed in the Direct Testimony of Mr. Christian in Case No. 2018-00281, page 8, has maintained an overall debt-to-equity ratio in line with the June 30, 2018 ratio.
- b. Confirm. The unamortized debt expense and debt discount and amortization only relate to the long-term debt that is included in this case.



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-53**  
**Page 2 of 2**

C.

Description	Coupon Rate (%)	Amount Outstanding (\$000)	Issue Date	Maturity Date
6.75% Debentures Unsecured due July 2028	6.7500	150,000	7/27/1998	7/15/2028
6.67% MTN A1 due Dec 2025	6.6700	10,000	12/15/1995	12/15/2025
5.95% Sr Note due 10/15/2034	5.9500	200,000	10/22/2004	10/15/2034
4.3% Sr Note due 10/1/2048	4.3000	600,000	10/4/2018	10/1/2048
Sr Note 5.50% Due 06/15/2041	5.5000	400,000	6/10/2011	6/15/2041
4.15% Sr Note due 1/15/2043	4.1500	500,000	1/11/2013	1/15/2043
4.125% Sr Note due 10/15/2044 (500MM(2014) & 250MM(2017))	4.1250	750,000	10/15/2014	10/15/2044
3.00% Sr Note due 6/15/2027	3.0000	500,000	6/8/2017	6/15/2027
4.125% Sr Note due 3/15/49	4.1250	450,000	3/4/2019	3/15/2049
2.625% Sr Notes Due 2029	2.6250	300,000	10/2/2019	9/15/2029
3.375% Sr Notes Due 2049	3.3750	500,000	10/2/2019	9/15/2049
\$200MM 3YR. Term Loan (Established 4/09/20)	Variable	200,000	4/9/2020	4/9/2022
1.500% Sr Notes Due 2031	1.5000	600,000	10/1/2020	1/15/2031

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-54**  
**Page 1 of 1**

**REQUEST:**

Refer to FR1698)(k) which provides among other things the components of the capital structure for Atmos Energy Corporation for the prior calendar years from 2011 to 2020, the base year, and the test year. Identify and describe all reasons why the Company significantly reduced the level of short term debt starting in 2020 and for the base and test years compared to all years from 2011 through 2019.

**RESPONSE:**

The Company currently anticipates incremental long-term financing of \$6.5 billion - \$7.5 billion through fiscal 2025. This incremental financing will be accomplished through the issuance of debt and equity securities to maintain a balanced capital structure with an equity-to-capitalization ratio in a target range of 50 to 60 percent, inclusive of short-term debt. Short-term debt will be utilized to provide cost-effective financing until it can be replaced with a mix of long-term debt and equity financing. This incremental financing will be supported by a \$5 billion shelf registration statement filed in June of 2021. The financing is expected to support our current credit metrics.

As discussed in Case No. 2018-00281 (see the response to AG DR No. 1-16 as well as Direct and Rebuttal Testimony of Mr. Christian), in order to accomplish our anticipated five year financing needs, the Company has improved its credit metrics through increased equity and decreased our reliance on debt financing, in order to access the capital markets on terms that will be more favorable than if we had not improved our credit metrics in recent years. The Company anticipates the continued need to invest in the safety and reliability of our gas distribution systems at levels that drive the need for incremental long-term financing, thus supporting our current credit metrics is very important. The lowered reliance on short-term debt is driven by the more frequent need to access the long-term debt markets, which is driven by higher levels of capital investment.

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-55**  
**Page 1 of 3**

**REQUEST:**

Provide a description of the major terms for each of the short-term debt instruments available to the Company, especially the one that requires the commitment fee reflected on Schedule J-2.

**RESPONSE:**

As of March 31, 2021 Atmos Energy Corporation had four short term lines of credit as described below:

**Atmos Energy Corporation lines of credit:**

**1. \$1.5 Billion Corporate Credit Facility**

- Amount: \$1,500,000,000
- Term: March 31, 2021 – March 31, 2026
- Interest Rate (2 options at Company's discretion):
  - Base Rate Loan are at the highest of: (i) Prime lending rate, (ii) Federal Funds Rate plus 50 basis points and (iii) one month Adjusted LIBO Rate plus 100 basis points
  - Euro Dollar loan rate is determined by LIBOR for the period of time of the loan divided by percentage equal to 1.00 minus the Eurodollar Reserve Percentage plus the Applicable Margin which is currently 100 basis points.
- Other relevant terms:
  - This facility has a commitment fee of 0.10% (Please see ratings-based commitment fee levels below)
  - This facility can be increased by \$250MM

**APPLICABLE MARGINS AND APPLICABLE PERCENTAGES**

Level	Rating Category: Moody's/S&P	Applicable Margin for Eurodollar Advances	Applicable Margin for Base Rate Advances	Applicable Commitment Fee Percentage
I	Aa3/AA- or higher	0.750%	0.000%	0.060%
II	A1/A+	0.875%	0.000%	0.080%
III	A2/A	1.000%	0.000%	0.100%
IV	A3/A-	1.125%	0.125%	0.125%
V	Baa1/BBB+ or lower	1.250%	0.250%	0.175%

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-55**  
**Page 2 of 3**

**2. \$900 Million Corporate Credit Facility**

- Amount: \$900,000,000
- Term: March 31, 2021 – March 31, 2024
- Interest Rate (2 options at Company’s discretion):
  - Base Rate Loan are at the highest of: (i) Prime lending rate, (ii) Federal Funds Rate plus 50 basis points and (iii) one month Adjusted LIBO Rate plus 100 basis points
  - Euro Dollar loan rate is determined by LIBOR for the period of time of the loan divided by percentage equal to 1.00 minus the Eurodollar Reserve Percentage plus the Applicable Margin which is currently 100 basis points.
- Other relevant terms:
  - This facility has a commitment fee of 0.09% (Please see ratings-based commitment fee levels below)

**APPLICABLE MARGINS AND APPLICABLE PERCENTAGES**

Level	Rating Category: Moody’s/S&P I	Applicable Margin for Eurodollar Advances	Applicable Margin for Base Rate Advances	Applicable Commitment Fee Percentage
I	Aa3/AA- or higher	0.750%	0.000%	0.050%
II	A1/A+	0.875%	0.000%	0.070%
III	A2/A	1.000%	0.000%	0.090%
IV	A3/A-	1.125%	0.125%	0.115%
V	Baa1/BBB+ or lower	1.250%	0.250%	0.165%

**3. \$50 Million Committed Facility with Amarillo National Bank**

- Counterparty: Amarillo National Bank
- Amount: \$50,000,000
- Term: April 1, 2021 – March 31, 2022
- This facility has a commitment fee of 0.125%
- Interest Rate: An agreed upon negotiated rate by and between Atmos Energy Corporation and Amarillo National Bank. This rate will be effective for one 24 hour period and will be negotiated for the next 24 hour period and each subsequent 24 hour period unless the next 24 hour period falls on a nationally proclaimed holiday.

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-55**  
**Page 3 of 3**

4. **\$50 Million Committed Facility with Bank of Texas**
- Counterparty: Bank of Texas
  - Amount: \$50,000,000
    - Limit of \$10,000,000 for Letters of Credit
  - Term: April 30, 2020 – April 29, 2021
  - Interest Rate: One month LIBOR plus 80 basis points
  - This facility is primarily used for Letters of Credit
  - Other relevant terms:
    - This facility has a commitment fee of 0.125%

Respondent: Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-56**  
**Page 1 of 1**

**REQUEST:**

To the extent not previously provided, provide all work papers and supporting documentation used and relied upon by Mr. D'Ascendis in the preparation of his Direct Testimony and exhibits. Provide all spreadsheets in Excel format with cell formulas intact.

**RESPONSE:**

Please see Attachment 2 to the Company's response to Staff DR No. 1-55.

Respondent: Dylan D'Ascendis

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-57**  
**Page 1 of 1**

**REQUEST:**

Provide copies of all articles and publications cited by Mr. D'Ascendis in his Direct Testimony.

**RESPONSE:**

Please see Attachment 3 to the Company's response to Staff DR No. 1-55.

Respondent: Dylan D'Ascendis

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-58**  
**Page 1 of 1**

**REQUEST:**

If not provided previously, provide all supporting documentation and spreadsheet analyses for Mr. D'Ascendis' size adjustment, the description of which begins on page 43 of his Direct Testimony.

**RESPONSE:**

Please see Attachment 2 to the Company's response to Staff DR No. 1-55.

Respondent: Dylan D'Ascendis



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-59**  
**Page 1 of 1**

**REQUEST:**

Provide the most recent update to the Blue Chip Financial Forecasts.

**RESPONSE:**

Please see Attachment 1.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-59\_Att1 - Blue Chip Financial Forecast.pdf, 19 Pages.

Respondent: Dylan D'Ascendis

# Blue Chip Financial Forecasts®

**Top Analysts' Forecasts Of U.S. And Foreign Interest Rates, Currency Values  
And The Factors That Influence Them**

**Vol. 40, No. 8, August 3, 2021**

**Wolters Kluwer**

# BLUE CHIP FINANCIAL FORECASTS®

Executive Editor:  
Joseph Aguinaldo  
Director of Data Research & Analytics  
Haver Analytics  
60 East 42<sup>nd</sup> Street  
New York, NY 10165  
Phone (212) 986-9300  
E-mail: [bluechip@haver.com](mailto:bluechip@haver.com)

Robert J. Eggert, Founder  
Randell E. Moore, Editor Emeritus  
Chris Sullivan, General Manager

**Blue Chip Financial Forecasts®** (ISSN: 0741-8345) is published monthly by CCH Incorporated, 28 Liberty St., 44th Floor New York, NY 10005-1400. Printed in the U.S.A.

**Subscriptions:** For information on annual subscriptions, format options (PDF, Excel, online), multiple-copy rates and/or site-license agreements please contact Peggy Hayner at: [peggy.hayner@wolterskluwer.com](mailto:peggy.hayner@wolterskluwer.com).

**Permission requests:** For information on how to obtain permission to reproduce content, please visit the Wolters Kluwer website at: <https://lrus.wolterskluwer.com/policies/permissions-reprints-and-licensing/>

**Purchasing reprints:** For customized article reprints, please contact *Wright's Media* at 1-877-652-5295 or go to the *Wright's Media* website at [www.wrightsmmedia.com](http://www.wrightsmmedia.com).

**Customer Service: 1-800-234-1660**

**To Order: 1-800-638-8437**

**Customer Service Fax: 1-800-901-9075**

**Email:** [customer.service@wolterskluwer.com](mailto:customer.service@wolterskluwer.com)

**Web Site:**

<https://lrus.wolterskluwer.com/corporate/blue-chip/>

**Blue Chip Financial Forecasts®** is a general circulation news monthly. No statement in this issue is to be construed as a recommendation to buy or sell securities or to provide investment advice. The editor and CCH Incorporated, while considering the contents to be reliable, take no responsibility for the information contained herein.

**Copyright © 2021 CCH Incorporated. All Rights Reserved.** This material may not be used, published, broadcast, rewritten, copied, redistributed or used to create any derivative works without written permission from the publisher.

## TABLE OF CONTENTS

<b>Domestic Commentary</b>	<b>p. 1</b>
<b>Domestic Summary Table</b> – Table of consensus forecasts of U.S. interest rates and key economic assumptions	<b>p. 2</b>
<b>International Summary Table</b> – Table of consensus forecasts of international interest rates and foreign exchange values	<b>p. 3</b>
<b>International Commentary</b> (by Sandy Batten)	<b>p. 3</b>
<b>Individual Panel Member's U.S. Forecasts</b> – Of interest rates and key assumptions for the next six quarters	<b>p. 4-9</b>
<b>Individual Panel Member's International Forecasts</b> – Of international interest rates and foreign exchange values	<b>p. 10-11</b>
<b>Viewpoints</b> – A sampling of views on the economy and government policy excerpted from recent reports issued by our panel members	<b>p. 12-13</b>
<b>Special Questions</b> – Results of special questions posed to panel members about the economy, financial markets and government policy	<b>p. 14</b>
<b>Databank</b> – Monthly historical data on many key indicators of economic activity	<b>p. 15</b>
<b>Calendar</b> – Release dates for important upcoming economic data, FOMC meetings, etc.	<b>p. 16</b>
<b>List of Contributing Economists</b> – To Domestic and International Survey	<b>inside of back cover</b>

## Growth, Inflation Strong Now, but Expected to Moderate; Markets Orderly

**COVID cases numbers turn sharply higher, but vaccines help a great deal.** Just a month ago in this space, we were happy to report about the decreasing trends in COVID infections and their constricting impact on economic activity in the U.S. and in many other places around the world. However, just a couple of days after the July issue was distributed, the tide turned and with the Delta variant, cases began to rise again. From a recent low of 11,299, the seven-day moving average of new cases has risen to 78,600 as of July 31. Federal, state and local governments, businesses and organizations are once again grappling with how open their activities should be during such a period. The Oxford University stringency index, a measure of economic “lockdown” had not moved much as of July 26, showing 49.54, up from 46.76 as of early June, but that is down from 61.57 from late June through early July.

Vaccinations remain an important mitigator, of course. The pace of injections had slowed through mid-July, touching a recent low of 507,020 for a seven-day moving average as of July 20; but the concerns over rising case numbers brought people to newly opening vaccination facilities. As of July 31, the seven-day moving average had advanced to 657,213. By that date, 49.17% of the population was reported to be fully vaccinated and 57.10% had at least one shot.

**GDP growth expected to be more than 7% this quarter.** The Blue Chip Financial Forecasts survey for this publication was collected on July 29 and 30, that is, right in the middle of this recent vaccination surge. After the recent report that GDP grew at a 6.5% seasonally adjusted annual rate in Q2, the panel estimates a 7.2% pace for Q3 and 5.5% for Q4. Despite the fact that Q2 growth was notably less than the 9.4% that the panel estimated just last month, their expectations for growth in Q3 and Q4 are thus very close to the 7.3% and 5.3% they projected last month. The similarity of growth forecasts suggests that there is little rationale in expectations for growth to cause a change in policy approaches going forward.

**Inflation still high, but forecast to moderate.** Inflation, however, continues to raise eyebrows. The 5.4% year-on-year increase in the CPI for June grabbed attention. Market participants and analysts with long memories began to talk about the double-digit price increases of the 1970s and 1980s. Could such strong and self-sustaining inflation trends be developing now?

So far, this does not appear to be the case. The Blue Chip Financial Forecast panel projects that the Federal Reserve’s target inflation measure, the PCE price index, will rise at a 3.7% annual rate this quarter, following its Q2 surge at a 6.4% pace. Then they look for the rate to settle back to 2.2%-2.3% through Q4 of 2022. This forecast trend is about the same as the pace in the panel’s July forecasts.

**Inflation seen as a result of COVID and supply-chain issue, not excess demand.** This month’s Special Questions give some background to the inflation situation. In a question about global economic stability, the panel responded most forcefully with concern about uneven vaccination rates and the emergence of the various mutations, including the Delta variant. Other suggested sources of stress in the global economy in-

clude supply chain disruptions and premature loosening of lockdown restrictions. The panelists suggest that easing supply chain disruptions would be the biggest help to getting inflation under control. Thus, it is not necessarily a situation of excess demand, but of constricted supply. Only a minority of respondents suggest that more traditional fiscal and monetary policy actions would be the keys to controlling the current inflation trends.

**Fed and Blue Chip panel look to moderating securities purchases as first monetary policy move.** As noted, this economic backdrop would thus produce little need for major monetary policy actions. The panel forecasts that the Federal Reserve will leave the federal funds rate in the 0%-0.25% band throughout the current forecast horizon, that is, through Q4 2022. At the press conference following last week’s FOMC meeting, Chair Powell did describe that they can adjust the amounts of Treasury and mortgage-backed bond purchases they makes each month as cautious first step in firming their policy. In response to two Special Questions, the Blue Chip panel does expect that this will happen during the first half of next year and that it will impact both Treasury and MBS bonds.

**Budget deficit huge, but seen as support, not inflation source.** The other major policy gauge, the federal government budget deficit, has finally begun to reflect the economic recovery. In June, for the first time since the pandemic started, the deficit for the fiscal-year-to-date was smaller than it had been a year earlier. The Blue Chip panel estimates, in response to a Special Question, that for this fiscal year as a whole, the deficit will be \$3.0 trillion, compared with \$3.132 trillion in fiscal 2020, and followed by \$1.5 trillion in fiscal 2022 (ending September 2022). A follow-up Special Question asks about the ramifications of deficits of this magnitude. A sizable portion of the panel believes those deficits will support economic growth and that the upward pressure they put on interest rates will not be so substantial as to squeeze growth. Regarding the impact on inflation, the panel is evenly divided about whether the deficits will raise inflation or not.

**Long-term interest rates are forecast to rise gently.** The special conditions associated with the pandemic have mixed implications for bond markets. The current growth and inflation patterns could be expected to make yields increase markedly. It is a historically remarkable situation that 10-year Treasuries can face such strong conditions, and yet be trading for under 1.50%. The Fed’s sizable Treasury and MBS purchases are helping, as well as widespread understanding that the current conditions are unique. The Blue Chip panel doesn’t expect Treasury yields will go down, by any means, but they do look for an orderly drift upward in coming months. Thus, 10-year Treasuries would average 1.63% during Q4 and 2% late in 2022. Corporate bonds rated AAA-AA have lately been hovering near 2.68% and the panel projects them at 3.0% by year-end and 3.3% in Q4 2022, and FHLMC mortgage rates were 2.8% last week, with the panel looking for 3.2% toward this year-end and 3.5% next year.

*Carol Stone, CBE (Haver Analytics, New York, NY)*

2 ■ BLUE CHIP FINANCIAL FORECASTS ■ AUGUST 3, 2021

Consensus Forecasts of U.S. Interest Rates and Key Assumptions

Interest Rates	History								Consensus Forecasts-Quarterly Avg.					
	Average For Week Ending				Average For Month				Latest Qtr	3Q 2021	4Q 2021	1Q 2022	2Q 2022	3Q 2022
	Jul 23	Jul 16	Jul 9	Jul 2	Jun	May	Apr	2Q 2021	2021	2021	2022	2022	2022	2022
Federal Funds Rate	0.10	0.10	0.10	0.10	0.08	0.06	0.07	0.07	0.1	0.1	0.1	0.1	0.1	0.1
Prime Rate	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.3	3.3	3.3	3.3	3.3	3.3
LIBOR, 3-mo.	0.13	0.13	0.13	0.14	0.13	0.15	0.18	0.16	0.2	0.2	0.2	0.3	0.3	0.3
Commercial Paper, 1-mo.	0.05	0.06	0.06	0.05	0.04	0.10	0.04	0.06	0.1	0.1	0.1	0.1	0.2	0.2
Treasury bill, 3-mo.	0.05	0.05	0.06	0.05	0.04	0.02	0.02	0.03	0.1	0.1	0.1	0.1	0.2	0.2
Treasury bill, 6-mo.	0.05	0.05	0.06	0.06	0.05	0.04	0.04	0.04	0.1	0.1	0.1	0.2	0.2	0.2
Treasury bill, 1 yr.	0.07	0.08	0.08	0.08	0.07	0.05	0.06	0.06	0.1	0.1	0.2	0.2	0.3	0.3
Treasury note, 2 yr.	0.21	0.24	0.22	0.25	0.20	0.16	0.16	0.17	0.2	0.3	0.4	0.5	0.5	0.6
Treasury note, 5 yr.	0.71	0.81	0.78	0.88	0.84	0.82	0.86	0.84	0.9	1.0	1.1	1.2	1.3	1.3
Treasury note, 10 yr.	1.26	1.36	1.34	1.47	1.52	1.62	1.64	1.59	1.5	1.6	1.8	1.9	1.9	2.0
Treasury note, 30 yr.	1.89	1.97	1.96	2.08	2.16	2.32	2.30	2.26	2.1	2.3	2.4	2.5	2.6	2.6
Corporate Aaa bond	2.69	2.74	2.74	2.81	2.91	3.06	3.04	3.00	2.8	3.0	3.1	3.2	3.3	3.3
Corporate Baa bond	3.13	3.19	3.19	3.26	3.35	3.52	3.51	3.46	3.5	3.7	3.9	4.0	4.1	4.2
State & Local bonds	2.59	2.60	2.63	2.66	2.64	2.64	2.66	2.65	2.4	2.5	2.6	2.6	2.7	2.7
Home mortgage rate	2.78	2.88	2.90	2.98	2.98	2.96	3.06	3.00	3.0	3.2	3.3	3.4	3.5	3.5

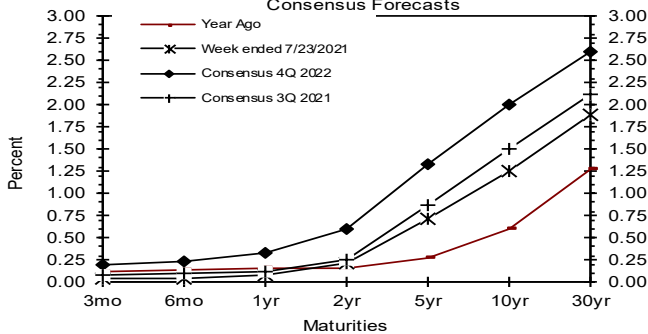
  

Key Assumptions	History								Consensus Forecasts-Quarterly					
	3Q 2019	4Q 2019	1Q 2020	2Q 2020	3Q 2020	4Q 2020	1Q 2021	2Q 2021	3Q 2021	4Q 2021	1Q 2022	2Q 2022	3Q 2022	4Q 2022
Fed's AFE \$ Index	110.6	110.5	111.4	112.4	107.3	105.2	103.4	102.9	104.5	104.4	104.0	103.9	103.9	104.0
Real GDP	2.8	1.9	-5.1	-31.2	33.8	4.5	6.3	6.5	7.2	5.5	4.0	3.3	2.7	2.3
GDP Price Index	1.4	1.5	1.6	-1.5	3.6	2.2	4.3	6.0	3.7	2.5	2.4	2.3	2.3	2.3
Consumer Price Index	1.3	2.6	1.0	-3.1	4.7	2.4	3.7	8.4	4.7	2.4	2.2	2.4	2.4	2.2
PCE Price Index	1.1	1.7	1.3	-1.6	3.7	1.5	3.8	6.4	3.7	2.2	2.1	2.3	2.2	2.2

Forecasts for interest rates and the Federal Reserve's Major Currency Index represent averages for the quarter. Forecasts for Real GDP, GDP Price Index, PCE Price Index and Consumer Price Index are seasonally-adjusted annual rates of change (saar). Individual panel members' forecasts are on pages 4 through 9. Historical data: Treasury rates from the Federal Reserve Board's H.15; AAA-AA and A-BBB corporate bond yields from Bank of America-Merrill Lynch and are 15+ years, yield to maturity; State and local bond yields from Bank of America-Merrill Lynch, A-rated, yield to maturity; Mortgage rates from Freddie Mac, 30-year, fixed; LIBOR quotes from Intercontinental Exchange. All interest rate data are sourced from Haver Analytics. Historical data for Fed's Major Currency Index are from FRSR H.10. Historical data for Real GDP, GDP Price Index and PCE Price Index are from the Bureau of Economic Analysis (BEA). Consumer Price Index history is from the Department of Labor's Bureau of Labor Statistics (BLS).

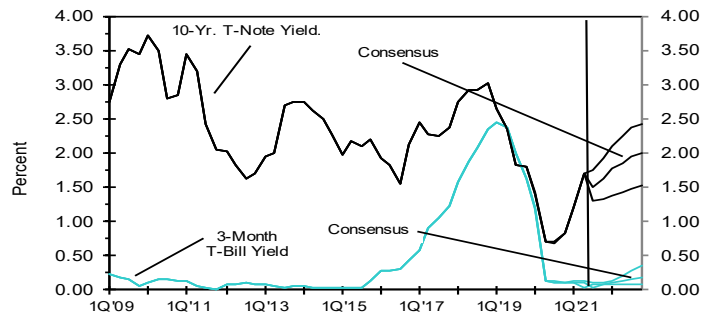
U.S. Treasury Yield Curve

Week ended July 23, 2021 & Year Ago v.s. 3Q 2021 & 4Q 2022 Consensus Forecasts



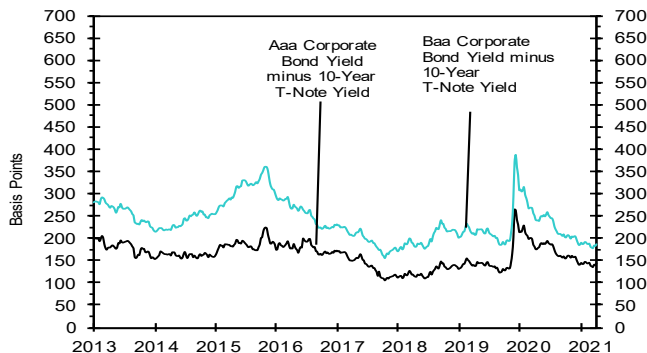
U.S. 3-Mo. T-Bills & 10-Yr. T-Note Yield

(Quarterly Average) Forecast



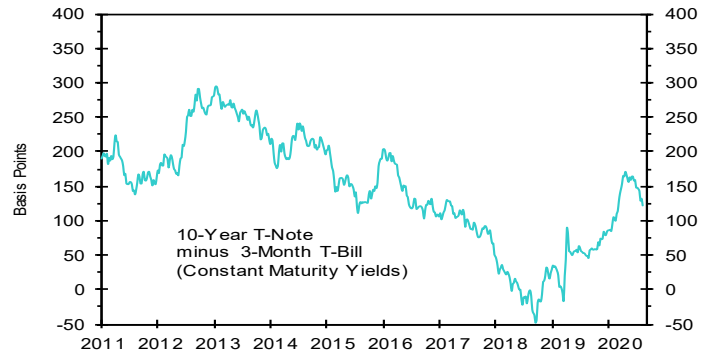
Corporate Bond Spreads

As of week ended July 23, 2021



U.S. Treasury Yield Curve

As of week ended July 23, 2021



-----Policy Rates<sup>1</sup>-----

	History			Consensus Forecasts		
	Month	Year	Months From Now:			
Latest:	Ago:	Ago:	3	6	12	
U.S.	0.13	0.13	0.13	<b>0.13</b>	<b>0.13</b>	<b>0.13</b>
Japan	-0.10	-0.10	-0.10	<b>-0.09</b>	<b>-0.09</b>	<b>-0.09</b>
U.K.	0.10	0.10	0.10	<b>0.10</b>	<b>0.10</b>	<b>0.11</b>
Switzerland	-0.75	-0.75	-0.75	<b>-0.75</b>	<b>-0.75</b>	<b>-0.75</b>
Canada	0.25	0.25	0.25	<b>0.25</b>	<b>0.25</b>	<b>0.28</b>
Australia	0.10	0.10	0.25	<b>0.11</b>	<b>0.12</b>	<b>0.13</b>
Euro area	0.00	0.00	0.00	<b>-0.06</b>	<b>-0.06</b>	<b>-0.06</b>

-----10-Yr. Government Bond Yields<sup>2</sup>-----

	History			Consensus Forecasts		
	Month	Year	Months From Now:			
Latest:	Ago:	Ago:	3	6	12	
U.S.	1.30	1.54	0.59	<b>1.67</b>	<b>1.85</b>	<b>2.13</b>
Germany	-0.42	-0.15	-0.45	<b>-0.18</b>	<b>-0.07</b>	<b>0.12</b>
Japan	0.02	0.06	0.02	<b>0.07</b>	<b>0.08</b>	<b>0.07</b>
U.K.	0.66	0.86	0.20	<b>0.87</b>	<b>1.00</b>	<b>1.25</b>
France	-0.08	0.20	-0.14	<b>0.05</b>	<b>0.19</b>	<b>0.37</b>
Italy	0.63	0.92	1.08	<b>0.85</b>	<b>1.02</b>	<b>1.25</b>
Switzerland	-0.37	-0.21	-0.49	<b>-0.18</b>	<b>-0.12</b>	<b>-0.01</b>
Canada	1.21	1.46	0.51	<b>1.58</b>	<b>1.78</b>	<b>2.01</b>
Australia	1.16	1.52	0.87	<b>1.64</b>	<b>1.86</b>	<b>2.05</b>
Spain	0.25	0.46	0.30	<b>0.41</b>	<b>0.56</b>	<b>0.77</b>

-----Foreign Exchange Rates<sup>3</sup>-----

	History			Consensus Forecasts		
	Month	Year	Months From Now:			
Latest:	Ago:	Ago:	3	6	12	
U.S.	105.17	103.66	107.85	<b>105.1</b>	<b>103.7</b>	<b>102.5</b>
Japan	110.52	110.78	105.79	<b>109.2</b>	<b>108.9</b>	<b>108.1</b>
U.K.	1.37	1.39	1.28	<b>1.41</b>	<b>1.42</b>	<b>1.45</b>
Switzerland	0.92	0.92	0.92	<b>0.92</b>	<b>0.92</b>	<b>0.91</b>
Canada	1.26	1.23	1.34	<b>1.25</b>	<b>1.25</b>	<b>1.25</b>
Australia	0.74	0.76	0.71	<b>0.77</b>	<b>0.76</b>	<b>0.76</b>
Euro	1.18	1.19	1.16	<b>1.20</b>	<b>1.21</b>	<b>1.23</b>

Consensus Policy Rates vs. US Rate

	Now	In 12 Mo.
Japan	-0.23	<b>-0.22</b>
U.K.	-0.03	<b>-0.02</b>
Switzerland	-0.88	<b>-0.88</b>
Canada	0.13	<b>0.15</b>
Australia	-0.03	<b>0.00</b>
Euro area	-0.13	<b>-0.19</b>

Consensus 10-Year Gov't Yields vs. U.S. Yield

	Now	In 12 Mo.
Germany	-1.72	<b>-2.01</b>
Japan	-1.29	<b>-2.07</b>
U.K.	-0.64	<b>-0.88</b>
France	-1.38	<b>-1.77</b>
Italy	-0.67	<b>-0.88</b>
Switzerland	-1.67	<b>-2.14</b>
Canada	-0.09	<b>-0.12</b>
Australia	-0.14	<b>-0.08</b>
Spain	-1.05	<b>-1.36</b>

**International.** Over the past month, global financial markets have been hit by the “double deltas.” First, the Delta COVID variant has led to a new wave of infections around the world. And though vaccinations still appear to be relatively effective with deaths and hospitalizations restrained so far, the rapid spread of the new variant has rekindled concerns that the reopening of economies will be paused (if not reversed) and that economic growth will not rebound to the extent that was previously expected. That brings us to the second delta, a letter in the Greek alphabet used to denote “change.” And the change in most recent economic data releases has been negative, indicating that the momentum of the rebound is slowing.

Notwithstanding increases in GDP growth in Q2 across most of the industrial world, the monthly PMIs generally fell in June and July, albeit from historically high levels. Moreover, recent data releases have been weaker than expected much more frequently. All this has been cause for concern in financial markets. Equity markets have been much more volatile and commodity prices are off their highs. Moreover, even though inflation remains elevated, the loss of growth momentum appears to have supplanted inflation concerns in the fixed income market as longer-term interest rates generally declined during July. Supply-chain bottle necks are persisting and impacting both inflation and production. The lack of some key production components (notably semiconductors) is simultaneously restraining production while putting upward pressure on prices.

With growth slowing and inflation elevated, monetary policymakers are currently facing a bit of a dilemma—supporting growth while at the same time restraining inflation. Most major central banks are not reacting to the recent acceleration in inflation as they consider it to be temporary. So, they have remained focused on promoting recovery from the pandemic. Our forecast panel expects no change in policy rates over the next 12 months from all seven of the central banks in our survey. However, some smaller developed economy central banks and several emerging market central banks have already begun to rein in monetary accommodation in response to a stronger-than-expected economic rebound and faster-than-expected inflation. The Bank of Canada is tapering its asset purchases and reduced the pace of purchases for a second time at its July monetary policy meeting. The Reserve Bank of Australia, at its July meeting, said it would begin to taper its asset purchases in September. The Reserve Bank of New Zealand unexpectedly and abruptly ended its asset purchase program in mid-July. And at its latest meeting, the Norges Bank (the central bank of Norway) effectively promised a policy rate hike by September. Some EM central banks have already begun to raise policy rates in response to rising inflation. In the past month or so, policy rates have been increased in Brazil (markedly), Mexico, Russia, Chile, Czech Republic and Hungary.

The three major central banks met during July and all three continued to look through the acceleration in inflation. The US Fed made no policy moves but did begin to discuss when to start to taper its asset purchases. The Bank of Japan also left policy unchanged though it did offer some details for its new funding program that will provide funding for loans or investments by financial institutions to firms that are addressing environmental issues.

The European Central Bank left its policy unchanged at its July meeting. However, given the changes to its policy strategy that had already been announced, it adjusted its forward guidance. It now expects policy rates to “remain at their present or lower levels until it sees inflation reaching 2% [the new target] well ahead of the projection horizon and durably for the rest of the projection horizon.” Since the Bank currently expects inflation to be well below target over its entire projection horizon (through 2023), it would seem that it anticipates a very accommodative stance for some time. President Lagarde said that the ECB’s asset purchase programs were not even discussed.

Forecasts of panel members are on pages 10 and 11. Definitions of variables are as follows: <sup>1</sup>Monetary policy rates. <sup>2</sup>Government bonds are yields to maturity. <sup>3</sup>Foreign exchange rate forecasts for U.K., Australia and the Euro are U.S. dollars per currency unit. For the U.S. dollar, forecasts are of the U.S. Federal Reserve Board’s AFE Dollar Index.

4 ■ BLUE CHIP FINANCIAL FORECASTS ■ AUGUST 3, 2021

## Third Quarter 2021 Interest Rate Forecasts

### Key Assumptions

Blue Chip Financial Forecasts Panel Members	-----Percent Per Annum -- Average For Quarter-----															Avg. For --Qtr-- A. Fed's Adv Fgn Econ \$ Index	----- (Q-Q % Change) ----- ----- (SAAR) -----							
	-----Short-Term-----					-----Intermediate-Term-----					-----Long-Term-----						B.	C.	D.	E.				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15						Real GDP	Price Index	Price Index	Price Index
	Federal Funds Rate	Prime Bank Rate	LIBOR Rate 3-Mo.	Com. Paper 1-Mo.	Treas. Bills 3-Mo.	Treas. Bills 6-Mo.	Treas. Bills 1-Yr.	Treas. Notes 2-Yr.	Treas. Notes 5-Yr.	Treas. Notes 10-Yr.	Treas. Bonds 30-Yr.	Aaa Corp. Bond	Baa Corp. Bond	State & Local Bonds	Home Mtg. Rate									
ACIMA Private Wealth	0.1	L 3.3	H 0.2	0.1	L 0.0	L 0.0	L 0.1	L 0.2	L 0.8	1.4	1.9	L 2.9	3.6	1.6	3.0	104.0	5.0	1.0	L 2.5	1.2	L			
Action Economics	0.1	L 3.3	H 0.2	0.1	L 0.1	0.1	0.1	L 0.3	0.9	1.5	2.1	2.8	3.6	2.8	3.2	102.9	7.0	3.4	5.3	3.8				
AIG	0.1	L 3.3	H 0.2	na	0.0	L 0.1	0.1	L 0.3	1.0	1.6	2.2	na	3.5	na	3.0	na	8.0	3.4	3.1	2.7				
Amherst Pierpont Securities	0.1	L 3.3	H 0.1	L 0.1	L 0.0	L 0.1	0.1	L 0.3	0.8	1.4	2.1	2.7	3.4	2.1	3.0	104.8	10.5	H 4.1	6.7	4.4				
Bank of America	0.1	L na	0.1	L na	na	na	na	0.3	1.0	1.7	2.3	na	na	na	na	na	7.0	3.9	5.9	3.6				
Barclays	0.1	L 3.3	H na	na	na	na	na	0.3	1.0	1.7	2.3	na	na	na	na	na	7.0	5.0	8.2	H 5.4				
BBVA USA	0.1	L 3.3	H 0.1	L 0.1	L 0.1	0.1	0.1	L 0.2	L 0.8	1.4	2.0	2.8	3.2	L 1.5	2.8	104.9	6.4	2.4	2.5	2.3				
BMO Capital Markets	0.1	L 3.3	H 0.1	L na	0.1	0.1	0.1	L 0.2	L 0.8	1.3	L 1.9	L na	na	na	2.7	L 104.0	6.0	4.3	7.6	6.6	H			
BNP Paribas Americas	0.1	L na	na	na	na	na	na	0.3	na	1.7	2.3	na	na	na	na	na	9.9	na	5.3	4.5				
Chan Economics	0.1	L 3.3	H 0.2	0.1	L 0.1	0.1	0.1	L 0.2	L 0.7	L 1.3	L 1.9	L 2.6	3.4	2.1	2.8	105.0	7.7	3.2	3.7	3.2				
Chimura Economics & Analytics	0.1	L 3.3	H 0.1	L 0.1	L 0.1	0.1	0.1	L 0.2	L 0.8	1.3	L 2.0	2.6	na	na	2.9	na	5.9	4.3	4.7	na				
Comerica Bank	0.1	L 3.2	L 0.2	na	0.1	0.1	0.1	L 0.2	L 0.8	1.4	1.9	L na	na	na	3.0	na	5.5	3.9	7.4	5.7				
Daiwa Capital Markets America	0.1	L 3.3	H 0.2	0.1	L 0.1	0.1	0.1	L 0.2	L 0.7	L 1.3	L 1.9	L 2.6	3.3	na	2.8	105.0	6.0	3.2	3.5	3.3				
DePrince & Assoc.	0.1	L 3.2	L 0.2	0.1	L 0.1	0.1	0.1	L 0.3	0.8	1.4	2.0	2.7	3.4	2.2	2.9	105.0	6.1	3.1	3.7	3.2				
Economist Intelligence Unit	0.1	L 3.3	H na	0.1	L 0.1	0.1	0.1	L 0.2	L 0.8	1.4	2.0	na	na	na	2.9	na	5.1	na	2.0	na				
Fannie Mae	0.1	L 3.3	H na	na	0.1	0.1	0.1	L 0.2	L 0.8	1.3	L 1.9	L na	na	na	2.8	na	7.1	4.6	4.6	4.0				
Georgia State University	0.1	L 3.3	H na	na	0.0	L 0.1	0.1	L 0.2	L 0.7	L 1.3	L 2.0	2.4	3.4	na	2.9	na	3.5	L 3.5	4.1	3.3				
GLC Financial Economics	0.1	L 3.3	H 0.3	0.1	L 0.1	0.1	0.1	L 0.2	L 0.9	1.4	1.9	L 3.3	3.8	2.7	2.7	L 102.5	L 7.2	2.9	2.9	3.9				
Goldman Sachs & Co.	0.1	L na	0.2	na	0.1	na	na	0.3	0.9	1.9	H 2.6	na	na	na	na	na	9.0	3.8	7.0	4.4				
Grant Thornton/Diane Swonk	0.1	L 3.3	H 0.2	0.1	L 0.0	L 0.1	0.1	L 0.2	L 0.7	L 1.5	2.2	3.0	3.3	na	2.9	na	7.8	2.9	2.6	2.3				
IHS Markit	0.1	L 3.3	H 0.2	na	0.1	0.1	0.1	L 0.3	1.0	1.6	2.2	na	na	na	3.0	na	7.6	3.2	2.8	2.9				
J.P. Morgan Chase	0.1	L na	0.2	na	na	na	na	0.2	L 1.0	1.8	2.6	na	na	na	na	na	8.3	3.3	7.2	4.1				
Loomis, Sayles & Company	0.1	L 3.3	H 0.1	L 0.1	L 0.1	0.1	0.1	L 0.2	L 0.8	1.4	2.0	2.6	3.2	L 2.6	2.9	104.9	9.6	3.8	4.1	3.3				
MacroFin Analytics & Rutgers Bus School	0.1	L 3.3	H 0.2	0.1	L 0.1	0.1	0.1	L 0.2	L 0.8	1.3	L 2.0	2.7	3.2	L 2.6	2.8	105.8	7.4	4.5	3.0	3.3				
Moody's Analytics	0.1	L 3.3	H 0.2	0.1	L 0.1	0.1	0.3	H 0.5	H 1.1	H 1.7	2.7	H 3.1	3.8	2.7	3.6	na	6.6	2.3	2.8	2.6				
Naroff Economic Advisors	0.1	L 3.3	H 0.2	0.1	L 0.1	0.1	0.1	L 0.2	L 0.7	L 1.5	2.2	2.7	4.4	2.7	3.1	103.9	5.0	3.8	4.2	4.0				
NatWest Markets	0.1	L 3.2	L 0.3	0.2	H 0.1	0.2	H 0.3	H 0.4	1.1	H 1.5	2.1	3.6	H 4.6	H 3.4	H 3.7	H na	7.5	1.9	5.9	3.7				
Nomura Securities, Inc.	0.1	L 3.3	H na	na	na	na	na	0.2	L 0.8	1.6	na	na	na	na	na	na	6.7	4.2	6.4	4.3				
Oxford Economics	0.1	L 3.3	H 0.2	na	0.0	L 0.0	L 0.1	L 0.2	L 1.0	1.7	2.4	2.2	L na	na	3.2	104.0	9.8	4.7	5.9	5.2				
PNC Financial Services Corp.	0.1	L 3.3	H 0.1	L na	0.1	0.1	0.1	L 0.2	L 0.8	1.5	2.1	na	3.4	1.6	3.0	104.0	8.5	4.0	3.6	3.8				
RDQ Economics	0.1	L 3.3	H 0.2	0.2	H 0.1	0.1	0.2	0.2	L 0.7	L 1.5	2.2	2.8	3.5	2.4	3.0	104.8	8.0	4.5	6.0	3.4				
Regions Financial Corporation	0.1	L 3.3	H 0.1	L 0.1	L 0.1	0.1	0.1	L 0.2	L 0.8	1.3	L 1.9	L 2.6	3.4	2.3	2.8	104.6	6.8	4.0	4.4	4.1				
S&P Global	0.1	L 3.3	H 0.2	na	0.1	0.1	0.1	L 0.2	L 1.0	1.8	2.6	na	na	na	3.1	na	5.6	2.8	2.5	2.3				
Scotiabank Group	0.1	L 3.3	H na	na	0.1	na	na	0.4	1.0	1.6	2.1	na	na	na	na	na	10.3	6.4	6.3	5.0				
Societe Generale	0.1	L 3.3	H 0.2	0.1	L 0.1	0.1	0.1	L 0.2	L 0.9	1.4	2.1	na	na	1.0	L 3.0	na	7.0	3.7	6.1	5.0				
Swiss Re	0.1	L 3.3	H 0.2	0.1	L 0.0	L 0.1	0.1	L 0.3	0.8	1.4	2.0	2.6	3.3	na	3.1	105.9	H 6.3	8.4	H 7.5	4.9				
The Northern Trust Company	0.1	L 3.3	H 0.2	0.1	L 0.1	0.1	0.1	L 0.2	L 0.8	1.5	2.0	2.6	3.3	2.7	2.9	105.0	6.5	2.9	3.3	3.0				
Thru the Cycle	0.1	L 3.3	H 0.1	L 0.1	L 0.1	0.1	0.1	L 0.2	L 0.8	1.4	2.0	2.8	3.2	L 2.6	3.0	105.5	7.4	3.5	5.3	3.9				
TS Lombard	0.1	L 3.2	L 0.4	H 0.2	H 0.2	H 0.2	H 0.3	H 0.4	1.1	H 1.7	2.4	3.2	4.0	2.3	3.7	H 104.0	5.5	1.6	1.6	L 1.6				
Via Nova Investment Mgt.	0.1	L 3.3	H 0.2	0.1	L 0.0	L 0.0	L 0.1	L 0.2	L 0.7	L 1.3	L 1.9	L 3.0	3.4	2.5	3.0	103.0	6.5	2.1	2.5	2.0				
Wells Fargo	0.1	L 3.3	H 0.2	0.1	L 0.1	0.1	0.1	L 0.2	L 0.9	1.9	H 2.1	3.1	3.9	3.0	3.2	na	8.8	4.8	6.2	4.8				
<b>August Consensus</b>	<b>0.1</b>	<b>3.3</b>	<b>0.2</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	<b>0.2</b>	<b>0.9</b>	<b>1.5</b>	<b>2.1</b>	<b>2.8</b>	<b>3.5</b>	<b>2.4</b>	<b>3.0</b>	<b>104.5</b>	<b>7.2</b>	<b>3.7</b>	<b>4.7</b>	<b>3.7</b>				
Top 10 Avg.	0.1	3.3	0.2	0.1	0.1	0.1	0.2	0.4	1.0	1.8	2.4	3.1	3.9	2.8	3.3	105.2	9.3	5.2	7.1	5.2				
Bottom 10 Avg.	0.1	3.3	0.1	0.1	0.0	0.1	0.1	0.2	0.7	1.3	1.9	2.6	3.3	1.9	2.8	103.7	5.3	2.3	2.5	2.3				
July Consensus	0.1	3.3	0.2	0.1	0.1	0.1	0.1	0.3	1.0	1.7	2.4	3.0	3.8	2.5	3.2	103.4	7.3	3.0	3.6	3.1				
Number of Forecasts Changed From A Month Ago:																								
Down	0	1	9	0	3	3	2	12	26	33	33	21	22	15	28	2	16	4	2	5				
Same	41	35	25	24	26	28	30	23	13	8	7	3	2	6	5	4	10	10	12	12				
Up	0	1	0	1	6	2	2	6	1	0	0	1	1	0	1	15	15	24	27	22				
Diffusion Index	50%	50%	37%	52%	54%	48%	50%	43%	19%	10%	9%	10%	8%	14%	10%	81%	49%	76%	80%	72%				

# Fourth Quarter 2021

## Interest Rate Forecasts

## Key Assumptions

Blue Chip Financial Forecasts Panel Members	Percent Per Annum -- Average For Quarter--																		Avg. For --Qtr.-- Fed's Adv Fgn Econ \$ Index	(Q-Q % Change)														
	Short-Term						Intermediate-Term						Long-Term							(SAAR)														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	A.	B.	C.		D.	E.													
	Federal Funds Rate	Prime Bank Rate	LIBOR Rate 3-Mo.	Com. Paper 1-Mo.	Treas. Bills 3-Mo.	Treas. Bills 6-Mo.	Treas. Bills 1-Yr.	Treas. Notes 2-Yr.	Treas. Notes 5-Yr.	Treas. Notes 10-Yr.	Treas. Bond 30-Yr.	Aaa Corp. Bond	Baa Corp. Bond	State & Local Bonds	Home Mtg. Rate	Fed's Adv Fgn Econ \$ Index	Real GDP	Price Index		Cons. Price Index	PCE Price Index													
ACIMA Private Wealth	0.1	L	3.3	H	0.2	0.1	L	0.0	L	0.0	L	0.1	L	0.2	L	0.7	L	1.3	L	1.9	L	3.0	3.8	1.5	2.8	L	103.0	3.0	1.0	2.4	1.3			
Action Economics	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.1	L	0.5	1.1	1.7	2.3	3.0	3.8	2.9	3.3	na	na	na	na	na	na	na	na	103.8	5.5	1.7	1.6	1.4		
AIG	0.1	L	3.3	H	0.2	na	0.1	0.1	0.1	L	0.3	1.0	1.7	2.2	na	3.5	na	3.2	na	na	na	na	na	na	na	na	na	6.0	1.8	1.6	1.7			
Amherst Pierpont Securities	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.2	0.4	1.1	1.8	2.6	3.2	3.9	2.5	3.5	na	na	na	na	na	na	na	na	105.5	7.1	3.0	2.5	2.0			
Bank of America	0.1	L	na	0.2	na	na	na	na	na	0.3	1.2	1.9	2.4	na	na	na	na	na	na	na	na	na	na	na	na	na	na	6.0	2.4	1.5	1.1			
Barclays	0.1	L	3.3	H	na	na	na	na	na	0.3	1.1	1.7	2.3	na	na	na	na	na	na	na	na	na	na	na	na	na	na	6.5	2.8	3.8	2.7			
BBVA USA	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	L	0.3	1.0	1.6	2.4	3.0	3.5	1.8	3.1	na	na	na	na	na	na	na	na	104.5	4.5	2.2	2.5	2.2			
BMO Capital Markets	0.1	L	3.3	H	0.1	L	na	0.1	0.1	L	0.3	0.8	1.4	2.0	na	na	na	2.8	L	103.3	5.0	3.2	4.1	3.8	na	na	3.3	na	1.4	1.3				
BNP Paribas Americas	0.1	L	na	na	na	na	na	na	na	0.4	na	1.9	2.4	na	na	na	na	na	na	na	na	na	na	na	na	na	na	3.3	na	1.4	1.3			
Chan Economics	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	L	0.2	L	0.7	L	1.3	L	1.9	L	2.6	3.4	2.1	2.8	L	104.8	5.0	2.3	2.4	2.2	na	na	na	na		
Chmura Economics & Analytics	0.1	L	3.3	H	0.1	L	0.1	L	0.1	0.1	L	0.2	L	0.8	1.4	2.0	2.6	na	na	na	3.0	na	na	na	na	na	na	4.1	3.2	3.3	na			
Comerica Bank	0.1	L	3.2	L	0.2	na	0.1	0.1	0.1	L	0.3	0.9	1.5	2.0	na	na	na	2.9	na	na	na	2.9	na	na	na	na	na	4.9	3.1	5.6	H	4.3	H	
Daiwa Capital Markets America	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	L	0.3	0.8	1.3	L	2.0	2.7	3.3	na	2.8	L	105.0	4.7	3.0	3.2	3.0	na	na	4.7	3.0	3.2	3.0			
DePrince & Assoc.	0.1	L	3.2	L	0.2	0.2	H	0.1	0.1	L	0.3	0.9	1.5	2.1	3.0	4.0	2.6	3.1	na	na	na	3.0	na	na	na	na	105.4	4.7	2.8	2.8	2.7			
Economist Intelligence Unit	0.1	L	3.3	H	na	0.1	L	0.1	0.1	L	0.3	0.9	1.4	2.1	na	na	na	3.0	na	na	na	3.0	na	na	na	na	na	6.6	na	0.7	na			
Fannie Mae	0.1	L	3.3	H	na	na	0.1	0.1	0.1	L	0.3	0.8	1.3	L	1.9	L	na	na	na	2.9	na	na	na	na	na	na	na	6.6	3.4	4.2	3.4			
Georgia State University	0.1	L	3.3	H	na	na	0.1	0.1	0.1	L	0.2	L	0.8	1.4	2.0	2.5	3.7	na	3.0	na	na	3.0	na	na	na	na	2.3	L	2.9	2.2	2.5			
GLC Financial Economics	0.1	L	3.3	H	0.3	0.2	H	0.1	0.1	L	0.3	0.9	1.3	L	2.0	3.7	H	4.0	2.7	3.6	102.2	L	6.6	3.9	3.9	3.2	na	na	na	na	na			
Goldman Sachs & Co.	0.1	L	na	0.2	na	0.1	na	na	na	0.3	0.9	1.9	2.6	na	na	na	na	na	na	na	na	na	na	na	na	na	na	5.5	1.0	1.8	1.5			
Grant Thornton/Diane Swonk	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	L	0.3	1.0	1.6	2.3	3.2	3.5	na	3.1	na	na	na	3.1	na	na	na	na	na	7.8	1.1	1.3	1.1			
IHS Markit	0.1	L	3.3	H	0.2	na	0.1	0.1	L	0.3	1.0	1.7	2.2	na	na	na	3.2	na	na	na	3.2	na	na	na	na	na	na	8.2	H	1.7	1.8	2.0		
J.P. Morgan Chase	0.1	L	na	0.2	na	na	na	na	na	0.3	1.1	1.9	2.6	na	na	na	na	na	na	na	na	na	na	na	na	na	na	3.0	1.9	3.0	2.7			
Loomis, Sayles & Company	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	L	0.3	0.9	1.5	2.3	2.7	3.4	2.6	3.0	na	na	na	3.0	105.1	7.3	1.8	1.9	1.7	na	na	na	na			
MacroFin Analytics & Rutgers Bus School	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	L	0.3	0.8	1.4	2.0	2.8	3.2	L	2.6	3.0	105.9	5.2	2.4	2.3	2.3	na	na	na	na	na	na				
Moody's Analytics	0.1	L	3.3	H	0.3	0.1	L	0.1	0.2	H	0.4	H	0.7	H	1.4	H	1.9	2.9	H	3.4	4.2	3.0	3.8	na	na	na	na	6.3	2.7	2.7	2.7			
Naroff Economic Advisors	0.1	L	3.3	H	0.3	0.1	L	0.1	0.1	0.2	0.3	0.9	1.7	2.4	2.9	4.7	H	2.8	3.3	104.1	4.4	3.1	3.3	3.3	na	na	na	na	na	na				
NatWest Markets	0.1	L	3.2	L	0.3	0.2	H	0.1	0.2	H	0.3	0.5	1.3	1.7	2.2	3.6	4.5	3.3	H	3.8	na	na	na	na	na	na	na	7.5	0.5	L	1.8	1.5		
Nomura Securities, Inc.	0.1	L	3.3	H	na	na	na	na	na	0.2	L	0.9	1.7	na	na	na	na	na	na	na	na	na	na	na	na	na	na	5.1	4.5	2.4	1.8			
Oxford Economics	0.1	L	3.3	H	0.2	na	0.1	0.1	L	0.2	L	1.1	1.9	2.6	2.3	L	na	na	3.2	103.8	3.4	2.1	1.2	1.5	na	na	na	na	na	na	na			
PNC Financial Services Corp.	0.1	L	3.3	H	0.2	na	0.1	0.1	L	0.3	1.0	1.7	2.5	na	3.9	2.0	3.3	na	na	na	3.3	105.1	6.3	2.2	1.0	1.3	na	na	na	na	na			
RDQ Economics	0.1	L	3.3	H	0.2	0.2	H	0.1	0.1	0.2	0.3	0.9	1.9	2.6	3.2	3.9	2.9	3.4	na	na	na	3.4	103.6	6.6	2.8	3.0	3.0	na	na	na	na			
Regions Financial Corporation	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	L	0.3	0.8	1.4	2.0	2.7	3.5	2.3	2.9	na	na	na	3.3	103.5	7.1	3.7	2.6	2.3	na	na	na	na			
S&P Global	0.1	L	3.3	H	0.2	na	0.1	0.2	H	0.1	L	0.2	L	1.2	2.0	H	2.8	na	na	na	3.3	na	na	na	na	na	na	3.7	1.2	0.9	0.9			
Scotiabank Group	0.1	L	3.3	H	na	na	0.1	na	na	0.6	1.3	2.0	H	2.3	na	na	na	na	na	na	na	na	na	na	na	na	na	6.5	2.5	-0.9	L	-0.3	L	
Societe Generale	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	L	0.2	L	1.0	1.6	2.2	na	na	1.1	L	3.1	na	na	na	na	na	na	na	4.8	2.3	3.0	2.7			
Swiss Re	0.1	L	3.3	H	0.4	H	0.2	H	0.0	L	0.1	0.2	0.4	1.0	1.6	2.3	2.9	3.5	na	3.4	106.1	6.2	7.5	H	3.5	2.8	na	na	na	na	na			
The Northern Trust Company	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.2	0.3	1.0	1.6	2.3	2.9	3.6	2.9	3.2	na	na	na	3.2	103.0	5.3	2.3	2.5	2.3	na	na	na	na			
Thru the Cycle	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	L	0.2	L	0.8	1.5	2.2	2.9	3.3	2.7	3.1	106.7	H	5.3	3.2	2.8	2.7	na	na	na	na	na	na			
TS Lombard	0.1	L	3.2	L	0.4	H	0.2	H	0.2	H	0.4	H	0.6	1.3	2.0	H	2.7	3.5	4.3	2.6	4.0	H	104.0	4.5	1.6	1.6	1.6	na	na	na	na			
Via Nova Investment Mgt.	0.1	L	3.3	H	0.2	0.1	L	0.0	L	0.0	L	0.1	L	0.2	L	0.8	1.3	L	2.0	2.8	3.2	L	2.3	2.8	L	104.0	4.5	2.0	2.2	1.9				
Wells Fargo	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	L	0.3	1.0	2.0	H	2.2	3.2	4.0	3.1	3.4	na	na	na	na	na	na	na	na	8.1	2.6	2.8	2.6			
<b>August Consensus</b>	<b>0.1</b>	<b>3.3</b>	<b>0.2</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	<b>0.3</b>	<b>1.0</b>	<b>1.6</b>	<b>2.3</b>	<b>3.0</b>	<b>3.7</b>	<b>2.5</b>	<b>3.2</b>	<b>104.4</b>	<b>5.5</b>	<b>2.5</b>	<b>2.4</b>	<b>2.2</b>														
Top 10 Avg.	0.1	3.3	0.3	0.2	0.1	0.1	0.2	0.5	1.2	1.9	2.6	3.3	4.1	2.9	3.6	105.4	7.3	3.9	3.8	3.2														
Bottom 10 Avg.	0.1	3.3	0.2	0.1	0.1	0.1	0.1	0.2	0.8	1.3	2.0	2.7	3.4	2.1	2.9	103.4	3.6	1.3	1.0	1.1														
July Consensus	0.1	3.3	0.2	0.1	0.1	0.1	0.2	0.3	1.1	1.8	2.5	3.2	4.0	2.6	3.3	103.3	5.3	2.3	2.2	2.1														
Number of Forecasts Changed From A Month Ago:																																		
Down	0	1	4	1	1	3	6	6	24	31	32	20	19	15	23	2	12	10	8	12														
Same	41	35	29	21	29	30	28	29	14	10	8	4	6	6	10	6	13	12	13	12														
Up	0	1	1	3	5	0	0	6	2	0	0	1	0	0	1	13	16	16	20	15														
Diffusion Index	50%	50%	46%	54%	56%	45%	41%	50%	23%	12%	10%	12%	12%	14%	18%	76%	55%	58%	65%	54%														



# First Quarter 2022

## Interest Rate Forecasts

## Key Assumptions

Blue Chip Financial Forecasts Panel Members	Percent Per Annum -- Average For Quarter															Avg. For --Qtr.-- A. Fed's Adv Fgn Econ \$ Index	(Q-Q % Change)																	
	Short-Term					Intermediate-Term					Long-Term						B. Real GDP	C. GDP Price Index	D. Cons. Price Index	E. PCE Price Index														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15																			
	Federal Funds Rate	Prime Bank Rate	LIBOR Rate 3-Mo.	Com. Paper 1-Mo.	Treas. Bills 3-Mo.	Treas. Bills 6-Mo.	Treas. Bills 1-Yr.	Treas. Notes 2-Yr.	Treas. Notes 5-Yr.	Treas. Notes 10-Yr.	Treas. Bonds 30-Yr.	Aaa Corp. Bond	Baa Corp. Bond	State & Local Bonds	Home Mtg. Rate																			
ACIMA Private Wealth	0.1	L	3.3	H	0.2	0.1	L	0.0	L	0.0	L	0.1	L	0.2	L	0.6	L	1.3	1.8	L	3.0	3.9	1.4	2.6	L	101.0	3.0	1.2	2.0	1.2				
Action Economics	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.2	0.5	1.2	1.9	2.5	3.0	3.9	2.9	3.5	103.5	4.4	2.0	2.1	1.8	na	na	na	na	na	na	na	na	na		
AIG	0.1	L	3.3	H	0.3	na	0.1	0.1	0.1	L	0.4	1.1	1.8	2.4	na	3.6	na	3.3	na	4.0	1.9	2.2	1.9	106.5	4.6	2.9	2.9	2.6	na	na	na	na		
Amherst Pierpont Securities	0.1	L	3.3	H	0.3	0.1	L	0.1	0.2	0.3	0.5	1.4	2.2	H	3.0	3.6	4.3	2.8	3.9	106.5	4.6	2.9	2.9	2.6	na	na	na	na	na	na	na	na		
Bank of America	0.1	L	na	0.2	na	na	na	na	na	0.4	1.4	2.0	2.5	na	na	na	na	na	na	6.0	H	2.8	1.6	1.5	na	na	na	na	na	na	na	na		
Barclays	0.1	L	3.3	H	na	na	na	na	na	0.4	1.2	1.8	2.3	na	na	na	na	na	na	3.0	2.1	1.9	1.9	1.8	na	na	na	na	na	na	na	na		
BBVA USA	0.1	L	3.3	H	0.2	0.2	H	0.1	0.2	0.2	0.4	1.2	1.9	2.7	3.3	3.9	2.1	3.4	104.2	5.1	2.2	2.2	2.1	na	na	na	na	na	na	na	na	na		
BMO Capital Markets	0.1	L	3.3	H	0.1	L	na	0.1	0.1	0.1	L	0.3	0.9	1.6	2.2	na	na	na	3.0	102.8	3.5	2.7	3.2	2.9	na	na	na	na	na	na	na	na		
BNP Paribas Americas	0.1	L	na	na	na	na	na	na	na	0.6	na	2.0	2.5	na	na	na	na	na	na	3.3	na	1.1	1.3	1.3	na	na	na	na	na	na	na	na		
Chan Economics	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.1	L	0.2	L	0.7	1.3	1.9	2.6	3.4	2.1	102.9	3.7	2.2	2.3	2.2	na	na	na	na	na	na	na	na		
Chmura Economics & Analytics	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.1	L	0.3	0.8	1.5	2.1	2.7	na	na	3.1	na	4.8	2.8	3.1	na	na	na	na	na	na	na	na	na		
Comerica Bank	0.1	L	3.2	L	0.3	na	0.1	0.1	0.2	0.4	0.9	1.6	2.1	na	na	na	na	2.9	na	4.3	2.3	3.9	H	2.9	na	na	na	na	na	na	na	na		
Daiwa Capital Markets America	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.1	L	0.3	0.9	1.4	2.1	2.8	3.5	na	3.0	106.0	3.7	3.0	3.2	3.0	na	na	na	na	na	na	na	na		
DePrince & Assoc.	0.1	L	3.2	L	0.2	0.2	H	0.1	0.1	0.2	0.4	1.0	1.6	2.2	3.2	4.1	2.7	3.2	105.1	3.6	2.6	2.6	2.5	na	na	na	na	na	na	na	na	na		
Economist Intelligence Unit	0.1	L	3.3	H	na	0.1	L	0.1	0.1	0.1	L	0.3	1.0	1.7	2.3	na	na	na	3.1	na	2.9	na	2.2	na	na	na	na	na	na	na	na	na		
Fannie Mae	0.1	L	3.3	H	na	na	0.1	0.1	0.2	0.4	0.9	1.4	2.0	na	na	na	na	3.0	na	3.6	3.2	3.3	3.0	3.0	na	na	na	na	na	na	na	na		
Georgia State University	0.1	L	3.3	H	na	na	0.1	0.1	0.1	0.1	L	0.3	0.9	1.6	2.2	2.6	4.1	na	3.3	na	2.9	2.2	2.0	2.2	na	na	na	na	na	na	na	na		
GLC Financial Economics	0.1	L	3.3	H	0.4	0.2	H	0.1	0.2	0.2	0.3	1.0	1.1	L	1.9	3.4	4.2	2.7	3.6	102.0	5.7	3.6	3.6	3.0	na	na	na	na	na	na	na	na		
Goldman Sachs & Co.	0.1	L	na	0.2	na	0.1	na	0.1	na	na	na	na	2.0	na	na	na	na	na	na	na	4.0	1.2	2.1	1.3	na	na	na	na	na	na	na	na		
Grant Thornton/Diane Swonk	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.1	L	0.3	1.1	1.9	2.5	3.4	3.8	na	3.4	na	5.3	1.8	1.9	1.7	na	na	na	na	na	na	na	na		
IHS Markit	0.1	L	3.3	H	0.3	na	0.1	0.1	0.1	L	0.4	1.1	1.8	2.4	na	na	na	3.3	na	3.8	1.8	2.0	2.0	2.0	na	na	na	na	na	na	na	na		
J.P. Morgan Chase	0.1	L	na	0.2	na	na	na	na	na	0.4	1.2	2.0	2.7	na	na	na	na	na	na	3.5	2.0	2.4	2.1	2.1	na	na	na	na	na	na	na	na		
Loomis, Sayles & Company	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.2	0.3	1.1	1.9	2.6	3.1	3.8	2.9	3.4	105.1	3.7	1.9	1.8	1.7	1.7	na	na	na	na	na	na	na	na		
MacroFin Analytics & Rutgers Bus School	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.1	L	0.3	0.9	1.4	2.0	2.8	3.3	L	2.7	106.1	3.5	2.2	2.2	2.2	na	na	na	na	na	na	na	na		
Moody's Analytics	0.1	L	3.3	H	0.3	0.1	L	0.2	H	0.3	H	0.5	H	0.9	H	1.6	H	2.1	3.1	H	6.0	H	2.5	2.4	2.4	na	na	na	na	na	na	na	na	
Naroff Economic Advisors	0.1	L	3.3	H	0.3	0.2	H	0.2	H	0.2	0.2	0.4	1.0	1.9	2.7	3.1	4.8	H	3.0	104.6	3.3	2.6	2.7	2.7	na	na	na	na	na	na	na	na		
NatWest Markets	0.1	L	3.2	L	0.3	0.2	H	0.1	0.2	0.3	0.7	1.4	1.8	2.3	2.7	3.7	2.3	2.7	na	3.7	1.7	2.0	3.8	H	na	na	na	na	na	na	na	na		
Nomura Securities, Inc.	0.1	L	3.3	H	na	na	na	na	na	0.3	1.0	1.7	na	na	na	na	na	na	na	3.9	5.2	H	1.4	1.1	L	na	na	na	na	na	na	na		
Oxford Economics	0.1	L	3.3	H	0.2	na	0.1	0.2	0.2	0.2	L	1.2	2.1	2.8	2.4	L	na	na	3.3	103.6	2.5	1.3	1.4	1.2	na	na	na	na	na	na	na	na		
PNC Financial Services Corp.	0.1	L	3.3	H	0.2	na	0.1	0.1	0.2	0.3	1.1	1.9	2.7	na	4.1	2.2	3.5	105.6	4.7	1.7	0.9	L	1.2	1.2	na	na	na	na	na	na	na	na		
RDQ Economics	0.1	L	3.3	H	0.2	0.2	H	0.1	0.1	0.3	0.4	1.1	2.1	2.8	3.4	4.1	3.1	3.6	101.9	5.0	2.9	2.8	2.9	2.9	na	na	na	na	na	na	na	na		
Regions Financial Corporation	0.1	L	3.3	H	0.2	0.2	H	0.1	0.1	0.2	0.3	0.9	1.4	2.1	2.8	3.6	2.4	3.0	103.1	5.8	2.7	2.1	2.3	2.3	na	na	na	na	na	na	na	na		
S&P Global	0.1	L	3.3	H	0.2	na	0.2	H	0.2	0.2	0.3	1.2	2.1	2.9	na	na	na	3.5	na	1.6	L	1.0	L	1.6	1.4	na	na	na	na	na	na	na		
Scotiabank Group	0.1	L	3.3	H	na	na	0.1	na	na	0.7	1.4	2.2	H	2.5	na	na	na	na	na	3.3	4.3	2.1	2.3	2.3	na	na	na	na	na	na	na	na		
Societe Generale	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.1	L	0.3	1.1	1.6	2.3	na	na	1.1	L	2.9	2.1	2.4	2.1	2.1	na	na	na	na	na	na	na	na		
Swiss Re	0.1	L	3.3	H	0.5	H	0.2	H	0.0	L	0.1	0.3	0.5	1.2	1.9	2.6	3.2	3.9	105.9	3.7	3.5	1.7	1.6	1.6	na	na	na	na	na	na	na	na		
The Northern Trust Company	0.1	L	3.3	H	0.3	0.1	L	0.1	0.2	0.2	0.4	1.2	1.8	2.6	3.2	4.0	3.2	H	3.5	102.0	3.7	2.1	2.3	2.0	2.0	na	na	na	na	na	na	na		
Thru the Cycle	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.1	L	0.2	L	0.8	1.7	2.3	3.0	3.5	2.8	107.8	H	3.4	2.7	2.6	2.5	na	na	na	na	na	na	na	na	
TS Lombard	0.1	L	3.2	L	0.4	0.2	H	0.2	H	0.2	0.5	H	0.8	1.5	2.2	H	2.9	3.7	H	100.0	L	3.5	1.8	1.8	1.8	na	na	na	na	na	na	na	na	
Via Nova Investment Mgt.	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.1	L	0.2	L	0.8	1.4	2.1	2.9	3.4	2.4	105.0	3.5	2.0	2.0	1.9	1.9	na	na	na	na	na	na	na		
Wells Fargo	0.1	L	3.3	H	0.2	0.1	L	0.1	0.1	0.2	0.3	1.1	2.1	2.4	3.4	4.3	3.2	H	3.5	na	5.8	2.3	2.2	2.3	2.3	na	na	na	na	na	na	na		
<b>August Consensus</b>	<b>0.1</b>	<b>3.3</b>	<b>0.2</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	<b>0.2</b>	<b>0.4</b>	<b>1.1</b>	<b>1.8</b>	<b>2.4</b>	<b>3.1</b>	<b>3.9</b>	<b>2.6</b>	<b>3.3</b>	<b>104.0</b>	<b>4.0</b>	<b>2.4</b>	<b>2.2</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>		
Top 10 Avg.	0.1	3.3	0.3	0.2	0.1	0.2	0.3	0.6	1.4	2.1	2.8	3.4	4.3	3.0	3.7	105.8	5.4	3.4	3.1	2.9	2.9	2.9	2.9	2.9	na	na	na	na	na	na	na	na		
Bottom 10 Avg.	0.1	3.3	0.2	0.1	0.1	0.1	0.1	0.3	0.8	1.4	2.0	2.7	3.6	2.1	2.9	102.3	2.9	1.5	1.5	1.4	1.4	1.4	1.4	1.4	na	na	na	na	na	na	na	na	na	
July Consensus	0.1	3.3	0.2	0.1	0.1	0.1	0.2	0.4	1.2	1.9	2.6	3.2	4.1	2.7	3.4	102.8	3.8	2.3	2.3	2.1	2.1	2.1	2.1	2.1	na	na	na	na	na	na	na	na	na	
Number of Forecasts Changed From A Month Ago:																																		
Down	0	1	2	0	2	3	4	7	18	21	24	17	16	10	17	1	8	10	12	10	10	10	10	10	na	na	na	na	na	na	na	na	na	
Same	41	35	29	23	31	30	27	27	18	19																								



# Third Quarter 2022

## Interest Rate Forecasts

## Key Assumptions

Blue Chip Financial Forecasts Panel Members	Percent Per Annum -- Average For Quarter															Avg. For --Qtr-- Fed's Adv Fgn Econ \$ Index	(Q-Q % Change)																	
	Short-Term					Intermediate-Term					Long-Term						(SAAR)																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		A.	B.	C.	D.	E.													
	Federal Funds Rate	Prime Bank Rate	LIBOR Rate 3-Mo.	Com. Paper 1-Mo.	Treas. Bills 3-Mo.	Treas. Bills 6-Mo.	Treas. Bills 1-Yr.	Treas. Notes 2-Yr.	Treas. Notes 5-Yr.	Treas. Notes 10-Yr.	Treas. Bond 30-Yr.	Aaa Corp. Bond	Baa Corp. Bond	State & Local Bonds	Home Mtg. Rate		Fed's Adv Fgn Econ \$ Index	Real GDP	Price Index	Price Index	Price Index													
Amherst Pierpont Securities	0.4	H	3.6	H	0.8	H	0.5	H	0.6	H	0.7	H	0.9	H	1.0	2.0	H	2.6	H	3.5	H	4.2	H	4.9	3.3	4.4	108.0	3.5	2.7	2.8	2.5			
BBVA USA	0.2		3.3		0.3		0.2		0.2		0.3		0.3		0.3	0.3		0.6		1.4		2.2		2.9	3.5	4.0	2.3	3.6	103.5	4.4	2.2	2.2	2.0	
GLC Financial Economics	0.2		3.3		0.4		0.2		0.2		0.3		0.5		0.5	1.2		1.2	L	2.2		3.4		4.3	2.8	3.7	102.7	5.0	H	2.8	2.8	2.6		
MacroFin Analytics & Rutgers Bus School	0.2		3.3		0.2		0.1	L	0.2		0.2		0.2		0.4	0.9		1.4		2.1		2.9		3.4	2.7	3.0	106.5	2.5	2.0	2.0	2.1			
Naroff Economic Advisors	0.2		3.4		0.4		0.3		0.4		0.4		0.6		1.2	2.2		3.0		3.4		5.2	H	3.4	4.0	4.0	106.0	2.1	2.5	2.5	2.5			
Regions Financial Corporation	0.2		3.3		0.3		0.2		0.2		0.3		0.4		1.1	1.6		2.2		3.0		3.8		3.8	2.6	3.2	103.2	3.0	2.0	1.9	2.0			
ACIMA Private Wealth	0.1	L	3.3		0.2		0.1	L	0.0	L	0.0	L	0.1	L	0.1	L	0.4	L	1.2	L	1.7	L	2.8	3.7	1.4	2.5	98.0	L	2.5	1.3	1.8	1.2		
Action Economics	0.1	L	3.3		0.2		0.1	L	0.1		0.2		0.3		0.6	1.3		1.9		2.5		3.1		4.0	2.9	3.5	103.1	na	na	na	na			
AIG	0.1	L	3.3		0.3		na		0.1		0.1		0.2		0.5	1.2		1.9		2.6		na		3.9	na	3.6	na	3.0	2.1	2.3	1.9			
Bank of America	0.1	L	na		na		na		na		na		na		na	na		na		na		na		na	na	na	na	4.0	3.4	2.6	2.3			
Barclays	0.1	L	3.3		na		na		na		na		na		na	na		na		na		na		na	na	na	na	1.0	L	2.1	2.1	1.8		
BMO Capital Markets	0.1	L	3.3		0.1	L	na		0.1		0.2		0.5		1.2	1.8		2.4		na		na		na	na	3.2	101.9	2.6	2.1	2.5	2.3			
BNP Paribas Americas	0.1	L	na		na		na		na		na		0.9		na	2.2		2.6		na		na		na	na	na	na	3.5	na	3.9	H	3.1		
Chan Economics	0.1	L	3.3		0.3		0.2		0.2		0.2		0.3		0.3	0.8		1.4		2.0		2.7		3.5	2.2	2.9	102.5	2.8	2.2	2.3	2.2			
Chmura Economics & Analytics	0.1	L	3.3		0.3		0.2		0.1		0.2		0.3		0.9	1.6		2.2		2.8		na		na	3.2	3.2	na	3.4	2.3	2.4	na	na		
Comerica Bank	0.1	L	3.2	L	0.3		na		0.1		0.2		0.3		0.5	1.0		1.7		2.2		na		na	3.0	3.0	na	3.5	2.0	2.3	2.3	2.3		
Daiwa Capital Markets America	0.1	L	3.3		0.3		0.1	L	0.1		0.1	L	0.4		1.1	1.8		2.4		3.3		3.9		na	3.4	3.4	107.0	3.4	2.9	3.1	2.9			
DePrince & Assoc.	0.1	L	3.3		0.2		0.3		0.2		0.2		0.5		1.2	1.8		2.4		3.4		4.6		3.0	3.5	3.5	104.6	2.6	2.5	2.5	2.4			
Economist Intelligence Unit	0.1	L	3.3		na		0.1	L	0.1		0.2		0.4		1.3	1.9		2.5		na		na		na	3.4	3.4	na	1.9	na	1.9	na	na		
Fannie Mae	0.1	L	3.3		na		na		0.2		0.3		0.4		0.6	1.1		1.5		2.0		na		na	3.1	3.1	na	2.4	3.0	2.7	2.5			
Georgia State University	0.1	L	3.3		na		na		0.1		0.2		0.3		0.6	1.4		2.2		2.8		2.9		4.6	3.9	3.9	na	3.9	2.3	2.4	2.4			
Goldman Sachs & Co.	0.1	L	na		0.2		na		0.2		na		na		na	2.1		na		na		na		na	na	na	na	2.0	2.1	2.1	1.9			
Grant Thornton/Diane Swonk	0.1	L	3.3		0.2		0.1	L	0.1		0.1	L	0.4		1.4	2.3		2.9		3.8		4.3		na	3.9	3.9	na	2.5	1.4	1.5	1.2			
IHS Markit	0.1	L	3.3		0.3		na		0.1		0.1		0.5		1.2	1.9		2.6		na		na		na	3.6	3.6	na	2.4	2.0	2.0	2.0			
J.P. Morgan Chase	0.1	L	na		na		na		na		na		na		na	na		na		na		na		na	na	na	na	2.5	2.1	2.3	2.0			
Loomis, Sayles & Company	0.1	L	3.3		0.2		0.1	L	0.1		0.1		0.2		0.6	1.5		2.1		2.6		3.3		4.0	3.1	3.6	105.1	2.0	2.2	2.2	2.0			
Moody's Analytics	0.1	L	3.3		0.4		0.1	L	0.2		0.4		0.7		1.1	1.8		2.3		3.3		3.9		4.9	3.3	4.2	na	1.9	2.3	2.3	2.3			
NatWest Markets	0.1	L	3.3		0.3		0.2		0.1	L	0.2		0.3		0.1	L	1.7		2.1		2.4		1.7	L	2.7	L	0.8	L	1.8	L	4.1	H		
Nomura Securities, Inc.	0.1	L	3.3		na		na		na		na		0.4		1.2	1.7		na		na		na		na	na	na	na	na	2.3	5.1	H	1.9	1.8	
Oxford Economics	0.1	L	3.3		0.3		na		0.2		0.2		0.3		0.3	1.3		2.3		2.9		2.7		na	3.5	3.5	102.9	2.7	1.9	2.4	2.2			
PNC Financial Services Corp.	0.1	L	3.3		0.3		na		0.1		0.2		0.2		0.3	1.1		1.9		2.7		na		4.2	2.3	3.6	106.2	3.3	2.4	2.1	2.2			
RDQ Economics	0.1	L	3.3		0.2		0.2		0.2		0.3		0.4		0.5	1.3		2.6	H	3.2		3.8		4.6	3.5	4.1	100.6	3.7	3.0	3.1	3.0			
S&P Global	0.1	L	3.3		0.3		na		0.2		0.2		0.3		0.4	1.4		2.4		3.0		na		na	3.9	3.9	na	3.2	2.2	2.4	2.5			
Scotiabank Group	0.1	L	3.3		na		na		0.1		na		na		1.2	H	1.6		2.3		2.6		na	na	na	na	na	1.5	5.0	3.5	2.5			
Societe Generale	0.1	L	3.3		0.2		0.1	L	0.1		0.1	L	0.4		1.3	1.7		2.4		na		na		1.2	3.3	3.3	na	2.1	2.1	2.5	2.2			
Swiss Re	0.1	L	3.3		0.7		0.2		0.0	L	0.2		0.3		0.6	1.3		1.8		2.5		3.4		4.2	na	3.7	105.2	1.2	0.8	L	0.9	L	1.0	L
The Northern Trust Company	0.1	L	3.3		0.3		0.1	L	0.1		0.3		0.4		0.6	1.4		2.0		2.8		3.5		4.4	3.6	H	3.8	100.5	2.8	2.2	2.2	2.2		
Thru the Cycle	0.1	L	3.3		0.2		0.1	L	0.1		0.1		0.2		0.5	1.2		1.9		2.4		3.2		3.7	2.9	3.4	108.4	H	2.3	1.9	3.0	2.5		
TS Lombard	0.1	L	3.2	L	0.4		0.2		0.3		0.3		0.7		1.2	H	1.9		2.6	H	3.3		4.1	4.9	3.2	4.6	H	100.0	2.8	2.3	2.3	2.3		
Via Nova Investment Mgt.	0.1	L	3.3		0.2		0.1	L	0.1		0.1	L	0.2		0.8	1.5		2.1		3.0		3.5		2.5	3.0	3.0	105.0	3.0	2.1	2.0	2.0			
Wells Fargo	0.1	L	3.3		0.2		0.1	L	0.1		0.1		0.2		0.5	1.4		2.2		2.6		3.5		4.4	3.3	3.8	na	2.6	2.0	2.4	2.3			
<b>August Consensus</b>	<b>0.1</b>	<b>3.3</b>	<b>0.3</b>	<b>0.2</b>	<b>0.2</b>	<b>0.2</b>	<b>0.3</b>	<b>0.5</b>	<b>1.3</b>	<b>1.9</b>	<b>2.6</b>	<b>3.3</b>	<b>4.1</b>	<b>2.7</b>	<b>3.5</b>		<b>103.9</b>		<b>2.7</b>		<b>2.3</b>		<b>2.4</b>		<b>2.2</b>		<b>2.7</b>	<b>2.3</b>	<b>2.4</b>	<b>2.2</b>				
Top 10 Avg.	0.2	3.3	0.4	0.3	0.3	0.4	0.5	0.8	1.6	2.4	3.1	3.7	4.7	3.3	4.1		106.2		3.8		3.3		3.0		2.8		3.8	3.3	3.0	2.8				
Bottom 10 Avg.	0.1	3.3	0.2	0.1	0.1	0.1	0.2	0.3	0.9	1.5	2.1	2.8	3.6	2.1	2.9		101.5		1.8		1.7		1.8		1.7		1.8	1.7	1.8	1.7				
July Consensus	0.1	3.3	0.3	0.2	0.2	0.2	0.3	0.5	1.3	2.1	2.7	3.4	4.2	2.8	3.6		102.7		2.7		2.3		2.4		2.3		2.7	2.3	2.4	2.3				
Number of Forecasts Changed From A Month Ago:																																		
Down	0	0	2	1	2	3	4	3	11	18	19	12	10	7	13		3		8		8		8		8		8	8	8	8				
Same	41	35	27	21	31	29	27	27	22	18	16	12	12	12	15		5		22		17		19		22		22	17	19	22				
Up	0	2	3	3	2	1	3	7	3	2	1	1	3	2	6		13		10		12		13		8		10	12	13	8				
Diffusion Index	50%	53%	52%	54%	50%	47%	49%	55%	39%	29%	25%	28%	36%	38%	40%		74%		53%		55%		56%		50%		53%	55%	56%	50%				

# Fourth Quarter 2022

## Interest Rate Forecasts

## Key Assumptions

Blue Chip Financial Forecasts Panel Members	Percent Per Annum -- Average For Quarter															Avg. For --Qtr.-- A.	----- (Q-Q % Change) ----- ----- (SAAR) -----																					
	-----Short-Term-----					-----Intermediate-Term-----					-----Long-Term-----						Fed's Adv Fgn Econ \$ Index	B. Real GDP	C. GDP Price Index	D. Cons. Price Index	E. PCE Price Index																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15																							
	Federal Funds Rate	Prime Bank Rate	LIBOR 3-Mo. Rate	Com. 1-Mo. Paper	Treas. 3-Mo. Bills	Treas. 6-Mo. Bills	Treas. 1-Yr. Bills	Treas. 2-Yr. Notes	Treas. 5-Yr. Notes	Treas. 10-Yr. Notes	Treas. 30-Yr. Bond	Aaa Corp. Bond	Baa Corp. Bond	State & Local Bonds	Home Mtg. Rate																							
Amherst Pierpont Securities	0.7	H	3.8	H	1.0	H	0.8	H	0.9	H	1.0	H	1.1	H	1.3	H	2.2	H	2.8	H	3.6	H	4.4	H	5.1	H	3.5	H	4.6	H	108.5	3.3	2.7	2.8	2.5			
Naroff Economic Advisors	0.4		3.5		0.5		0.4		0.5		0.6		0.6		0.7		1.4		2.3		3.2		3.6		5.3	H	3.6		4.2		107.0	1.8	2.4	2.3	2.3			
GLC Financial Economics	0.3		3.5		0.6		0.3		0.3		0.5		0.5		0.6		1.3		1.5		2.5		3.5		4.5		2.8		3.7		103.1	5.0	H	2.4	2.4	2.3		
BBVA USA	0.2		3.3	L	0.4		0.3		0.3		0.3		0.4		0.6		1.5		2.3		3.0		3.5		4.1		2.3		3.6		103.3	4.1	2.2	2.2	2.0			
Chmura Economics & Analytics	0.2		3.3	L	0.4		0.2		0.2		0.2		0.3		0.4		1.0		1.7		2.3		2.9		na		na		3.3		na	3.0	2.0	2.3	na			
Comerica Bank	0.2		3.3	L	0.3		na		0.1		0.2		0.3		0.5		1.1		1.7		2.2		na		na		na		3.1		na	2.3	2.0	2.3	2.2			
Daiwa Capital Markets America	0.2		3.3	L	0.3		0.2		0.2		0.2		0.2		0.5		1.3		2.0		2.6		3.5		4.2		na		3.7		107.0	3.0	2.7	3.0	H	2.8		
DePrince & Assoc.	0.2		3.4		0.4		0.4		0.3		0.3		0.6		1.3		2.0		2.5		3.6		3.6		5.3	H	3.4		3.7		104.5	2.4	2.4	2.5	2.4			
MacroFin Analytics & Rutgers Bus School	0.2		3.3	L	0.2		0.1	L	0.2		0.2		0.2		0.4		0.9		1.5		2.1		2.9		3.4		2.7		3.1		106.7	2.1	2.0	2.0	2.0			
Regions Financial Corporation	0.2		3.3	L	0.3		0.3		0.2		0.3		0.3		0.5		1.2		1.7		2.4		3.1		3.9		2.7		3.3		103.5	2.3	2.1	2.0	2.1			
ACIMA Private Wealth	0.1	L	3.3	L	0.2		0.1	L	0.0	L	0.0	L	0.1	L	0.1	L	0.4	L	1.2	L	1.7	L	2.8		3.7		1.4		2.5		97.0	L	1.5	0.9	L	1.9	1.1	L
Action Economics	0.1	L	3.3	L	0.2		0.1	L	0.2		0.3		0.3		0.7		1.3		1.9		2.5		3.1		4.0		2.9		3.5		102.9	na	na	na	na			
AIG	0.1	L	3.3	L	0.3		na		0.1		0.1		0.2		0.6		1.3		2.0		2.6		na		4.0		na		3.6		na	2.5	2.0	1.6	1.8			
Bank of America	0.1	L	na		na		na		na		na		na		na		na		na		na		na		na		na		na		na	2.0	3.5	2.7	2.4			
Barclays	0.1	L	3.3	L	na		na		na		na		na		na		na		na		na		na		na		na		na		na	1.0	L	2.4	2.5	2.2		
BMO Capital Markets	0.1	L	3.3	L	0.1	L	na		0.1		0.1		0.3		0.7		1.3		2.0		2.5		na		na		na		3.4		101.4	2.3	2.1	2.5	2.2			
BNP Paribas Americas	0.1	L	na		na		na		na		na		1.0		na		2.2		2.6		na		na		na		na		na		na	3.5	na	1.8	2.0			
Chan Economics	0.1	L	3.3	L	0.3		0.2		0.2		0.2		0.3		0.3		0.8		1.4		2.0		2.7		3.5		2.2		2.9		102.4	2.3	2.1	2.2	2.1			
Economist Intelligence Unit	0.1	L	3.3	L	na		0.1	L	0.1		0.2		0.2		0.5		1.5		2.0		2.5		na		na		na		3.5		na	1.5	na	1.9	na			
Fannie Mae	0.1	L	3.3	L	na		na		0.3		0.3		0.4		0.6		1.2		1.5		2.0		na		na		na		3.2		na	2.1	3.0	2.7	2.5			
Georgia State University	0.1	L	3.3	L	na		na		0.1		0.2		0.3		0.6		1.5		2.3		2.9		2.9		4.5		na		3.9		na	3.1	2.7	2.5	2.4			
Goldman Sachs & Co.	0.1	L	na		0.3		na		0.2		na		na		na		na		2.1		na		na		na		na		na		na	1.5	2.3	2.0	2.0			
Grant Thornton/Diane Swonk	0.1	L	3.3	L	0.2		0.1	L	0.1		0.1		0.2		0.5		1.3		2.2		2.8		3.7		4.2		na		3.8		na	1.8	1.4	1.3	1.1	L		
IHS Markit	0.1	L	3.3	L	0.3		na		0.1		0.1		0.2		0.6		1.3		2.0		2.6		na		na		na		3.7		na	2.2	2.1	2.0	2.0			
J.P. Morgan Chase	0.1	L	na		na		na		na		na		na		na		na		na		na		na		na		na		na		na	2.3	2.1	2.3	2.0			
Loomis, Sayles & Company	0.1	L	3.3	L	0.2		0.1	L	0.1		0.1		0.3		0.6		1.5		2.2		2.6		3.4		4.1		3.2		3.7		105.1	2.0	2.3	2.2	2.0			
Moody's Analytics	0.1	L	3.3	L	0.4		0.1	L	0.3		0.4		0.8		1.1		1.9		2.4		3.4		3.9		5.0		3.4		4.2		na	1.7	2.2	2.3	2.4			
NatWest Markets	0.1	L	3.3	L	0.3		0.2		0.1		0.2		0.3		1.3	H	1.9		2.2		2.5		1.7	L	2.7	L	0.8	L	1.8	L	na	2.0	1.7	2.2	1.9			
Nomura Securities, Inc.	0.1	L	3.3	L	na		na		na		na		na		0.5		1.3		1.7		na		na		na		na		na		na	1.3	5.3	H	2.7	2.2		
Oxford Economics	0.1	L	3.3	L	0.3		na		0.2		0.2		0.3		0.4		1.4		2.4		3.0		2.8		na		na		3.6		102.6	1.4	2.6	3.0	H	2.7		
PNC Financial Services Corp.	0.1	L	3.3	L	0.3		na		0.2		0.2		0.3		0.4		1.1		1.9		2.7		na		4.2		2.3		3.6		106.5	3.0	2.7	2.4	2.5			
RDQ Economics	0.1	L	3.3	L	0.2		0.2		0.2		0.3		0.4		0.5		1.4		2.7		3.3		3.9		4.7		3.6		4.2		99.4	3.7	3.0	3.0	H	3.0	H	
S&P Global	0.1	L	3.3	L	0.3		na		0.2		0.2		0.3		0.4		1.5		2.5		3.0		na		na		na		4.0		na	1.8	2.7	2.6	2.6			
Scotiabank Group	0.1	L	3.3	L	na		na		0.2		na		na		1.3	H	1.8		2.3		2.6		na		na		na		na		na	1.4	1.0	-2.0	L	2.5		
Societe Generale	0.1	L	3.3	L	0.2		0.1	L	0.1		0.1	L	0.5		1.4		1.8		1.8		2.4		na		na		1.3		3.3		na	1.9	2.2	2.7	2.3			
Swiss Re	0.1	L	3.3	L	0.6		0.2		0.0	L	0.2		0.3		0.5		1.1		1.6		2.3		3.2		4.0		na		3.5		104.8	1.0	L	0.9	L	1.3	1.3	
The Northern Trust Company	0.1	L	3.3	L	0.3		0.1	L	0.1		0.3		0.5		0.6		1.5		2.1		2.8		3.6		4.5		3.8	H	3.9		100.0	2.7	2.1	2.1	2.1			
Thru the Cycle	0.1	L	3.3	L	0.2		0.1	L	0.1		0.1		0.3		0.6		1.3		1.9		2.4		3.2		3.9		2.9		3.5		109.4	H	1.8	2.2	2.7	2.6		
Via Nova Investment Mgt.	0.1	L	3.3	L	0.2		0.1	L	0.1		0.1	L	0.3		0.9		1.6		2.2		2.2		3.1		3.6		2.6		3.1		105.0	2.5	2.2	2.2	2.1			
Wells Fargo	0.1	L	3.3	L	0.2		0.1	L	0.1		0.1		0.3		0.6		1.5		2.3		2.7		3.6		4.5		3.4		3.9		na	2.2	2.1	2.8	2.3			
<b>August Consensus</b>	<b>0.1</b>	<b>3.3</b>	<b>0.3</b>	<b>0.2</b>	<b>0.2</b>	<b>0.2</b>	<b>0.3</b>	<b>0.6</b>	<b>1.3</b>	<b>2.0</b>	<b>2.6</b>	<b>3.3</b>	<b>4.2</b>	<b>2.7</b>	<b>3.5</b>														<b>104.0</b>	<b>2.3</b>	<b>2.3</b>	<b>2.2</b>	<b>2.2</b>					
Top 10 Avg.	0.3	3.4	0.5	0.3	0.4	0.4	0.5	0.9	1.7	2.4	3.1	3.7	4.8	3.4	4.0															106.5	3.4	3.1	2.8	2.6				
Bottom 10 Avg.	0.1	3.3	0.2	0.1	0.1	0.1	0.2	0.4	1.0	1.5	2.2	2.8	3.7	2.1	3.0															101.6	1.4	1.6	1.4	1.7				
July Consensus	0.1	3.3	0.3	0.2	0.2	0.3	0.3	0.6	1.4	2.1	2.7	3.4	4.3	2.8	3.6															102.9	2.3	2.3	2.2	2.2				
Number of Forecasts Changed From A Month Ago:																																						
Down	1	0	5	3	4	5	5	5	10	16	17	11	10	6	14														3	10	6	7	8					
Same	39	34	25	19	28	27	24	22	19	18	17	12	14	11	13														4	19	21	22	19					
Up	0	2	1	2	2	0	4	9	6	3	1	1	0	3	6														13	10	9	10	10					
Diffusion Index	49%	53%	44%	48%	47%	42%	48%	56%	44%	32%	27%	29%	29%	43%	38%														75%	50%	54%	54%	53%					

**International Interest Rate And Foreign Exchange Rate Forecasts**

Blue Chip Forecasters	Fed Fund Target Rate		
	In 3 Mo.	In 6 Mo.	In 12 Mo.
Barclays	0.13	0.13	--
BMO Capital Markets	0.13	0.13	0.13
IHSMarkit	--	--	--
Moody's Analytics	0.13	0.13	0.13
Northern Trust	0.13	0.13	0.13
Oxford Economics	0.13	0.13	0.13
S&P Global	0.12	0.12	0.12
Scotiabank	0.13	0.13	0.13
TS Lombard	0.13	0.13	0.13
Wells Fargo	0.13	0.13	0.13
<b>August Consensus</b>	<b>0.13</b>	<b>0.13</b>	<b>0.13</b>
High	0.13	0.13	0.13
Low	0.12	0.12	0.12
Last Months Avg.	0.13	0.13	0.13

United States			
10 Yr. Gov't Bond Yield %			
In 3 Mo.	In 6 Mo.	In 12 Mo.	
1.65	1.70	--	
1.35	1.50	1.80	
1.55	1.68	1.91	
1.72	1.92	2.29	
1.50	1.65	1.95	
1.97	2.11	2.35	
1.80	2.02	2.26	
2.00	2.15	2.25	
1.70	2.00	2.40	
1.50	1.75	2.00	
<b>1.67</b>	<b>1.85</b>	<b>2.13</b>	
2.00	2.15	2.40	
1.35	1.50	1.80	
1.75	1.92	2.16	

Fed's AFE \$ Index			
In 3 Mo.	In 6 Mo.	In 12 Mo.	
--	--	--	
103.5	103.0	102.0	
--	--	--	
--	--	--	
105.0	103.0	101.0	
103.8	103.6	102.9	
--	--	--	
--	--	--	
108.0	105.0	104.0	
--	--	--	
<b>105.1</b>	<b>103.7</b>	<b>102.5</b>	
108.0	105.0	104.0	
103.5	103.0	101.0	
103.2	101.7	101.6	

Blue Chip Forecasters	Policy-Rate Balance Rate		
	In 3 Mo.	In 6 Mo.	In 12 Mo.
Barclays	-0.10	-0.10	--
BMO Capital Markets	-0.10	-0.10	-0.10
IHSMarkit	--	--	--
Moody's Analytics	-0.10	-0.10	-0.10
Nomura Securities	--	--	--
Northern Trust	-0.10	-0.10	-0.10
Oxford Economics	-0.05	-0.05	-0.05
S&P Global	-0.10	-0.10	-0.10
Scotiabank	-0.10	-0.10	-0.10
TS Lombard	-0.06	-0.06	-0.06
Wells Fargo	-0.10	-0.10	-0.10
<b>August Consensus</b>	<b>-0.09</b>	<b>-0.09</b>	<b>-0.09</b>
High	-0.05	-0.05	-0.05
Low	-0.10	-0.10	-0.10
Last Months Avg.	-0.09	-0.09	-0.09

Japan			
10 Yr. Gov't Bond Yield %			
In 3 Mo.	In 6 Mo.	In 12 Mo.	
0.10	0.15	--	
0.10	0.10	0.10	
--	--	--	
0.07	0.07	0.05	
--	--	--	
0.05	0.10	0.10	
0.02	0.00	0.00	
0.02	-0.01	-0.04	
--	--	--	
0.10	0.10	0.10	
0.10	0.15	0.15	
<b>0.07</b>	<b>0.08</b>	<b>0.07</b>	
0.10	0.15	0.15	
0.02	-0.01	-0.04	
0.08	0.07	0.07	

Yen per US\$			
In 3 Mo.	In 6 Mo.	In 12 Mo.	
111.0	112.0	--	
110.0	110.0	109.0	
110.1	109.8	108.8	
108.0	107.0	105.1	
112.0	113.0	115.0	
109.0	108.0	108.0	
110.0	110.0	109.4	
108.5	108.0	107.5	
107.0	108.0	110.0	
106.0	103.0	100.0	
--	--	--	
<b>109.2</b>	<b>108.9</b>	<b>108.1</b>	
112.0	113.0	115.0	
106.0	103.0	100.0	
108.8	108.2	107.7	

Blue Chip Forecasters	Official Bank Rate		
	In 3 Mo.	In 6 Mo.	In 12 Mo.
Barclays	0.10	0.10	--
BMO Capital Markets	0.10	0.10	0.10
IHSMarkit	--	--	--
Moody's Analytics	0.10	0.10	0.15
Nomura Securities	--	--	--
Northern Trust	0.10	0.10	0.10
Oxford Economics	0.10	0.10	0.10
S&P Global	0.10	0.10	0.10
Scotiabank	0.10	0.10	0.10
TS Lombard	0.10	0.10	0.10
Wells Fargo	0.10	0.10	0.10
<b>August Consensus</b>	<b>0.10</b>	<b>0.10</b>	<b>0.11</b>
High	0.10	0.10	0.15
Low	0.10	0.10	0.10
Last Months Avg.	0.10	0.10	0.10

United Kingdom			
10 Yr. Gilt Yields %			
In 3 Mo.	In 6 Mo.	In 12 Mo.	
0.85	1.00	--	
0.60	0.65	1.10	
--	--	--	
1.01	1.17	1.51	
--	--	--	
0.70	0.85	1.00	
0.86	0.92	1.12	
0.89	0.94	1.04	
--	--	--	
1.00	1.30	1.70	
1.05	1.15	1.30	
<b>0.87</b>	<b>1.00</b>	<b>1.25</b>	
1.05	1.30	1.70	
0.60	0.65	1.00	
0.93	1.04	1.23	

US\$ per Pound Sterling			
In 3 Mo.	In 6 Mo.	In 12 Mo.	
1.40	1.40	--	
1.39	1.40	1.41	
1.40	1.40	1.41	
1.47	1.49	1.56	
1.51	1.52	1.56	
1.37	1.38	1.40	
1.40	1.41	1.43	
1.38	1.38	1.40	
1.38	1.40	1.42	
1.36	1.42	1.45	
--	--	--	
<b>1.41</b>	<b>1.42</b>	<b>1.45</b>	
1.51	1.52	1.56	
1.36	1.38	1.40	
1.42	1.44	1.46	

Blue Chip Forecasters	SNB Policy Rate		
	In 3 Mo.	In 6 Mo.	In 12 Mo.
Barclays	-0.75	-0.75	--
IHSMarkit	--	--	--
Moody's Analytics	-0.75	-0.75	-0.75
Nomura Securities	--	--	--
Northern Trust	-0.75	-0.75	-0.75
Oxford Economics	-0.75	-0.75	-0.75
S&P Global	-0.75	-0.75	-0.75
Scotiabank	--	--	--
TS Lombard	-0.75	-0.75	-0.75
Wells Fargo	-0.75	-0.75	-0.75
<b>August Consensus</b>	<b>-0.75</b>	<b>-0.75</b>	<b>-0.75</b>
High	-0.75	-0.75	-0.75
Low	-0.75	-0.75	-0.75
Last Months Avg.	-0.75	-0.75	-0.75

Switzerland			
10 Yr. Gov't Bond Yield %			
In 3 Mo.	In 6 Mo.	In 12 Mo.	
--	--	--	
--	--	--	
-0.20	-0.15	-0.04	
--	--	--	
-0.35	-0.25	-0.10	
-0.08	-0.03	0.06	
-0.10	-0.03	0.06	
--	--	--	
--	--	--	
--	--	--	
<b>-0.18</b>	<b>-0.12</b>	<b>-0.01</b>	
-0.08	-0.03	0.06	
-0.35	-0.25	-0.10	
-0.15	-0.09	-0.01	

CHF per US\$			
In 3 Mo.	In 6 Mo.	In 12 Mo.	
0.93	0.93	--	
0.90	0.90	0.91	
0.90	0.89	0.85	
0.92	0.91	0.90	
0.92	0.90	0.89	
0.93	0.93	0.92	
0.92	0.92	0.93	
0.92	0.92	0.94	
0.97	0.97	0.97	
--	--	--	
<b>0.92</b>	<b>0.92</b>	<b>0.91</b>	
0.97	0.97	0.97	
0.90	0.89	0.85	
0.91	0.91	0.91	

Blue Chip Forecasters	O/N MMkt Financing Rate		
	In 3 Mo.	In 6 Mo.	In 12 Mo.
Barclays	0.25	0.25	--
BMO Capital Markets	0.25	0.25	0.25
IHSMarkit	--	--	--
Moody's Analytics	0.25	0.25	0.25
Nomura Securities	--	--	--
Northern Trust	0.25	0.25	0.25
Oxford Economics	0.25	0.25	0.25
S&P Global	0.25	0.25	0.25
Scotiabank	0.25	0.25	0.50
TS Lombard	0.25	0.25	0.25
Wells Fargo	0.25	0.25	0.25
<b>August Consensus</b>	<b>0.25</b>	<b>0.25</b>	<b>0.28</b>
High	0.25	0.25	0.50
Low	0.25	0.25	0.25
Last Months Avg.	0.25	0.25	0.25

Canada			
10 Yr. Gov't Bond Yield %			
In 3 Mo.	In 6 Mo.	In 12 Mo.	
--	--	--	
1.25	1.40	1.70	
--	--	--	
1.52	1.72	2.03	
--	--	--	
1.30	1.45	1.60	
1.79	2.01	2.30	
1.65	1.97	2.08	
1.70	1.85	1.95	
1.65	1.95	2.35	
1.75	1.90	2.10	
<b>1.58</b>	<b>1.78</b>	<b>2.01</b>	
1.79	2.01	2.35	
1.25	1.40	1.60	
1.65	1.84	2.05	

C\$ per US\$			
In 3 Mo.	In 6 Mo.	In 12 Mo.	
1.22	1.21	--	
1.24	1.22	1.21	
1.23	1.24	1.20	
1.24	1.24	1.24	
1.23	1.23	1.22	
1.25	1.23	1.21	
1.24	1.25	1.26	
1.21	1.23	1.26	
1.22	1.24	1.25	
1.38	1.38	1.38	
--	--	--	
<b>1.25</b>	<b>1.25</b>	<b>1.25</b>	
1.38	1.38	1.38	
1.21	1.21	1.20	
1.24	1.24	1.24	

## International Interest Rate And Foreign Exchange Rate Forecasts

Blue Chip Forecasters	Official Cash Rate		
	In 3 Mo.	In 6 Mo.	In 12 Mo.
Barclays	0.10	0.10	--
IHSMarkit	--	--	--
Moody's Analytics	0.10	0.10	0.10
Nomura Securities	--	--	--
Northern Trust	0.10	0.10	0.10
Oxford Economics	0.05	0.08	0.10
S&P Global	0.10	0.10	0.10
Scotiabank	0.10	0.10	0.10
TS Lombard	0.25	0.25	0.25
<b>August Consensus</b>	<b>0.11</b>	<b>0.12</b>	<b>0.13</b>
High	0.25	0.25	0.25
Low	0.05	0.08	0.10
Last Months Avg.	0.11	0.11	0.12

Australia		
10 Yr. Gov't Bond Yield %		
In 3 Mo.	In 6 Mo.	In 12 Mo.
--	--	--
--	--	--
1.32	1.52	1.57
--	--	--
1.30	1.45	1.60
1.84	2.09	2.43
1.77	1.97	2.02
--	--	--
1.95	2.25	2.65
<b>1.64</b>	<b>1.86</b>	<b>2.05</b>
1.95	2.25	2.65
1.30	1.45	1.57
1.77	1.92	2.14

US\$ per A\$		
In 3 Mo.	In 6 Mo.	In 12 Mo.
0.76	0.75	--
0.74	0.74	0.73
0.78	0.75	0.75
0.80	0.81	0.82
0.74	0.76	0.78
0.75	0.74	0.74
0.78	0.78	0.78
0.78	0.76	0.75
--	--	--
<b>0.77</b>	<b>0.76</b>	<b>0.76</b>
0.80	0.81	0.82
0.74	0.74	0.73
0.77	0.78	0.77

Blue Chip Forecasters	Main Refinancing Rate		
	In 3 Mo.	In 6 Mo.	In 12 Mo.
Barclays	0.00	0.00	--
BMO Capital Markets	0.00	0.00	0.00
IHSMarkit	--	--	--
Moody's Analytics	0.00	0.00	0.00
Nomura Securities	--	--	--
Northern Trust	0.00	0.00	0.00
Oxford Economics	0.00	0.00	0.00
S&P Global	0.00	0.00	0.00
Scotiabank	0.00	0.00	0.00
TS Lombard	0.00	0.00	0.00
Wells Fargo	-0.50	-0.50	-0.50
<b>August Consensus</b>	<b>-0.06</b>	<b>-0.06</b>	<b>-0.06</b>
High	0.00	0.00	0.00
Low	-0.50	-0.50	-0.50
Last Months Avg.	-0.05	-0.05	-0.05

### Euro area

US\$ per Euro		
In 3 Mo.	In 6 Mo.	In 12 Mo.
1.18	1.18	--
1.20	1.20	1.21
1.21	1.21	1.21
1.20	1.21	1.25
1.25	1.26	1.27
1.18	1.20	1.23
1.20	1.21	1.22
1.21	1.21	1.21
1.18	1.17	1.15
1.20	1.25	1.28
--	--	--
<b>1.20</b>	<b>1.21</b>	<b>1.23</b>
1.25	1.26	1.28
1.18	1.17	1.15
1.21	1.22	1.24

Blue Chip Forecasters	10 Yr. Gov't Bond Yields %											
	Germany			France			Italy			Spain		
	In 3 Mo.	In 6 Mo.	In 12 Mo.	In 3 Mo.	In 6 Mo.	In 12 Mo.	In 3 Mo.	In 6 Mo.	In 12 Mo.	In 3 Mo.	In 6 Mo.	In 12 Mo.
Barclays	-0.20	-0.10	--	--	--	--	--	--	--	--	--	--
BMO Capital Markets	-0.40	-0.35	-0.10	--	--	--	--	--	--	--	--	--
Moody's Analytics	-0.24	-0.17	-0.01	0.02	0.08	0.24	0.95	1.02	1.13	0.40	0.43	0.54
Northern Trust	-0.30	-0.15	0.00	0.05	0.20	0.30	0.75	0.90	1.00	0.40	0.55	0.70
Oxford Economics	-0.05	0.05	0.16	0.28	0.38	0.49	1.04	1.22	1.48	0.63	0.80	1.05
S&P Global	-0.21	-0.14	-0.03	0.15	0.22	0.36	0.96	1.08	1.39	0.55	0.64	0.80
TS Lombard	0.00	0.30	0.70	-0.25	0.05	0.45	0.57	0.87	1.27	0.07	0.37	0.77
Wells Fargo	-0.05	0.00	0.15	--	--	--	--	--	--	--	--	--
<b>August Consensus</b>	<b>-0.18</b>	<b>-0.07</b>	<b>0.12</b>	<b>0.05</b>	<b>0.19</b>	<b>0.37</b>	<b>0.85</b>	<b>1.02</b>	<b>1.25</b>	<b>0.41</b>	<b>0.56</b>	<b>0.77</b>
High	0.00	0.30	0.70	0.28	0.38	0.49	1.04	1.22	1.48	0.63	0.80	1.05
Low	-0.40	-0.35	-0.10	-0.25	0.05	0.24	0.57	0.87	1.00	0.07	0.37	0.54
Last Months Avg.	-0.14	-0.04	0.10	0.11	0.24	0.38	0.89	1.03	1.23	0.44	0.60	0.77

	Consensus Forecasts			
	10-year Bond Yields vs U.S. Yield			
	Current	In 3 Mo.	In 6 Mo.	In 12 Mo.
Japan	-1.29	-1.60	-1.77	-2.07
United Kingdom	-0.64	-0.80	-0.85	-0.88
Switzerland	-1.67	-1.86	-1.96	-2.14
Canada	-0.09	-0.10	-0.07	-0.12
Australia	-0.14	-0.04	0.01	-0.08
Germany	-1.72	-1.86	-1.92	-2.01
France	-1.38	-1.62	-1.66	-1.77
Italy	-0.67	-0.82	-0.83	-0.88
Spain	-1.05	-1.26	-1.29	-1.36

	Consensus Forecasts			
	Policy Rates vs U.S. Target Rate			
	Current	In 3 Mo.	In 6 Mo.	In 12 Mo.
Japan	-0.23	-0.22	-0.04	-0.22
United Kingdom	-0.03	-0.03	-0.03	-0.02
Switzerland	-0.88	-0.88	-0.88	-0.88
Canada	0.13	0.12	0.12	0.15
Australia	-0.03	-0.01	-0.01	0.00
Euro area	-0.13	-0.18	-0.18	-0.19

## Viewpoints:

### A Sampling of Views on the Economy, Financial Markets and Government Policy Excerpted from Recent Reports Issued by our Blue Chip Panel Members and Others

#### Where is China's Economic Policy Headed?

Financial markets were focused on China's regulatory policies this week, but there are more fundamental changes afoot on the policy front. With the world's leading central banks setting the stage for eventual tightening, China looks to be bucking the trend. This was highlighted by the People's Bank of China's (PBoC) unexpected cut of the reserve requirement ratio (RRR)—a key monetary policy tool—for all banks by 50 bps on July 9. In our view, such a decision isn't surprising when one digs a little deeper into the Middle Kingdom's current economic situation.

Moreover, we suspect that China's authorities may need to provide a little more fiscal and monetary stimulus in the coming quarters due to five key developments: (1) the economic recovery has been mainly driven by external demand, (2) the pandemic has intensified the divide between the stronger coastal and weaker inner provinces, (3) the country's numerous small banks remain under pressure, (4) inflationary pressures remain moderate, and (5) relatively little fiscal or monetary support was provided when the pandemic began.

#### *An Uneven Economic Recovery*

The composition of the economic recovery has become more concerning. Headline real GDP's seemingly impressive 12.7% y/y rise in H1/21 was powered by a 38.6% y/y surge in merchandise exports (U.S. dollar terms). Even when measured in terms of the two-year average growth rate to adjust for distortions caused by the low base of comparison in 2020, both results are solid (roughly 5.5% and 15%). However, domestic demand has been more subdued, which could prove problematic if global demand for goods rolls over (as demand for services revives).

Both fixed asset investment and retail sales posted relatively sluggish growth rates of around 5% and 4% in H1/21 (again on a 2-year basis). A breakdown of fixed asset investment shows that real estate development (+10%) continues to lead the way, while manufacturing (+5%) lags behind it. Notably, infrastructure spending has been soft (+2.5%).

Similar to many developed economies since the pandemic began, Chinese consumers remain keen on spending heavily on housing. This may explain why property prices have picked up steam despite tighter financing conditions. At the beginning of the year, mortgages were capped at 32.5% of a large bank's total loans with overall lending to the property sector capped at 40%. Note that the decision to restrict the flow of credit to the housing sector is multifaceted as the authorities are keen to keep housing affordable, prevent a housing bubble, and channel more funds to struggling small and medium-sized enterprises (SMEs) and the manufacturing sector. The latter is being driven by Beijing's desire to upgrade its technological capabilities to reduce its reliance on foreign suppliers, as part of its rebranded "dual-circulation" strategy.

#### *The Inter-Regional Divide Widens*

Although it's difficult to precisely quantify given the lack of comprehensive high-frequency data, there is increasing anecdotal evidence (e.g., diverging consumer spending and house price trends)

that the divide between the more-developed coastal regions versus the less-developed inner provinces (and higher-tier versus lower-tier cities) has risen during the pandemic. This divergence helps explain why some highly-leveraged property developers are encountering financial difficulties and are likely to continue making front-page news. Hightech manufacturing hubs (Guangdong, Zhejiang, Jiangsu and Shanghai), which are mainly located on the coast, have benefited from the boom in exports. In contrast, the pandemic, which has curbed tourism, has taken a toll on the inner provinces. However, there are other non-pandemic developments at work such as the long-running urbanization drive and the ongoing downsizing of largely state-owned heavy industry in the northern rust belt (e.g., Liaoning, Jilin and Heilongjiang). Furthermore, the country's decarbonization drive could begin to weigh on the inner provinces (e.g., Shanxi, Inner Mongolia, Shaanxi, Hebei, Henan) that have a heavy concentration of highpollutant industries (e.g., steel, cement, and coal). To mitigate this risk, the authorities have begun to let more non-financial state-owned enterprises fail (i.e., default on debt) in an effort to break the longstanding belief of the 'implicit government guarantee' to increase market discipline and overall financial stability.

#### *Small Banks Still in the Line of Fire*

At the same time, pressure on China's 4,000+ small city and rural banks remains intense. Their pre-pandemic struggles were highlighted by the high-profile troubles experienced by three banks in mid-2019 (Baoshang Bank, Bank of Jinzhou and HengFeng Bank). Although the authorities do not provide a comprehensive breakdown of the banking sector's total problem loans (nonperforming loans, special-mentioned loans, off-balance sheet exposures and loans benefiting from regulatory forbearance/deferred payments), the city and rural banks are facing a higher degree of pressure on asset quality. These banks are generally located outside China's major economic hubs but are also more exposed to SMEs, which historically have a high failure rate.

Another source of pressure bearing down on the smaller banks is their heavy dependence on interbank funding given limited deposit bases, which is mainly supplied by the country's four massive state-owned financial institutions. This explains why the PBoC cut the RRR for both large banks and small banks as pressure on systemwide funding has been rising and is highlighted by the aggregated bank loan/deposit ratio breaching 75% since Q4/20, which had long been considered a critical level of liquidity risk. The increase has been largely driven by sluggish growth in deposits rather than a pickup in loans.

#### *Limited Inflation Pressure*

The inflation picture does not appear overly threatening as headline CPI only recently crept back into the black, rising 1.1% y/y in June. Like the rest of the world, current pressures are being largely driven by cost-push factors, namely higher commodity prices, not demand-pull factors (i.e., higher incomes). Thus, the rapid rise in PPI for industrial products (+8.8% y/y in June) is unlikely to translate into significantly higher CPI as occurred in the last large episode when PPI surged in 2017.

One might rightly question why Beijing has become so vocal about the strength in base metal prices, which has resulted in the release of strategic state reserves of aluminum, copper and zinc. We believe Beijing's anti-inflation rhetoric and measures have more to do with preventing smaller downstream firms (i.e., SMEs) from being squeezed (as they cannot pass on higher input prices) from the country's array of wholesalers and traders who play a key role in the distribution of metals by large producers.

#### *Plenty of Policy Space Still Available*

Chinese policymakers still have plenty of firepower at their disposal, unlike many developed economies, as they refrained from easing fiscal and monetary policies significantly in their initial response to the pandemic in early 2020. The rather conservative approach to the health crisis reflects a number of factors, namely: (1) confidence that COVID-19 can be contained domestically; (2) the commitment to lowering financial stability risks; and (3) the traditional reliance on household savings/family support during times of trouble. This explains why Beijing has chosen to provide limited direct payments to the unemployed like in the West and instead has focused fiscal support (5% of 2019 GDP) to help hard-hit small SMEs. The monetary policy response has been even more restrained. Beyond the banks' average RRR cuts of 150 bps in total since end-2019, the de facto policy rate (1-year loan prime rate—the key rate that the majority of a bank's lending is linked to) has been reduced by just 30 bps.

**Key Takeaway:** Although China has been able to limit the impact of the pandemic from a human tragedy perspective, both businesses and consumers remain cautious, which is taking an economic toll. Thus, authorities may need to introduce more fiscal or monetary stimulus to help fortify the economic recovery. We think that Beijing is likely to lean more heavily on fiscal policy given ongoing concerns of excessive financial leverage.

*Art Woo (BMO Capital Markets)*

#### **Rising Expectations of Central Banks**

*Central bank mandates are starting to include socio-economic objectives.*

The story of central banks goes back to the seventeenth century with the establishment of the Swedish Riksbank, which was tasked with lending the government funds and acting as a clearing house for trade. Central bank mandates have come a long way since then, broadening to include objectives of economic and financial stability.

At present, many central banks are reworking their mandates, refining old objectives and adding new ones. The European Central Bank (ECB) is the latest one to have completed a review of its strategy, with results published last week. Some outcomes were sensible, and expected; others, a bit more aspirational.

The ECB's 19-month-long review, the first since 2003, concluded with a fundamental shift in how the central bank defines its core mandate of price stability. After years of undershooting its inflation objective, the ECB ditched its target of "close to, but below, 2%", an opaque phrase that implied a cap on price growth. Instead, it will now have a symmetric inflation target, and will tolerate a transitory

period in which price increases are moderately above target, when deemed necessary. The ECB's step is in keeping with the new approach to inflation targeting announced by the Federal Reserve last year.

The Governing Council also confirmed that the harmonized index of consumer prices (HICP) remains the appropriate price measure, but called for inclusion of owner-occupied housing (OOH) in the inflation calculations. The move will have a small impact, estimated to boost inflation by 0.2 percentage points—but when low inflation is a struggle, every bit helps.

One frontier facing monetary authorities is climate risk. Merely gaining agreement to take on the topic is no small feat. Many believe the issue is best left to legislatures to be addressed. It is a broader challenge than any central bank alone could address, and mixing environmental mandates with financial regulations could easily lead to undesired outcomes.

However, climate change can have profound implications for economic and price stability, warranting central banks' attention. The ECB announced it will adjust the allocation of its corporate bond purchases, within their mandate, to investing more in green bonds. The move could attract further political criticism, as allocating capital from countries to corporates will likely raise more eyebrows. Unfortunately, corporate bonds account for only a portion (less than 10%) of the ECB's net asset purchases, which are heavily concentrated in sovereign debt. Moreover, small changes in funding costs are not the most efficient way to meet emissions goals. Fiscal and structural policies will be needed to address this issue.

And if that weren't enough, monetary authorities are considering what they can do to address the unequal distribution of income. While the ECB didn't focus on inequality in its strategy review, it has been pushing for deeper analysis on the subject. In the eurozone, monetary easing has not only led to a substantial reduction in the unemployment rate, but also reduced inequality by helping lower-skilled workers find employment and boost incomes of poorer households.

Some studies have shown that easy monetary policy tends to increase inequality. Lower interest rates and quantitative easing lead to increased asset prices, benefitting those at the top of the income pyramid; the gains to lower earners are limited. However, in a recent report, the Bank for International Settlements concluded that "inequality is largely the result of long-term structural forces that are independent of monetary policy."

Central banks cannot fix climate change and inequality alone, as they lack the mandates and tools to target these challenges. Fiscal policies, along with structural reforms, will hold the key in addressing these pervasive challenges. However, central banks can certainly provide support with virtuous prudential regulations and by focusing on their core policy objectives.

The ECB is hoping that setting a more sensible inflation target will bolster its credibility. But broadening its horizons to address social issues may expose it to legal and political resistance.

*Vaibhav Tandon (Northern Trust Economic Research)*



## Special Questions:

1. When do you think the Fed will raise the Federal Funds rate?

<u>by the end 2021</u>	<u>by the end Jun 2022</u>	<u>by the end 2022</u>	<u>by the end Jun 2023</u>	<u>by the end 2023</u>	<u>by the end 2024</u>	<u>Later</u>
0%	9%	27%	39%	24%	0%	0%

2. a. When will the US Fed begin to taper its Treasury security purchases?

<u>by the end 2021</u>	<u>by the end Jun 2022</u>	<u>by the end 2022</u>	<u>by the end Jun 2023</u>	<u>by the end 2023</u>	<u>Later</u>
26%	65%	10%	0%	0%	0%

b. When will the US Fed begin to taper its MBS purchases?

<u>by the end 2021</u>	<u>by the end Jun 2022</u>	<u>by the end 2022</u>	<u>by the end Jun 2023</u>	<u>by the end 2023</u>	<u>Later</u>
29%	65%	3%	3%	0%	0%

3. a. What is your estimate of the US federal government deficit for:

<u>FY 2021</u>	<u>FY 2022</u>
\$3.0 tril.	\$1.5 tril.

b. Do you see the size of your deficit forecast supporting economic growth? Yes 85% No 15%

c. Do you see the size of your deficit forecast raising interest rates so that economic growth is actually squeezed? Yes 8% No 92%

d. Do you see the size of your deficit forecast putting meaningful upward pressure on inflation? Yes 50% No 50%

4. Are the inflation risks in the U.S. temporary or are they likely to linger?

<u>Temporary</u>	<u>Likely to linger</u>
44%	56%

5. Do you think financial markets are too complacent concerning the inflation outlook? Yes 64% No 36%

6. What factor would most ease your concerns about upside inflation risk?

A bigger (or swifter) than expected tightening of monetary policy	17%
A withdrawal of fiscal policy stimulus	14%
A rebound in domestic private sector capex and/or productivity	7%
A quicker-than-expected easing of global supply chain bottlenecks	62%
Another factor	0%

7. As their economies recover, will central banks be too slow in removing their monetary accommodation to avoid inflation accelerating to well above target?

	<u>Yes</u>	<u>No</u>
US Federal Reserve Bank	56%	44%
European Central Bank	40%	60%
Bank of Japan	10%	90%
Bank of England	25%	75%
Bank of Canada	20%	80%

8. What, in your view, is the biggest threat to global economic stability over the next 12 months?

Further positive inflation surprises and tighter-than-expected monetary policy	17%
Enduring international supply chain disruption	17%
A premature loosening of lockdown stringency that triggers another wave of COVID-19	10%
Premature withdrawal of fiscal policy stimulus programs	0%
An uneven global vaccination rollout and various mutations including the Delta variant	57%
Another factor	0%

## 2021 Historical Data

Monthly Indicator	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Retail and Food Service Sales (a)	7.6	-2.9	11.3	0.9	-1.7	0.6	....	....	....	....	....	....
Auto & Light Truck Sales (b)	16.78	15.92	17.62	18.30	17.02	15.39	....	....	....	....	....	....
Personal Income (a, current \$)	9.9	-7.2	21.0	-13.6	-2.2	0.1	....	....	....	....	....	....
Personal Consumption (a, current \$)	3.3	-1.1	5.2	1.1	-0.1	1.0	....	....	....	....	....	....
Consumer Credit (e)	-0.5	5.8	5.5	5.7	10.0	....	....	....	....	....	....	....
Consumer Sentiment (U. of Mich.)	79.0	76.8	84.9	88.3	82.9	85.5	81.2	....	....	....	....	....
Household Employment (c)	201	208	609	328	444	-18	....	....	....	....	....	....
Nonfarm Payroll Employment (c)	233	536	785	269	583	850	....	....	....	....	....	....
Unemployment Rate (%)	6.3	6.2	6.0	6.1	5.8	5.9	....	....	....	....	....	....
Average Hourly Earnings (All, cur. \$)	29.92	30.00	29.97	30.17	30.30	30.40	....	....	....	....	....	....
Average Workweek (All, hrs.)	35.0	34.6	34.9	34.9	34.8	34.7	....	....	....	....	....	....
Industrial Production (d)	-1.7	-4.9	1.5	17.5	16.1	9.8	....	....	....	....	....	....
Capacity Utilization (%)	75.0	72.7	74.6	74.6	75.1	75.4	....	....	....	....	....	....
ISM Manufacturing Index (g)	58.7	60.8	64.7	60.7	61.2	60.6	59.5	....	....	....	....	....
ISM Nonmanufacturing Index (g)	58.7	55.3	63.7	62.7	64.0	60.1	....	....	....	....	....	....
Housing Starts (b)	1.625	1.447	1.725	1.514	1.546	1.643	....	....	....	....	....	....
Housing Permits (b)	1.883	1.726	1.755	1.733	1.683	1.594	....	....	....	....	....	....
New Home Sales (1-family, c)	993	823	873	785	724	676	....	....	....	....	....	....
Construction Expenditures (a)	3.0	-1.1	1.0	0.3	-0.2	0.1	....	....	....	....	....	....
Consumer Price Index (nsa, d)	1.4	1.7	2.6	4.2	5.0	5.4	....	....	....	....	....	....
CPI ex. Food and Energy (nsa, d)	1.4	1.3	1.6	3.0	3.8	4.5	....	....	....	....	....	....
PCE Chain Price Index (d)	1.4	1.6	2.5	3.6	4.0	4.0	....	....	....	....	....	....
Core PCE Chain Price Index (d)	1.5	1.5	2.0	3.1	3.4	3.5	....	....	....	....	....	....
Producer Price Index (nsa, d)	1.6	3.0	4.2	6.2	6.6	7.3	....	....	....	....	....	....
Durable Goods Orders (a)	2.4	1.3	1.3	-0.7	3.2	0.8	....	....	....	....	....	....
Leading Economic Indicators (a)	0.5	0.0	1.4	1.3	1.2	0.7	....	....	....	....	....	....
Balance of Trade & Services (f)	-67.1	-70.6	-75.0	-69.1	-71.2	....	....	....	....	....	....	....
Federal Funds Rate (%)	0.09	0.08	0.07	0.07	0.06	0.08	0.10	....	....	....	....	....
3-Mo. Treasury Bill Rate (%)	0.08	0.04	0.03	0.02	0.02	0.04	0.05	....	....	....	....	....
10-Year Treasury Note Yield (%)	1.08	1.26	1.61	1.64	1.62	1.52	1.32	....	....	....	....	....

## 2020 Historical Data

Monthly Indicator	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Retail and Food Service Sales (a)	0.6	-0.2	-8.6	-14.7	18.2	8.7	1.4	0.8	2.0	0.1	-1.4	-1.2
Auto & Light Truck Sales (b)	16.87	16.88	11.25	8.61	12.13	13.10	14.71	15.25	16.28	16.40	15.87	16.31
Personal Income (a, current \$)	1.1	0.7	-1.9	12.5	-4.0	-0.9	0.9	-2.9	0.7	-0.2	-1.0	0.7
Personal Consumption (a, current \$)	0.6	0.1	-6.9	-12.6	8.6	6.4	1.7	1.0	1.5	0.4	-0.5	-0.5
Consumer Credit (e)	2.5	4.6	-5.2	-18.2	-4.3	5.8	3.8	-3.2	4.9	-0.1	3.1	3.2
Consumer Sentiment (U. of Mich.)	99.8	101.0	89.1	71.8	72.3	78.1	72.5	74.1	80.4	81.8	76.9	80.7
Household Employment (c)	-76	73	-3196	-22166	3854	4876	1677	3499	267	2126	140	21
Nonfarm Payroll Employment (c)	315	289	-1683	-20679	2833	4846	1726	1583	716	680	264	-306
Unemployment Rate (%)	3.5	3.5	4.4	14.8	13.3	11.1	10.2	8.4	7.8	6.9	6.7	6.7
Average Hourly Earnings (All, cur. \$)	28.43	28.51	28.74	30.07	29.74	29.35	29.37	29.47	29.50	29.52	29.61	29.91
Average Workweek (All, hrs.)	34.3	34.4	34.1	34.2	34.7	34.6	34.6	34.7	34.8	34.8	34.8	34.7
Industrial Production (d)	-2.1	-1.4	-5.3	-17.7	-16.2	-11.0	-7.0	-6.6	-6.6	-4.7	-4.7	-3.3
Capacity Utilization (%)	76.1	76.3	73.4	63.4	64.7	68.7	71.5	72.3	72.1	72.9	73.3	74.1
ISM Manufacturing Index (g)	51.1	50.3	49.7	41.7	43.1	52.2	53.7	55.6	55.7	58.8	57.7	60.5
ISM Nonmanufacturing Index (g)	55.9	56.7	53.6	41.6	45.4	56.5	56.6	57.2	57.2	56.2	56.8	57.7
Housing Starts (b)	1.589	1.589	1.277	0.938	1.046	1.273	1.497	1.376	1.448	1.514	1.551	1.661
Housing Permits (b)	1.550	1.478	1.382	1.094	1.246	1.296	1.542	1.522	1.589	1.595	1.696	1.758
New Home Sales (1-family, c)	756	730	623	582	704	839	972	977	971	969	865	943
Construction Expenditures (a)	1.9	1.0	0.4	-3.6	-1.0	-0.2	0.3	1.1	0.3	0.9	1.0	1.1
Consumer Price Index (nsa, d)	2.5	2.3	1.5	0.3	0.1	0.6	1.0	1.3	1.4	1.2	1.2	1.4
CPI ex. Food and Energy (nsa, d)	2.3	2.4	2.1	1.4	1.2	1.2	1.6	1.7	1.7	1.6	1.6	1.6
PCE Chain Price Index (d)	1.9	1.9	1.3	0.4	0.5	0.9	1.0	1.3	1.4	1.2	1.1	1.3
Core PCE Chain Price Index (d)	1.8	1.9	1.7	0.9	1.0	1.1	1.3	1.5	1.6	1.4	1.4	1.5
Producer Price Index (nsa, d)	2.0	1.1	0.3	-1.5	-1.1	-0.7	-0.3	-0.3	0.3	0.6	0.8	0.8
Durable Goods Orders (a)	-4.8	0.9	-20.7	-11.6	10.6	11.3	9.8	2.0	1.6	1.0	2.2	1.5
Leading Economic Indicators (a)	0.5	-0.1	-7.6	-6.4	3.1	3.0	2.0	1.5	0.9	0.7	0.9	0.4
Balance of Trade & Services (f)	-45.5	-41.6	-47.2	-53.0	-54.9	-50.7	-60.7	-63.7	-62.6	-63.7	-67.3	-65.8
Federal Funds Rate (%)	1.55	1.58	0.65	0.05	0.05	0.08	0.09	0.10	0.09	0.09	0.09	0.09
3-Mo. Treasury Bill Rate (%)	1.55	1.54	0.30	0.14	0.13	0.16	0.13	0.10	0.11	0.10	0.09	0.09
10-Year Treasury Note Yield (%)	1.76	1.50	0.87	0.66	0.67	0.73	0.62	0.65	0.68	0.79	0.87	0.93

(a) month-over-month % change; (b) millions, saar; (c) month-over-month change, thousands; (d) year-over-year % change; (e) annualized % change; (f) \$ billions; (g) level. Most series are subject to frequent government revisions. Use with care.

**Calendar of Upcoming Economic Data Releases**

<b>Monday</b>	<b>Tuesday</b>	<b>Wednesday</b>	<b>Thursday</b>	<b>Friday</b>
<b>August 2</b> Construction (Jun) ISM Manufacturing (Jul) IHS Markit Mfg PMI (Jul) Senior Loan Officer Survey (Q3)	<b>3</b> Manufacturers' Shipments, Inventories & Orders (Jun)	<b>4</b> ADP Employment Report (Jul) ISM Services PMI (Jul) IHS Markit Service PMI (Jul) BEA Auto Sales (Jul) BEA Truck Sales (Jul) EIA Crude Oil Stocks Mortgage Applications	<b>5</b> International Trade (Jun) Public Debt (Jul) Challenger Employment Report (Jul) Housing Opportunity Index (Q2) Weekly Jobless Claims	<b>6</b> Employment Situation (Jul) Wholesale Trade (Jun) Consumer Credit (Jun)
<b>9</b> JOLTS (Jun) Treasury Auction Allotments (Jul)	<b>10</b> Productivity & Costs (Q2) NFIB (Jul) Kansas City Fed Labor Market Conditions Indicators (Jul) Kansas City Financial Stress Index (Jul)	<b>11</b> CPI & Real Earnings (Jul) Transportation Services Index (Jun) Cleveland Fed Median CPI (Jul) Monthly Treasury Statement(Jul) EIA Crude Oil Stocks Mortgage Applications	<b>12</b> Producer Prices (Jul) Housing Affordability (Jun) First Time Housing Affordability (Q2) OPEC Crude Oil Spot Prices (Jul) Weekly Jobless Claims	<b>13</b> Import and Export Prices (Jul) Consumer Sentiment (Aug, Preliminary) Survey of Professional Forecasters (Q3)
<b>16</b> Empire State Mfg Survey (Aug) TIC Data (Jun)	<b>17</b> Advance Retail Sales (Jul) IP & Capacity Utilization (Jul) MTIS (Jun) Business Leaders Survey (Aug) Home Builders (Aug)	<b>18</b> New Residential Construction (Jul) CEW (Q1) EIA Crude Oil Stocks Mortgage Applications	<b>19</b> Retail E-Commerce Sales (Q2) Advance Quarterly Services (Q2) Philadelphia Fed Mfg Business Outlook Survey (Aug) Composite Indexes (Jul) Weekly Jobless Claims	<b>20</b>
<b>23</b> Existing Home Sales (Jul) Treasury Auction Allotments (Aug) Chicago Fed National Activity Index (Jul)	<b>24</b> New Residential Sales (Jul) H.6 Money Stock (Jul) Final Building Permits (Jul) Philadelphia Fed Nonmfg Bus Outlook Survey (Aug) Richmond Fed Mfg & Service Sector Surveys (Aug) Steel Imports (Jul)	<b>25</b> Advance Durable Goods (Jul) FRB Philadelphia Coincident Economic Activity Index (Jul) EIA Crude Oil Stocks Mortgage Applications	<b>26</b> GDP & Corporate Profits (Q2, 2nd Estimate) Kansas City Fed Manufacturing Survey (Aug) Weekly Jobless Claims	<b>27</b> Adv Trade & Inventories (Jul) Personal Income (Jul) Dallas Fed Trimmed-Mean PCE (Jul) Consumer Sentiment (Aug, Final)
<b>30</b> Texas Manufacturing Outlook Survey (Aug) Pending Home Sales (Jul)	<b>31</b> Case-Shiller HPI (Jun) FHFA HPI (Jun & Q2) Consumer Confidence (Aug) Agricultural Prices (Jul) Chicago PMI (Aug) Texas Service Sector Outlook Survey (Aug)	<b>September 1</b> ADP Employment Report (Aug) Construction (Jul) ISM Manufacturing (Aug) IHS Markit Mfg PMI (Aug) EIA Crude Oil Stocks Mortgage Applications	<b>2</b> International Trade (Jul) Productivity & Costs (Q2) Manufacturers' Shipments, Inventories & Orders (Jul) Challenger Employment Report (Aug) BEA Auto Sales (Aug) BEA Truck Sales (Aug) Weekly Jobless Claims	<b>3</b> Employment Situation (Aug) ISM Services PMI (Aug) IHS Markit Service PMI (Aug)
<b>6</b>  <b>LABOR DAY</b> <b>ALL MARKETS CLOSED</b>	<b>7</b> QFR (Q2) Public Debt (Aug)	<b>8</b> JOLTS (Jul) Consumer Credit (Jul) Treasury Auction Allotments (Aug) Mortgage Applications	<b>9</b> Transportation Services Index (Jul) QSS (Q2) Kansas City Fed Labor Market Conditions Indicators (Aug) Kansas City Financial Stress Index (Aug) EIA Crude Oil Stocks Weekly Jobless Claims	<b>10</b> Producer Prices (Aug) Wholesale Trade (Jul)

## BLUE CHIP FORECASTERS

### CONTRIBUTORS TO DOMESTIC SURVEY

**ACIMA Private Wealth**, Richmond, VA  
Ardavan Mobasheri

**Action Economics, LLC**, Boulder, CO  
Michael Englund

**AIG**, New York, NY  
Henry Mo and Jerry Cai

**Amherst Pierpont Securities**, Stamford, CT  
Stephen Stanley

**Bank of America**, New York, NY  
Ethan Harris

**Barclays**, New York, NY  
Michael Gapen

**BBVA USA**, Houston, TX  
Nathaniel Karp

**BMO Capital Markets Economics**, Toronto, Canada  
Douglas Porter

**BNP Paribas North America**, New York, NY  
Bricklin Dwyer

**Chan Economics**, New York, NY  
Anthony Chan

**Chmura Economics & Analytics**, Richmond, VA  
Christine Chmura and Xiaobing Shuai

**Comerica**, Dallas, TX  
Robert A. Dye

**Daiwa Capital Markets America**, New York, NY  
Michael Moran

**DePrince & Associates**, Murfreesboro, TN  
Albert E. DePrince Jr.

**Economist Intelligence Unit**, New York, NY  
Leo Abruzzese and Jan Friederich

**Fannie Mae**, Washington, DC  
Douglas Duncan

**Georgia State University**, Atlanta, GA  
Rajeev Dhawan

**GLC Financial Economics**, Providence, RI  
Gary L. Ciminero

**Goldman, Sachs & Co.**, New York, NY  
Jan Hatzius

**Grant Thornton**, Chicago, IL  
Diane Swonk

**IHS Markit**, Saint Louis, MO  
Joel Prakken & Chris Varvares

**ING Financial Markets**, London, England  
James Knightley

**J.P. Morgan Chase**, New York, NY  
Bruce Kasman

**Loomis, Sayles & Company, L.P.**, Boston, MA  
Brian Horrigan

**MacroFin Analytics & Rutgers Business School**, Wayne, NJ  
Parul Jain

**MacroPolicy Perspectives**, New York, NY  
Julia Coronado and Laura Rosner

**Mizuho Research Institute**, Tokyo, Japan  
Takehiro Noguchi

**Moody's Analytics**, West Chester, PA  
Mark M. Zandi

**Naroff Economic Advisors**, Philadelphia, PA  
Joel L. Naroff

**NatWest Markets**, Greenwich, CT  
Michelle Girard and Kevin Cummins

**Nomura Securities International, Inc.**, New York, NY  
Lewis Alexander

**Northern Trust Company**, Chicago, IL  
Carl Tannenbaum

**Oxford Economics**, New York, NY  
Gregory Daco

**PNC Financial Services Group**, Pittsburgh, PA  
Gus Faucher

**RDQ Economics**, New York, NY  
John Ryding and Conrad de Quadros

**Regions Financial Corporation**, Birmingham, AL  
Richard F. Moody

**Scotiabank Group**, Toronto, Canada  
Jean-Francois Perrault and Brett House

**Societe Generale**, NY, New York  
Stephen W. Gallagher

**S&P Global**, New York, NY  
Beth Ann Bovino

**Swiss Re**, New York, NY  
Jerome Haegeli

**ThruTheCycle.com**, White Plains, NY  
John Lonski

**TS Lombard**, London, UK  
Steven Blitz

**Via Nova Investment Management**, Fredericksburg, VA  
Alan Gayle

**Wells Fargo**, Charlotte, NC  
Jay Bryson and Mark Vitner

### CONTRIBUTORS TO INTERNATIONAL SURVEY

**Barclays Capital**, New York, NY

**BMO Capital Markets Economics**, Toronto, Canada

**IHS Markit**, London, England

**ING Financial Markets**, London, England

**Mizuho Research Institute**, Tokyo, Japan

**Moody's Analytics**, West Chester, PA

**Nomura Securities International, Inc.**, New York, NY

**Northern Trust Company**, Chicago, IL

**Oxford Economics**, Wayne, PA

**Scotiabank Group**, Toronto, Canada

**S&P Global**, New York, NY

**TS Lombard**, London, UK

**Wells Fargo**, Charlotte, NC

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-60**  
**Page 1 of 1**

**REQUEST:**

If not provided previously, provide all supporting work papers and documentation for the risk premium calculations included in Exhibit DWD-1, Schedules DWD-3.1 through DWD-3.13. Include all source data used in the calculations. Provide all spreadsheets in Excel format with cell formulas intact.

**RESPONSE:**

Please see Attachment 2 to the Company's response to Staff DR No. 1-55.

Respondent: Dylan D'Ascendis

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-61**  
**Page 1 of 1**

**REQUEST:**

If not provided previously, provide the source documents used in the equity risk premium study results in Schedule DWD-3.13. Provide updated allowed returns on equity from fully litigated natural gas utility rate cases through the most recent month of 2021.

**RESPONSE:**

Please see Attachment 2 to the Company's response to Staff DR No. 1-55. Also, please see Attachment 1.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-61\_Att1 - Gas Utilities ROR.xlsx, 1 Page.

Respondent: Dylan D'Ascendis

<b>State</b>	<b>Company</b>	<b>Case Identification</b>	<b>Service</b>	<b>Case Type</b>	<b>Date</b>	<b>Decision Type</b>	<b>Return on Equity (%)</b>
Washington	Cascade Natural Gas Corp.	D-UG-200568	Natural Gas	Distribution	5/18/2021	Fully Litigated	9.40
Pennsylvania	PECO Energy Co.	D-R-2020-3018929	Natural Gas	Distribution	6/17/2021	Fully Litigated	10.24
West Virginia	Hope Gas Inc.	C-20-0746-G-42T	Natural Gas	Distribution	7/27/2021	Fully Litigated	9.54

Source: Regulatory Research Associates

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-62**  
**Page 1 of 1**

**REQUEST:**

Provide all bond rating agency reports (Standard and Poor's, Moody's, Fitch) on Atmos Energy from 2019 through the most recent month in 2021.

**RESPONSE:**

Please see the Company's response to Staff DR No. 2-35.

Respondent: Joe Christian



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-63**  
**Page 1 of 1**

**REQUEST:**

Provide the following:

- a. The current authorized ROE for Atmos Energy in each of the regulatory jurisdictions in which it operates. Provide the date that each ROE was authorized.
- b. Provide the Commission Order authorizing each ROE listed in part a.
- c. State whether each ROE was authorized pursuant to a fully litigated rate case or if it was based on a settlement.

**RESPONSE:**

- a. Please see the Company's response to Staff DR No. 2-33.
- b. Please see Attachment 1.
- c. Please see the Company's response to Staff DR No. 2-33.

**ATTACHMENT:**

ATTACHMENT 1 - AG\_1-63\_Att1 - ROE - Commission Orders.pdf, 394 Pages.

Respondent: Joe Christian

Decision No. C18-0311

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO**

PROCEEDING NO. 17AL-0429G

IN THE MATTER OF ADVICE LETTER NO. 530 FILED BY ATMOS ENERGY CORPORATION TO INCREASE THE BASE RATES AND THE PROPOSED RECOVERY OF RATE CASE EXPENSES TO BE EFFECTIVE JULY 27, 2017.

**DECISION ADDRESSING EXCEPTIONS,  
PERMANENTLY SUSPENDING TARIFF  
SHEETS, AND ESTABLISHING RATES**

Mailed Date: May 3, 2018  
Adopted Date: April 4, 2018

**TABLE OF CONTENTS**

- I. BY THE COMMISSION .....2
  - A. Statement .....2
  - B. Discussion.....3
  - C. Staff’s Motion to Respond to Atmos’ Response to Exceptions .....6
  - D. Exceptions to Decision No. R18-0014 .....7
    - 1. Extension of the SSIR Mechanism.....7
      - a. Positions of the Parties .....9
      - b. Findings and Conclusions .....11
    - 2. Return on Equity (ROE).....12
      - a. Positions of the Parties .....13
      - b. Findings and Conclusions .....15
    - 3. Capital Structure.....16
      - a. Positions of the Parties .....17
      - b. Findings and Conclusions .....17
    - 4. Weighted Average Cost of Capital.....18
    - 5. Storage Gas Inventory as a Rate Base Asset.....18
      - a. Positions of the Parties .....19
      - b. Findings and Conclusions .....20

6.	Average Rate Base Versus Year-End Rate Base.....	20
a.	Positions of the Parties .....	20
b.	Findings and Conclusions .....	21
7.	Recovery of Rate Case Expenses .....	21
a.	Positions of the Parties .....	22
b.	Findings and Conclusions .....	23
E.	Prepaid Pension Asset and Pension Expense .....	23
a.	Positions of the Parties .....	24
b.	Findings and Conclusions .....	24
F.	Weather Normalization Adjustment.....	25
a.	Positions of the Parties .....	25
b.	Findings and Conclusions .....	26
G.	Establishment of Rates and Compliance Procedures .....	26
II.	ORDER.....	28
A.	The Commission Orders That: .....	28
B.	ADOPTED IN COMMISSIONERS’ WEEKLY MEETING April 4, 2018.....	30
III.	COMMISSIONER WENDY M. MOSER DISSENTING .....	30
A.	Authorized Return on Equity (ROE).....	30

---

**I. BY THE COMMISSION**

**A. Statement**

1. This Decision adopts and modifies Decision No. R18-0014 (Recommended Decision), issued on January 8, 2018, consistent with the Commission’s consideration of the exceptions to the Recommended Decision.

2. Atmos Energy Corporation (Atmos or Company) is authorized to file revised tariff sheets to adjust its rates with General Rate Schedule Adjustments (GRSAs) calculated in accordance with findings and directives in the Recommended Decision, as revised by this

Decision, and in Decision No. C18-0169-I, issued on March 12, 2018, addressing the Tax Cut and Jobs Act of 2017 (TCJA).

**B. Discussion**

3. On June 26, 2017, Atmos filed Advice Letter No. 530 with supporting testimony and exhibits. The proposed effective date of the tariffs filed with Advice Letter No. 530 was July 27, 2017.

4. Atmos sought to increase the Company's annual revenues by approximately \$3.4 million, or approximately 3.38 percent. As requested, Atmos would accomplish an increase in base rate collections of \$2.9 million by applying a proposed GRSA of 8.52 percent to each component of the Company's base rates, as set forth on the tariff sheets filed with Advice Letter No. 530. Atmos also sought to apply a GRSA of 1.19 percent to recover approximately \$476,000 of rate case expenses over a period of one year.

5. Atmos also proposed to extend the System Safety and Integrity Rider (SSIR) rate adjustment mechanism for five years. Atmos included the tariff sheets for the extended SSIR with Advice Letter No. 530.

6. By Decision No. C17-0564, issued on July 12, 2017, the Commission suspended for 120 days, the effective date of the tariff pages submitted with Advice Letter No. 530 pursuant to § 40-6-111(1), C.R.S., and set the matter for hearing before an Administrative Law Judge (ALJ).

7. By Decision No. R17-0597-I, issued on July 21, 2017, ALJ Steven H. Denman suspended the effective date of the tariffs filed with Advice Letter No. 530 for an additional 90 days pursuant to § 40-6-111(1), C.R.S., or, in this proceeding, to February 22, 2018.

8. On January 8, 2018, ALJ Denman issued the Recommended Decision.

9. On January 26, 2018, by Decision No. C18-0069-I, the Commission stayed the Recommended Decision and extended the dates to file exceptions to the Recommended Decision pursuant to § 40-6-109(2), C.R.S., and Rule 1505(a), of the Commission's Rules of Practice and Procedure, 4 *Code of Colorado Regulations* (CCR) 723-1. The Commission stayed the Recommended Decision primarily because rates for Atmos established if the Recommended Decision were to become the decision of the Commission, they would not reflect the impacts of the TCJA signed into law on December 22, 2017. The Commission explained that it was not inclined to establish new base rates for Atmos based on federal tax provisions no longer in effect before it was understood: (1) how Atmos will return to customers the savings from the materially lower corporate tax rates that are accruing relative to the tax-related expenses in current rates and any new rates based on the evidentiary record in this rate proceeding; and (2) how Atmos will put into place rates that are further adjusted to account fully for the various changes in tax law in the TCJA. The Commission set March 7, 2018 as the deadline for the filing of exceptions to the Recommended Decision. Responses to exceptions were due March 21, 2018.

10. On February 1, 2018, by Decision No. C18-0075, the Commission opened a statewide proceeding (Proceeding No. 18M-0074EG) for the Commission's consideration of the impacts of the TCJA on the revenue requirements and rates of all Colorado investor-owned electric and natural gas utilities including Atmos. The Commission directed Atmos and the other Colorado utilities to record and track as a deferred regulatory liability, the difference in tax liabilities caused by the enactment of the TCJA as compared to the federal tax amounts used to establish rates currently in effect. The Commission further ordered Atmos and the other Colorado utilities to submit a filing, no later than February 21, 2018, that addresses: (1) the tracking and monitoring of the TCJA-related deferred regulatory liability; (2) proposals for implementing

any refund due to customers associated with the deferred regulatory liability; and (3) the establishment of updated revenue requirements and rates that reflect the prospective impacts of the TCJA.

11. The Commission explained in Decision No. C18-0075 that this statewide proceeding provides a degree of uniformity in the treatment of the issues relating to the impacts of the TCJA for all Colorado investor-owned electric and natural gas utilities and their customers.<sup>1</sup> The Commission recognized, however, that the specific circumstances of each utility also must be taken into account. Specifically, the Commission acknowledged that Atmos and certain other utilities have ongoing rate proceedings before the Commission at this time and clarified that the filing requirements were not intended to preclude the implementation of potential refunds or the establishment of new rates in those other ongoing proceedings.

12. On February 26, 2018, in this proceeding, Atmos filed a Stipulation and Partial Settlement Agreement Regarding Incorporating TCJA Impacts Into Atmos Energy Rates (TCJA I Settlement). The agreement was joined by all parties in this proceeding, including Atmos, Staff of the Colorado Public Utilities Commission (Staff), the Office of Consumer Counsel (OCC), and Energy Outreach Colorado (EOC). The TCJA I Settlement contained provisions addressing: (1) the TCJA-related regulatory liability established in the statewide TCJA proceeding; (2) the accumulated deferred income tax impacts associated with the TCJA; (3) TCJA-impacts on base rates going forward; (4) provisional rates for effect on April 1, 2018; (5) the exceptions process for the Recommended Decision; and (6) the establishment of final rates to conclude this rate proceeding.

---

<sup>1</sup> Decision No. C18-0075, Proceeding No. 18M-0074EG, issued February 1, 2018, at ¶13.

13. By Decision No. C18-0169-I, issued March 12, 2018, the Commission granted the joint motion to approve the TCJA I Settlement. Consistent with the terms of the TCJA I Settlement, the Commission authorized Atmos to put in place base rates at the same levels currently in effect, subject to refund, effective April 1, 2018.<sup>2</sup> Atmos also agreed to file an amended advice letter in this proceeding with an effective date of November 3, 2017 such that the 210-day suspension period for the tariffs filed under Advice Letter No. 530 would extend through June 1, 2018.<sup>3</sup> The Commission also approved the stipulation that the annual base rate revenue decrease associated with the TCJA is \$2,102,138 and agreed to allow Atmos to incorporate this stipulated amount of TCJA impacts within the base rates established in this rate case.

14. Pursuant to § 40-6-109, C.R.S., Atmos, the OCC, and Staff each filed exceptions to the Recommended Decision on March 7, 2018.

15. Responses to the exceptions were filed by Atmos and the OCC on March 21, 2018.

**C. Staff's Motion to Respond to Atmos' Response to Exceptions**

16. On March 23, 2018, Staff filed a Motion for Leave to File Response to Atmos Energy Corporation's Response to Exceptions. Staff argues that the language in Atmos' response directed at Staff's exceptions implied that Proceeding No. 15AL-0135G was not a fully litigated rate proceeding. Staff contends that this implication is materially false.

17. Rules 1308(a) and 1505(a), 4 CCR 723-1, permit responses to exceptions. In this matter, both Atmos and OCC timely filed responses as permitted by Commission rules.

---

<sup>2</sup> Decision No. C18-0169-I, Proceeding No. 17AL-049G, issued March 12, 2018, at ¶16.

<sup>3</sup> Decision No. C18-0169-I, Proceeding No. 17AL-049G, issued March 12, 2018, at ¶15.

However, pursuant to Rule 1308(b), 4 CCR 723-1, parties may not file responses to a response in the exceptions process, except upon motion. The motion seeking additional response must “demonstrate a material misrepresentation of a fact, an incorrect statement or error of law, or accident or surprise which ordinary prudence could not have guarded against.” Here, the record is clear that Proceeding No. 15AL-0135G was a fully litigated case. Additional response for the purposes identified by Staff is not necessary or warranted in these circumstances. We therefore deny Staff’s motion.

**D. Exceptions to Decision No. R18-0014**

**1. Extension of the SSIR Mechanism**

18. As part of this Phase I rate proceeding, Atmos requests an extension of the SSIR through December 31, 2023. The five-year extension is intended to enable Atmos to remove or replace an additional 109 miles of high-risk bare steel and polyvinyl chloride (PVC) mains.

19. The Recommended Decision affirms that the Commission has the discretion to allow the recovery of costs either through a cost adjustment clause such as an SSIR or through base rates pursuant to a general rate proceeding. The ALJ thus finds that the Commission may allow Atmos to recover pipeline replacement capital expenditures through an extended SSIR.<sup>4</sup>

20. The ALJ further states that the Commission: “cannot ignore that the overarching reason for pipeline integrity replacement and cost recovery programs, such as the SSIR, is to promote the safety of gas utility facilities and to protect customers and the public from injury or loss of life.”<sup>5</sup> The ALJ concludes that: “Failure of bare steel and PVC pipelines, if not repaired

---

<sup>4</sup> Recommended Decision, at ¶82.

<sup>5</sup> Recommended Decision, at ¶83.



or replaced expediently, could likely lead to catastrophic events such as fires, explosions, serious property damage, and loss of life.”<sup>6</sup>

21. The ALJ finds that Atmos satisfied its burden to prove that significant capital expenditures for Commission-approved SSIR projects will occur over the full five-year period associated with the proposed extension of the SSIR without corresponding revenue increases. The ALJ concludes that a five-year extension of the SSIR will enable the Company: “to continue assessing its assets, keeping current with the most recent federal and state mandates, identifying new threats, and working to improve the overall integrity and safety of its pipeline system.”<sup>7</sup>

22. As explained in the Recommended Decision, the OCC recommended that, if the Commission extends the SSIR, the Commission should adopt the following limits: (1) the SSIR extension should be only for two years; (2) the SSIR capital costs should earn a return based upon the Company’s weighted cost of debt; and (3) the cap on the SSIR total bill impact should be reduced from the current 2.5 percent to 2 percent.

23. The ALJ rejects these recommendations in the Recommended Decision. He concludes that the OCC’s proposed additional two-year extension is arbitrary, capricious, and unsupported. The ALJ finds that limiting the SSIR extension to only two years would be contrary to, and curtail unnecessarily, the public safety benefits of the accelerated pipeline replacement program that is the rationale for the SSIR. The ALJ also concludes that Atmos will finance the SSIR investments with both debt and equity and agrees with Atmos that there is no justification for SSIR investments to earn a return set only at the Company’s weighted cost of

---

<sup>6</sup> *Ibid.*

<sup>7</sup> Recommended Decision, at ¶85.

debt. The ALJ further finds that a 2 percent cap would slow the replacement of high-risk infrastructure and would not provide a substantial ratepayer safeguard.<sup>8</sup>

**a. Positions of the Parties**

24. In its exceptions, the OCC reasserts its claim that, contrary to the ALJ's findings, Atmos failed to demonstrate that an extension of the SSIR is necessary. The OCC argues that the ALJ's primary reason for granting the extension was his reliance on Atmos' testimony that it would take 67 years to replace its bare steel and PVC mains in the ordinary course of business. The OCC contends that this reason was unproven. The OCC claims that it produced a set of circumstances that it believes supports a bare steel replacement pace of 2.1 years. The OCC also concludes that this pace of pipeline replacement as one Atmos has shown itself to be capable of maintaining within the Company's ordinary course of business.

25. Further, the OCC argues in its exceptions that the ALJ's rejection of its proposed limitations to any SSIR extension is also flawed. The OCC argues that any extension granted by the Commission should be: (1) only for two additional years so that the total duration of the SSIR would be five years; (2) conditioned on a return on SSIR capital investments lowered to the Company's weighted cost of debt; and (3) capped at a total bill impact of 2 percent.

26. In responses, Atmos argues that the OCC did not dispute that bare steel pipe and PVC pipe: (1) are no longer considered appropriate for the construction of natural gas distribution systems; (2) deteriorate with age; (3) are prone to leaks and potential failures; and (4) create risks for Atmos' customers and utility workers. Atmos also argues that no party, including the OCC, disputed the testimony that, if Atmos returned to the historic pace of

---

<sup>8</sup> Recommended Decision, at ¶95.

replacement that occurred before the SSIR was implemented, it would take the Company approximately 67 years to replace the remaining bare steel and PVC pipe. Atmos further points to testimony from its witness who stated that a continuation of replacement projects at the pace cited by the OCC was not sustainable as the ordinary course of business.<sup>9</sup>

27. Atmos supports the ALJ's rejection of the OCC's proposed conditions to an SSIR extension. Atmos argues that the SSIR extension is more reasonable than alternative proposals, because the Company would need to file annual rate cases during the five-year period of 2019 through 2023 if it went forward with the replacement investments in the ordinary course of business without SSIR treatment. Atmos notes that annual rate cases would layer annual rate case expenses on top of the revenue requirement associated with the investments. Atmos also argues that, without SSIR treatment, the Company would earn less than its authorized return on equity (ROE) by between 150 and 375 basis points each year, all else held equal.

28. Atmos further argues that if the Commission authorizes the SSIR mechanism to continue only in two-year increments, it will require five regulatory proceedings (or three additional cases) in order to complete a ten-year replacement plan. Atmos further argues that, contrary to the OCC's perspective on a rate cap, Staff offered testimony that SSIR investments would be reasonable even if they resulted in a 2.5 percent rate increase annually.

29. Atmos also argues the ALJ correctly concluded that, based on the evidence, the Company finances SSIR investments with both debt and equity and, as such, there is no basis to authorize a debt return. Atmos further argues that the OCC made this same argument with regard

---

<sup>9</sup> Tr. Vol. 1, 11/7/2017, p. 170.

to Public Service's similar infrastructure rate mechanism in Proceeding No. 15AL-0135G and the Commission expressly rejected the position.

**b. Findings and Conclusions**

30. The Commission denies the OCC's exceptions regarding the SSIR. We agree with the ALJ's rationale for granting Atmos' requested five-year extension. The SSIR provides a reasonable means of cost recovery to the Company as it completes timely and critical infrastructure projects that promote safety. The Commission also adopts the ALJ's finding to reject the OCC's proposed limits on an extended SSIR for the reasons set forth in the Recommended Decision.

31. In its exceptions, Staff seeks clarification and direction from the Commission as to the policy considerations and criteria applied when addressing system safety and integrity programs and associated cost recovery going forward. Staff does not disagree with the ALJ's conclusions regarding the benefits of the SSIR to Atmos' customers; however, Staff argues that the ALJ applied different criteria to his approval of the extension of the SSIR than the Commission had applied in previous decisions.

32. The Commission is reluctant to set forth a policy on cost adjustments and rate mechanisms in the narrow context of this rate proceeding for a single natural gas utility. We also conclude that such a policy is not required. However, based on the evidence in this proceeding and the rationale for upholding of the approval of the five-year extension, the Commission concludes that the SSIR remains an appropriate cost recovery mechanism for Atmos in these circumstances. Atmos is responding to federal regulators and this state's concerns about the safety of natural gas pipelines. The magnitude of the capital investments associated with the

planned replacement of bare steel and PVC pipe are significant and warrant the extension of the SSIR.

## 2. Return on Equity (ROE)

33. In the Recommended Decision, the ALJ establishes the authorized ROE for Atmos within the range from 9.3 to 9.9 percent and sets 9.7 percent as the authorized ROE used for calculating rates.<sup>10</sup>

34. The ALJ explains that in arriving at these ROE values, he considered all of the analyses presented by the parties. He concludes that: “The wide range of results and the divergence of positions on inputs and assumptions confirm the inherent problems with the methods and the need for the Commission to exercise its judgment in considering the various factors that explain the differences in the calculations.”<sup>11</sup>

35. The ALJ finds that the Multi-Stage Discounted Cash Flow (MS-DCF) results, which he recognizes the Commission has examined in at least three recent Phase I rate cases, and recent shifts in the Federal Reserve’s monetary policy together support an increase in the Company’s authorized ROE from its existing level of 9.6 percent. The ALJ thus rejects a decrease in the ROE.

36. The ALJ notes that in the last year, the Federal Reserve has raised the Fed Funds Rate four times by 25 basis points each time. The ALJ concludes that the interest rates affected by Federal Reserve decisions have a direct impact on the returns to investors who own shares in

---

<sup>10</sup> Recommended Decision, at ¶169.

<sup>11</sup> *Ibid.*

other businesses having comparable financial characteristics and business risks as utilities regulated by the Commission.<sup>12</sup>

**a. Positions of the Parties**

37. In its exceptions, Atmos requests that the Commission overturn the ALJ's recommended increase in the Company's ROE to 9.7 percent and instead increase the Company's ROE further to 10.50 percent.

38. Atmos states that its expert witness Dylan D'Ascendis applied the Constant Growth DCF model, the MS-DCF model, the Capital Asset Pricing Model, and the Bond Yield Plus Risk Premium approach using a proxy group consisting of other natural gas distribution companies and a combination of electric and gas utilities. Based on these models applied to the proxy group of companies, he found that cost of equity for Atmos is currently in the range of 10.00 percent to 10.75 percent. Atmos argues that an authorized ROE of 10.50 percent is reasonable and appropriate.

39. In contrast, Staff requests in its exceptions that the Commission authorize a reduction in the Company's current authorized ROE of 9.6 percent either to a level closer to Staff's recommendation of 9.0 percent, or, in the alternative, to a level near the bottom of the range from 9.3 to 9.9 percent established in the Recommended Decision. Staff argues that a reduction in the authorized ROE would align Atmos' authorized ROE with the MS-DCF model results that the Commission has historically favored. Staff also argues that a lower ROE would acknowledge the principal of "gradualism" in ratemaking.

---

<sup>12</sup> Recommended Decision, at ¶157.

40. The OCC also requests in its exceptions that the Commission lower the Company's authorized ROE. The OCC argues that it presented substantial evidence to support an ROE of 9.0 percent based on various analyses using several techniques that resulted in a range of ROE values from 6.7 percent to 8.75 percent "with the most consensus between 6.81% and 7.21%."<sup>13</sup> According to the OCC, the ALJ erred in not establishing an ROE considerably weighted by the results of several MS-DCF analyses.

41. In response, Atmos faults Staff's and the OCC's reliance on recent trends in ROE decisions both nationally and in Colorado. Atmos argues that both Staff and the OCC have relied upon ROE information that was outdated by the time this case went to hearing. Atmos further argues that, by incorporating more recent cases, the average authorized ROE for natural gas utilities in 2017 is 9.78 percent, while the average authorized ROE for litigated matters in 2017 is 9.89 percent.

42. Atmos also addresses the criticisms of the ALJ's discussion regarding the Federal Reserve's monetary policy in the Recommended Decision. Atmos argues that there was uncontroverted evidence that the actions of the Federal Reserve created a likelihood of "increasing interest rates." Atmos also argues that the ALJ did not use this fact to set an ROE but, rather, used the information to put the MS-DCF results into proper context. As such, Atmos argues that there was no error in the ALJ relying on the evidence addressing federal monetary policy to the limited extent he did in the Recommended Decision.

---

<sup>13</sup> OCC Exceptions, p. 3.

**b. Findings and Conclusions**

43. The Commission agrees with the ALJ that based on the evidence in the record and the proper exercise of judgment regarding the results and impacts on rates, a reasonable range for the authorized ROE for Atmos extends from 9.3 to 9.9 percent. This range satisfies the standards articulated in *Bluefield Waterworks and Improvement Co. v. Public Service Comm'n of West Virginia*, 262 U.S. 679 (1923) and *Federal Power Comm'n v. Hope Natural Gas Co.*, 320 U.S. 591 (1944). The range established therefore excludes the request by Atmos for a 90 basis point increase to 10.5 percent as well as the 70 basis point decrease to the 9.0 percent level advocated by Staff and the OCC. In consideration of the possibility of increasing interest rates under expected federal monetary policy, the ALJ properly narrows the breadth of reasonable values for the point estimates of the authorized ROE for calculating rates.

44. Within the range established in the Recommended Decision, the Commission interprets the various model results and economic factors differently than the ALJ. The analyses presented by Staff and the OCC and the parties' vigorous discussion on the issues surrounding the inputs and assumptions that underlie the models, including the projected growth rates that enter into the MS-DCF model, support a reduction in the authorized ROE for Atmos for calculating rates instead of an increase. Although we agree with the ALJ that Atmos has sustained a stable and strong credit rating that has afforded it reasonable access to capital at its current authorized ROE,<sup>14</sup> we find the analysis from Staff and the OCC compelling that a reduced ROE within the established range is appropriate.

---

<sup>14</sup> Recommended Decision, at ¶171.



45. Within the range established by the Recommended Decision, we therefore find that this record supports an ROE of 9.45 percent.

46. The Commission concludes that an authorized ROE of 9.45 percent for calculating rates will ensure that Atmos is able to maintain access to equity capital at a reasonable cost. Therefore, we affirm the Recommended Decision in that the authorized ROE for Atmos will be established within the range from 9.3 percent to 9.9 percent, and provide that an authorized ROE of 9.45 percent will be used for calculating rates.

### **3. Capital Structure**

47. The Recommended Decision approves a capital structure of 55.58 percent equity and 44.42 percent debt for the test year ending March 31, 2017.<sup>15</sup> This capital structure, advocated by Atmos, is the per-books capital structure for the test year adjusted for the long-term debt financing that occurred on June 5, 2017.<sup>16</sup>

48. The ALJ finds that the OCC had failed to produce any credible evidence that material prejudice to Atmos' ratepayers would result from using this capital structure. The ALJ concludes that OCC has thereby failed to satisfy its burden of proof to demonstrate why the Commission instead should use the OCC's proposed capital structure of 52 percent equity and 48 percent debt for ratemaking purposes. The OCC's recommended ratio is identical to the capital structure settled upon by the parties in the Company's two most recent rate cases and ultimately approved by the Commission.

---

<sup>15</sup> Recommended Decision, at ¶189.

<sup>16</sup> Recommended Decision, at ¶179.

**a. Positions of the Parties**

49. The OCC takes exception to the ALJ's findings that the record supports approval of a capital structure of 55.58 percent equity and 44.42 percent debt. The OCC maintains instead that such a capital structure presents a material prejudice to ratepayers because it increases the Company's revenue requirement by approximately \$600,000 as compared to the revenue requirements calculated using the Company's currently authorized capital structure of 52 percent equity and 48 percent debt.

50. In response, Atmos argues that the OCC's recommendation for capital structure is inconsistent with Commission precedent. Atmos notes that the Commission historically has based capital structures on the actual level of long-term debt and common equity. Atmos also argues that the Colorado Supreme Court has held that, unless it is demonstrated by a substantial showing that ratepayers are materially prejudiced by the actual capital structure that finances utility operations, the Commission should use that actual utility capital structure in calculating rates.

**b. Findings and Conclusions**

51. The capital structure of 55.58 percent equity and 44.42 percent debt, which is based on booked amounts and a known and measureable adjustment, is reasonable and has not been shown to cause material harm to Atmos' customers. Consistent with the Recommended Decision, we approve that capital structure for the calculation of the Company's rate of return (ROR). The OCC's exceptions on this issue are therefore denied.

**4. Weighted Average Cost of Capital**

52. The ROR used for setting rates in Atmos’ most recent base rate proceeding was 7.82 percent.<sup>17</sup>

53. Given the Commission’s decision to reduce Atmos’ authorized ROE to 9.45 percent and its decision to reject the OCC’s request to maintain the Company’s current capital structure, the weighted average cost of capital value to be used as the ROR on rate base is approved as follows:

	Equity	Debt	<u>Total ROR</u>
Ratio	55.58%	44.42%	
Cost	9.45% <sup>18</sup>	5.17%	
Weighted Component	5.25%	2.30%	7.55%

54. The Commission concludes that this result satisfies the standard of *Bluefield* and *Hope* and is therefore reasonable and appropriate for the establishment of rates in this proceeding.

**5. Storage Gas Inventory as a Rate Base Asset**

55. The Recommended Decision explains that, as part of its case, the OCC recommended that the Commission remove the Company’s gas storage inventory from rate base but allow Atmos to recover its financing costs through its gas cost adjustment (GCA) at a short-term financing rate. The OCC argued that storage inventory costs are short-term and thus Atmos finances them on a short-term basis. The ALJ rejects the OCC’s recommendations for the same reasons that another ALJ and the Commission rejected the same proposals in Proceeding

---

<sup>17</sup> Decision No. R15-1146, issued October 23, 2015, Proceeding No. 15AL-0299G, Attachment A, ¶ 8.

No. 12AL-1268G. Specifically, the ALJ rejects the OCC’s “financing matching argument”<sup>19</sup> and agrees with Atmos that the Company does not have a specific funding mechanism for storage gas.

**a. Positions of the Parties**

56. In its exceptions, the OCC argues that the ALJ erred in allowing Atmos to include storage gas in the test-year rate base. The OCC argues that this practice leads to an excessive ROR for storage gas costs because it violates the financial matching principle. Specifically, the OCC argues that proper application of the financial matching principle requires that short-term or current liabilities should finance short-term or current assets such as storage gas financed instead of long-term sources of financing such as long-term debt, preferred stock, and common equity.

57. In response, Atmos echoes the Recommended Decision by noting that the Commission denied a similar recommendation in Proceeding No. 12AL-1268G. In that previous rate case, the ALJ found that it was “inappropriate to implement the recommendations to use short-term rates to develop the return component of the [gas storage inventory].”<sup>20</sup> The ALJ went on to note that gas storage inventory is an asset under Federal Energy Regulatory Commission accounting that should have a return component to it.

58. Further, Atmos states that the OCC’s argument that there is a distinction between storage gas facilities and storage gas itself is incorrect and beside the point. According to Atmos, investors pay for the storage gas inventory, which the Company holds until needed, even if Atmos itself does not own the storage facilities.

---

<sup>19</sup> Recommended Decision, at ¶121.

<sup>20</sup> Decision No. R13-1307, issued October 22, 2013, Proceeding No. 12AL-1268G, ¶ 486.

**b. Findings and Conclusions**

59. We find no reason to deviate from the ratemaking conventions used for gas storage in the other rate proceedings discussed in the Recommended Decision. We therefore uphold the ALJ's finding to allow Atmos to include its gas storage inventory in rate base and to earn its ROR on such inventories. The OCC's exceptions on this issue are therefore denied.

**6. Average Rate Base Versus Year-End Rate Base**

60. In the Recommended Decision, the ALJ concludes that the evidentiary record in each utility rate case must demonstrate the need for using year-end values for the determination of the value of rate base.<sup>21</sup> The ALJ also concludes that Atmos failed to demonstrate that special circumstances exist, such as earnings attrition beyond the control of the Company, to justify the use of year-end rate base. The ALJ states that he agrees with Staff that the difference of \$4.8 million between the balances of year-end rate base over average rate base does not demonstrate that earnings attrition will result and that the evidence relied upon by Atmos in its case to show alleged earnings attrition is neither convincing nor persuasive.<sup>22</sup>

**a. Positions of the Parties**

61. Atmos requests in its exceptions that the Commission modify the Recommended Decision by adopting year-end calculations of its rate base instead of the average calculations of rate base values as approved by the ALJ. Atmos argues that year-end rate base is appropriate under the financial conditions the Company currently faces. Atmos claims that year-end rate base will allow it a reasonable opportunity to earn a fair ROR on rate base going forward, while the use of average historical rate base does not sufficiently account for regulatory lag related to

---

<sup>21</sup> Recommended Decision, at ¶105.

<sup>22</sup> Recommended Decision, at ¶103.

the investment utilized by its customers, but not reflected in rates. Atmos points to the Company earning an ROE that was 155 basis points below its average authorized ROE between 2012 and 2016 as evidence of earnings attrition.

62. In response, the OCC asserts that Atmos' claim of earnings attrition is the result of factors within the Company's control. For example, the OCC argues that Amos establishes the pace at which earnings attrition occurs through its pursuit of capital infrastructure additions. The OCC also argues that cost trackers such as the SSIR guarantee a set revenue recovery and ensure cost recovery, which mitigate against the earnings attrition claimed by the Company. The OCC also maintains that the Commission has expressed a preference for the use of average rate base (pointing, for example, to Decision No. C93-1346<sup>23</sup>).

#### **b. Findings and Conclusions**

63. We uphold the Recommended Decision with respect to its directive that Atmos calculate rates based on 13-month average plant values for the test year instead of year-end measures. We agree with the ALJ that Atmos has not justified the use of a year-end rate base, particularly in the context of the relief provided to the Company by the extension of the SSIR.

#### **7. Recovery of Rate Case Expenses**

64. The Recommended Decision allows Atmos to recover rate case expenses through a GRSA. The ALJ explains that he agrees with Atmos that rate case expenses are a legitimate cost of providing utility service, necessitated by the Commission's regulation, and that the Company has a right to recover all reasonable operating expenses, including rate case expenses.<sup>24</sup>

---

<sup>23</sup> Decision No. C93-1346, issued October 27, 1993, Proceeding No. 93S-001EG.

<sup>24</sup> Recommended Decision, at ¶127.

Specifically, the ALJ approves actual rate case expenses of \$349,252.61 to be amortized over a one-year period.

65. The Recommend Decision explains that the OCC sought an amortization period of three years during which the Commission should prevent Atmos from recovering any remaining rate case expenses should it file a new rate case. The ALJ concludes that such an approach is arbitrary and possibly confiscatory.<sup>25</sup>

**a. Positions of the Parties**

66. In its exceptions, the OCC argues that Atmos' requested rate case expenses should be limited to the actual expenses incurred, not to exceed the original estimate, and be amortized over three years. Further, the OCC argues that, in the alternative, the amount of rate case expenses awarded to Atmos should be limited to the equivalent percentage of Atmos' actual awarded revenue requirement relative to its revenue requirement request. The OCC argues that if the Company filed a rate case before the amortization period was complete, the remaining unrecovered rate case expenses should be borne by shareholders and not ratepayers. The OCC claims that the ALJ erred by rejecting all these proposals.

67. In response, Atmos argues that the OCC gave no specific justification for its recommendation to amortize rate case expenses over three years and that such an amortization period is unsupported by the historic pace of rate case filings by the Company. Atmos' approach, unlike the OCC's, would also prevent the pancaking of rate case expenses.

68. Atmos also opposes the OCC's proposal to penalize Atmos if another rate case is filed. The Company points to Decision No. R13-1307 where the ALJ hearing that rate

---

<sup>25</sup> Recommended Decision, at ¶128.

proceeding specifically rejected this proposal and went so far as to rule: “The ALJ finds the positions of OCC and Staff regarding treatment of unamortized rate case balances should Public Service file another rate case to be arbitrary and, possibly, confiscatory.”<sup>26</sup>

69. Atmos also refutes the OCC’s argument that rate case expenses should be borne, in part, by shareholders. Atmos maintains that rate case expenses are a legitimate cost of providing utility service, necessitated by Commission regulation of the utility, and the Company has a right to recovery for all reasonable operating expenses, including rate case expenses.

**b. Findings and Conclusions**

70. The Commission denies the OCC’s exceptions regarding the recovery of rate case expenses. The ALJ adopts a reasonable approach for Atmos to recover the costs incurred to complete this rate proceeding.

**E. Prepaid Pension Asset and Pension Expense**

71. In its case, Staff recommended that the Commission eliminate the inclusion of Atmos’ prepaid pension asset in its test year rate base. Staff also suggested that the Commission reduce the current balance of the asset with dollars owed to ratepayers from the Company’s “pension tracker” (approximately \$86,000) and require the Company to amortize the remaining balance (approximately \$1.1 million) over 15 years. Staff also recommended that Atmos continue using a pension tracker to ensure that ratepayers pay no more and no less than the costs of its pension expenses.

72. The Recommended Decision rejects Staff’s proposal for the Commission to remove the prepaid pension asset from Atmos’ test year rate base. The ALJ states that Staff

---

<sup>26</sup>Decision R13-1307, issued October 22, 2013, Proceeding No. 12AL-1268G, ¶ 448.



failed to satisfy its burden of proof for that recommendation and its other recommendations regarding the pension issue.<sup>27</sup>

**a. Positions of the Parties**

73. Staff argues in its exceptions that the ALJ erred in relying on Decision No. R13-1307 in accepting Atmos' position on the treatment of its prepaid pension asset. Staff requests that the Commission overturn the ALJ by requiring Atmos to eliminate the prepaid pension asset in its rate base and to reduce the current balance of the asset with dollars owed to ratepayers from the pension tracker. Further, Staff reiterates its proposal for amortizing the remaining balance of the prepaid pension asset over 15 years.

74. In response, Atmos objects to Staff's requests and supports the ALJ's determinations regarding the pension issues. Atmos notes that Proceeding No. 12AL-1268G was a gas rate case in which the parties litigated this very pension issue. Atmos concludes that the circumstances in Proceeding No. 12AL-1268G are more applicable in its rate proceeding, stating that there can be no argument that the Commission has ordered different outcomes in the past based on the specific facts presented in each separate case. Atmos also argues that Staff's reliance upon arguments made in Proceeding No. 15AL-0135G are misplaced, as several of the proposals related to the prepaid pension asset in that Public Service rate proceeding were simply unopposed.

**b. Findings and Conclusions**

75. The Commission appreciates Staff's presentation of the issues surrounding Atmos' pension trust and its explanation of the origins of the amounts booked as a prepaid

---

<sup>27</sup> Recommended Decision, at ¶113.

pension asset. The Commission also understands that it is Staff's position that Atmos should not be directed to modify its funding decision with respect to the Company's pension fund. The Commission also notes Staff's observation that Atmos' affiliated gas distribution companies do not include a prepaid pension asset in their rate base calculations.

76. Contrary to the ALJ findings regarding the prepaid pension asset in the Recommended Decision, the Commission finds that Staff has made a compelling showing that the prepaid pension asset should be removed in these circumstances from the Company's rate base so as Atmos no longer earns a return on this amount through base rates. The Commission also adopts Staff's recommendation that the Commission direct Atmos to apply the pension tracker balance of \$86,000 toward reducing the remaining value of the prepaid pension asset. The Commission further directs Atmos to amortize the remaining balance of the prepaid pension asset over 15 years. The Commission authorizes the Company to include this amortization expense in the calculation of the GRSA.

77. The Commission further agrees with the ALJ that Atmos should continue using the pension tracker to ensure that ratepayers pay no more and no less than the costs of the pension.

**F. Weather Normalization Adjustment**

78. The Recommended Decision concludes that Staff's approach for developing weather normalization adjustments to Atmos' test-year cost of service is more accurate than both the approach initially proposed by Atmos in its case and the approach advocated by the OCC.

**a. Positions of the Parties**

79. The OCC argues in its exceptions that the ALJ incorrectly rejected its proposed method for weather normalization. The OCC argues that there is a one-to-one correlation

between Heating Degree Days (HDDs) and gas consumption and that is the only appropriate statistical relationship to derive weather normalization adjustments in this rate case. The OCC argues that Staff's regression analyses support the OCC's position that the only variable that should be used to make weather normalization adjustments is the HDDs. The OCC also contends that Staff's regression analyses are statistically invalid.

80. In response, Atmos maintains that the weather normalization approach produced by Staff results in a more accurate adjustment for weather. The Company maintains that Staff's model creates the best reflection of a weather-normal year that should be used for rate making.

**b. Findings and Conclusions**

81. The Commission agrees with the ALJ and Atmos that Staff's proposed method for deriving adjustments for weather is reasonable and should be adopted for the development of rates in this proceeding. We therefore deny the OCC's exceptions on this point.

**G. Establishment of Rates and Compliance Procedures**

82. In the Recommended Decision, the ALJ directs Atmos to file a GRSA in a compliance tariff filing, where the GRSA is calculated based on the revenue requirement as calculated using the findings, conclusions, and directives in the decision. The compliance tariff filing is due within ten days of the date in which the Recommended Decision becomes a decision of the Commission and the GRSA is effective on two days' notice.

83. The ALJ also requires Atmos to file a separate GRSA for the recovery of approved rate case expense.

84. In paragraph 209 on page 76, the Recommended Decision further requires Atmos to file a revenue proof to demonstrate that the stipulated GRSA rate design approved by the ALJ will recover fully the revenue requirement adjudicated in the rate case.

85. Because the Commission stayed the Recommended Decision on January 26, 2018 by Decision No. C18-0069-I, it is necessary to establish new procedures for the implementation of rates. The compliance tariff filing requirements set forth in ¶¶ 221-223 and in the ordering paragraphs of Decision No. R18-0014, as applicable despite the stay, are set aside.

86. For clarity, the Commission upholds the approval in the Recommended Decision of the Partial Stipulation between Staff and Atmos regarding the two disputed tariff issues and the proposed consolidation of GCA Divisions.<sup>28</sup> The Commission also upholds the approval in the Recommended Decision of the Partial Settlement between Atmos, the OCC, and EOC with respect to the design of the GRSAs.<sup>29</sup> The GRSAs calculated in accordance with this Decision shall use the rate design set forth in the Partial Settlement between Atmos, the OCC, and EOC.

87. As required by Decision No. C18-0169-I, Atmos shall decrease the revenue requirement calculated in accordance with the Recommended Decision, as modified by this Decision, by \$2,102,138 to account for the annual ongoing impact of the change in federal tax law under the TCJA.<sup>30</sup>

88. Also as required by Decision No. C18-0169-I, Atmos shall make a further compliance filing within 60 days of the date the rates were established by the Recommended Decision, as modified by this Decision, are put into effect that calculates the difference between the revenues collected from customers under the provisional rates filed in Proceeding No. 18AL-0226G effective April 1, 2018 and the revenues that would have been collected as of April 1, 2018 based on the approved rates. If required, Atmos shall implement a negative rate

---

<sup>28</sup> Recommended Decision, at ¶¶197-199.

<sup>29</sup> Recommended Decision, at ¶¶202, 206, 208, and 210-211.

<sup>30</sup> Decision No. C18-0169-I, issued March 7, 2018, Proceeding No. 17AL-0429G, at ¶15.

rider to return any over-collection to customers over a time period equal to the length of time the provisional rates were in effect (rounded to the nearest whole month) with interest calculated at the average bank loan prime rate report by the Federal Reserve.<sup>31</sup>

## II. ORDER

### A. The Commission Orders That:

1. Decision No. R18-0014, issued on January 8, 2018, is adopted as modified by this Decision, consistent with the discussion above.
2. The Exceptions to Decision No. R18-0014 filed by Atmos Energy Corporation (Atmos) on March 7, 2018 are denied, consistent with the discussion above.
3. The Exceptions to Decision No. R18-0014 filed by the Staff of the Colorado Public Utilities Commission (Staff) on March 7, 2018 are granted, in part, and denied, in part, consistent with the discussion above.
4. The Exceptions to Decision No. R18-0014 filed by the Colorado Office of Consumer Counsel on March 7, 2018 are granted, in part, and denied, in part, consistent with the discussion above.
5. The Motion for Leave to File Response to Atmos Energy Corporation's Response to Exceptions filed by Staff on March 23, 2018 is denied.
6. The effective date of the tariff sheets filed by Atmos on June 26, 2017 with Advice Letter No. 530 is permanently suspended and shall not be further amended.
7. The tariff sheets filed with Advice Letter No. 530 are permanently suspended and shall not be further amended.

---

<sup>31</sup> Decision No. C18-0169-I, issued March 7, 2018, Proceeding No. 17AL-0429G, at ¶17.

8. Atmos shall file tariff sheets to implement General Rate Schedule Adjustments authorized by Decision No. R18-0014, as modified by this Decision, and by Decision No. C18-0169-I addressing the incorporation of the impacts of the Tax Cut and Jobs Act of 2017 into Atmos' rates, consistent with the discussion above. Atmos also shall file the modified tariff for its System Safety and Integrity Rider consistent with the approvals and directives in Decision No. R18-0014.

9. Atmos shall file an advice letter compliance filing to modify its tariff sheets in a separate proceeding and on not less than two business days' notice. The advice letter and tariffs ordered herein shall comply with all applicable rules. In calculating the proposed effective dates, the date the filing is received at the Commission is not included in the notice period and the entire notice period must expire prior to the effective date. The advice letters and tariffs must comply in all substantive respects to this Decision in order to be filed as a compliance filing on shortened notice.

10. The 20-day period provided for in § 40-6-114, C.R.S., within which to file applications for rehearing, reargument, or reconsideration, begins on the first day following the effective date of this Decision.

11. This Decision is effective upon its Mailed Date.

**B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING  
April 4, 2018.**

( S E A L )



ATTEST: A TRUE COPY

Doug Dean,  
Director

THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO

JEFFREY P. ACKERMANN

---

FRANCES A. KONCILJA

---

Commissioners

COMMISSIONER WENDY M. MOSER  
DISSENTING.

**III. COMMISSIONER WENDY M. MOSER DISSENTING**

**A. Authorized Return on Equity (ROE)**

1. I am in agreement with the majority and with the Administrative Law Judge (ALJ) (based on the evidence in the record and the proper exercise of judgment regarding the results and impact on rates), that a reasonable range for the authorized ROE for Atmos Energy Corporation (Atmos) extends from 9.3 to 9.9 percent. This range satisfies the standards articulated in *Bluefield Waterworks and Improvement Co. v. Public Service Comm'n of West Virginia*, 262 U.S. 679 (1923) and *Federal Power Comm'n v. Hope Natural Gas Co.*, 320 U.S. 591 (1944). The range established therefore excludes the request by Atmos for a 90 basis point increase to 10.5 percent as well as the 70 basis point decrease to the 9.0 percent level advocated by Staff and the OCC.

2. However, based on the ALJ's reliance in the record on changing macroeconomic conditions primarily based upon the Federal Reserve's monetary policy normalization activity over the last year or so, I disagree with the majority's decision to lower Atmos' ROE from its existing level of 9.6 percent. The ROE trend is going up, not down.<sup>32</sup> Thus, I am convinced that a moderate increase to the ROE level, as recommended by the ALJ, is appropriate. In summary, in consideration of the possibility of increasing interest rates under expected federal monetary policy, I find that the ALJ properly narrowed the breadth of the just and reasonable values for the point estimates of the authorized ROE to 9.7 percent for calculating rates, finding persuasive the ALJ's characterization of the record on the ROE issues.

3. If one recognizes that the Company's most recent 9.6 percent ROE was an approved ROE by a prior Commission, and now, almost three years later, the record shows that ROEs are trending upward, the logical conclusion should be that the ROE should trend upward, or at a minimum, stay at the same level. The majority points to no persuasive rationale or evidence that explains why a lower ROE would be warranted, nor does it identify why its chosen level of 9.45 percent is appropriate. In addition, despite the majority agreeing with the ALJ that Atmos has sustained a stable and strong credit rating that has afforded it reasonable access to capital<sup>33</sup> at its authorized ROE of 9.6 percent, the majority found that a reduced ROE would be appropriate. Without articulating its reasoning, nor setting forth supporting rationale for that

---

<sup>32</sup> See Mr. D'Ascendis' Rebuttal Testimony, page 37. In paragraph 146 of his recommended decision, the ALJ referred to Mr. D'Ascendis citation to Hearing Exhibit 512, which shows that the average authorized ROE for natural gas utilities in 2017 is 9.78 percent, while the average authorized ROE for litigated matters in 2017 is 9.89 percent.

<sup>33</sup> Capital that will be needed as Atmos goes forward with its capital intensive plan to replace miles of bare steel and PVC mains.



specific rate, the majority settled on an ROE of 9.45 percent, a specific rate that was not proposed by any party.

4. At a minimum, when we as a Commission decide to make changes to an ALJ's recommended decision, we should point to specific facts, errors, reasoning, and/or changed circumstances that warrant those changes and explain how we arrived at the rate levels that we order. The majority fails to both articulate why it rejected the upward ROE trend evidence, and why it lowered the current 9.6 percent ROE.

5. Accordingly, I dissent from the majority opinion on the issue of the proper ROE to be awarded Atmos for the purpose of setting customer rates.

THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO

WENDY M. MOSER

---

Commissioner

**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

Before Commissioners: Susan K. Duffy, Chair  
Shari Feist Albrecht  
Dwight D. Keen

In the Matter of the Application of Atmos )  
Energy Corporation for Adjustment of its ) Docket No. 19-ATMG-525-RTS  
Natural Gas Rates in the State of Kansas. )

**ORDER ON ATMOS ENERGY CORPORATION'S APPLICATION  
FOR A RATE INCREASE**

This matter comes before the State Corporation Commission of the State of Kansas (Commission). Having reviewed the pleadings and record, the Commission makes the following findings:

1. On June 28, 2019, Atmos Energy Corporation (Atmos) filed an Application seeking an overall net revenue increase of \$7.2 million, resulting from increasing base rates by \$9.6 million, proposing a rate case expense surcharge of \$817,882, rebasing amounts currently collected through the Gas System Reliability Surcharge Rider (GSRS) of \$3.3 million; and adjusting \$1.4 million of its Ad Valorem Tax Surcharge Rider (AVTS) into base rates.<sup>1</sup>
2. Atmos claims their current rates do not produce sufficient revenues to cover the costs to render reasonably sufficient and efficient service and, therefore, are not just and reasonable.<sup>2</sup> Without the proposed rate increase, Atmos contends it will be unable to acquire necessary capital at reasonable rates, carry out new construction, provide adequate gas supplies of gas and render the quality of service the public requires.<sup>3</sup> Atmos's Application is accompanied by supporting testimony from eight witnesses.<sup>4</sup>

---

<sup>1</sup> Application, June. 28, 2019, ¶ 4.

<sup>2</sup> *Id.*, ¶ 5.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*, ¶ 4.

3. The Commission has jurisdiction to supervise and control natural gas public utilities, as defined in K.S.A. 66-104, doing business in Kansas.<sup>5</sup> The Commission has the power to require all natural gas utilities governed by the Natural Gas Public Utilities Act to establish and maintain just and reasonable rates.<sup>6</sup>

4. Notice of the proposed rate increase, public hearing, and evidentiary hearing was provided by an insert with the monthly billing statement for each customer in Atmos's service territory as well as by publishing notice in the major newspapers in the region. The Commission received comments from the public at the September 17, 2019 public hearing in Overland Park, Kansas, where a record was made. The Commission also received 527 public comments through its Office of Public Affairs and Consumer Protection.<sup>7</sup> The Commission issues this Order with due consideration of those comments.

5. On July 25, 2019, the Citizens' Utility Ratepayer Board (CURB) was granted intervention.

6. On October 31, 2019, Commission Staff (Staff)<sup>8</sup> and CURB filed their direct testimony. In its direct testimony, Staff recommended a net revenue decrease of \$593,764; CURB recommended a net revenue decrease of \$3,157,324.<sup>9</sup>

7. On November 18, 2019, Atmos filed rebuttal testimony from eight witnesses. James F. Reda and John D. Quackenbush filed rebuttal testimony without having filed direct testimony. Reda's testimony focused on the reasonableness of total compensation levels for

---

<sup>5</sup> K.S.A. 66-1,201.

<sup>6</sup> K.S.A. 66-1.202.

<sup>7</sup> The public comments were entered into the record by the Prehearing Officer filing Notice of Filing of Public Comments on Dec. 18, 2019.

<sup>8</sup> Staff served the Direct Testimony of Justin T. Grady and Adam H. Gatewood on all parties via email on October 31, 2019. Due to a clerical error neither Grady's nor Gatewood's testimony was filed by 5:00 p.m. on October 31, 2019. On November 14, 2019, the Commission granted Staff's Motion for Leave to File Testimony Out of Time.

<sup>9</sup> Post-Hearing Brief of Commission Staff (Staff Brief), Jan. 16, 2020, ¶¶ 5, 6.

executives and the appropriateness of Atmos's annual and long-term incentive compensation programs.<sup>10</sup> Quackenbush's rebuttal testimony discussed the alternative regulatory mechanisms he approved for natural gas companies while he chaired the Michigan Public Service Commission,<sup>11</sup> and opined on the importance of Regulatory Research Associates' (RRA) assessments of state regulatory climates.<sup>12</sup>

8. The Parties were unable to reach a settlement, so the Commission held an evidentiary hearing, beginning December 10, 2019, and concluding December 12, 2019. Atmos, Staff, and CURB appeared by counsel and each party submitted prefiled testimony. The Commission heard live testimony from a total of 20 witnesses, including nine on behalf of Atmos, seven on behalf of Staff, and four on behalf of CURB. At the December 3, 2019 prehearing conference, the parties agreed to waive cross-examination of several witnesses. The parties had the opportunity to cross-examine the remaining witnesses at the evidentiary hearing as well as the opportunity to redirect their own witnesses. Following the evidentiary hearing, all of the parties submitted post-hearing briefs.

9. The major issues in dispute are:

- Return on Equity (ROE) / Capital Structure
- System Integrity Plan (SIP)
- Incentive Compensation
- Depreciation
- Rate case expense
- Other rate base and income statement adjustments

---

<sup>10</sup> Rebuttal Testimony of James F. Reda, Nov. 18, 2019, p. 3.

<sup>11</sup> Rebuttal Testimony of John D. Quackenbush, CFA (Quackenbush Rebuttal), Nov. 18, 2019, p. 12.

<sup>12</sup> *Id.*, pp. 14-15.

10. In determining rates, the Commission first establishes a revenue requirement and then designs a rate structure.<sup>13</sup> The revenue requirement includes rate base, operating expenses, and rate of return.<sup>14</sup> The rate of return is simply an opportunity to earn that rate, not a guarantee. Rate design includes allocating costs among and within the customer classes.

11. In setting rates, the Commission's goal is to balance the interests of all concerned parties and develop a rate within the "zone of reasonableness."<sup>15</sup> The parties whose interests must be considered and balanced include: (1) the utility's investors vs. the ratepayers; (2) present vs. future ratepayers; and (3) the public interest.<sup>16</sup>

12. In allocating the revenue requirement among the customer classes, the Commission follows cost causation principles,<sup>17</sup> so "that one class of consumers shall not be burdened with costs created by another class."<sup>18</sup>

#### A. RETURN ON EQUITY

13. Atmos initially proposed an ROE of 10.25%, with an overall rate of return of 7.98%.<sup>19</sup> Its witness, Dylan D'Ascendis, reached his ROE recommendation after applying several cost of common equity models, including the Discounted Cash Flow (DCF) model, the Risk Premium Model (RPM), and the Capital Asset Pricing Model (CAPM), to a proxy group of six natural gas distribution utilities and a separate proxy group of sixteen domestic, non-price regulated companies of comparable risk to the six natural gas companies.<sup>20</sup> D'Ascendis's models produced an ROE of 9.8% before he adjusted it upward by 0.40% for the small size of Atmos

---

<sup>13</sup> *Kansas Gas & Elec. Co. v. Kansas Corp. Comm'n*, 239 Kan. 483, 500 (1986).

<sup>14</sup> *Id.* at pp. 500-01.

<sup>15</sup> *Id.* at pp. 488-89.

<sup>16</sup> *Id.* at pp. 488, 1070.

<sup>17</sup> *See* Order on Petitions for Reconsideration and Clarification, ¶¶ 14-15, Docket No. 05-WSEE-981-RTS (Feb. 13, 2006).

<sup>18</sup> *Jones v. Kansas Gas & Elec. Co.*, 222 Kan. 390, 401 (1977).

<sup>19</sup> Direct Testimony of Dylan W. D'Ascendis (D'Ascendis Direct), June 28, 2019, p. 2.

<sup>20</sup> *Id.*, p. 3.

Kansas's operations and another 0.04% for flotation costs to arrive at an ROE of 10.24%.<sup>21</sup> Inexplicably, D'Ascendis's rounded up to 10.25% to reach his initial recommendation.<sup>22</sup>

14. CURB's witness, Dr. J. Randall Woolridge, applied the DCF and CAPM to his own proxy group of gas distribution companies and concluded Atmos's ROE is in the range of 7.50% to 8.70%,<sup>23</sup> ultimately recommending an ROE of 8.7%.<sup>24</sup>

15. Staff recommends an ROE of 9.1%, with a range of 8.55% to 9.35%.<sup>25</sup> Staff witness Adam Gatewood's ROE of 9.1% results in an overall rate of return of 7.02%.<sup>26</sup> Gatewood performed DCF, Internal Rate of Return (IRR), and CAPM analyses using D'Ascendis's proxy group.<sup>27</sup> He relied on a DCF model using both short-term and long-term growth rate forecasts to arrive at a midpoint ROE of 8.15%.<sup>28</sup> Applying long-term growth rate forecasts to D'Ascendis's proxy group is one explanation for why Gatewood's recommended ROE is lower than D'Ascendis's.

16. In his rebuttal testimony, D'Ascendis lowered his initial ROE recommendation from 10.25% to 9.9%,<sup>29</sup> based on an extraordinary decline in interest rates since he filed his direct testimony.<sup>30</sup> In his revised ROE recommendation, D'Ascendis starts with an ROE of 9.45% before applying a 0.40% upward size adjustment and a 0.03% flotation cost adjustment to arrive at his 9.9% ROE recommendation.<sup>31</sup>

---

<sup>21</sup> *Id.*, p. 4.

<sup>22</sup> *Id.*

<sup>23</sup> Direct Testimony of J. Randall Woolridge, Ph.D. (Woolridge Direct), Oct. 31, 2019, p. 4.

<sup>24</sup> *Id.*, p. 58.

<sup>25</sup> Direct Testimony of Adam Gatewood (Gatewood Direct), Nov. 5, 2019, p. 2.

<sup>26</sup> *Id.*, p. 2. Gatewood's 7.02% overall rate of return is based on a 4.35% cost of debt. *See id.*, p. 3. Applying the 4.37% cost of debt the Commission adopts in paragraph 29 of this Order increases his overall rate of return to 7.03%.

<sup>27</sup> Staff Brief, ¶¶ 16-18.

<sup>28</sup> *Id.*, ¶ 17.

<sup>29</sup> Rebuttal Testimony of Dylan W. D'Ascendis (D'Ascendis Rebuttal), Nov. 18, 2019, p. 2.

<sup>30</sup> *Id.*, p. 5.

<sup>31</sup> *Id.*, p. 4.

17. In determining the appropriate ROE, the Commission is guided by *Federal Power Commission v. Hope Natural Gas Company*, 320 U.S. 591 (1944) and *Bluefield Waterworks & Improvement Company v. Public Service Commission of West Virginia*, 262 U.S. 679 (1923) which find returns granted to regulated public utilities should be: (1) commensurate with returns on investment of similar risk; (2) sufficient to ensure the utility's financial integrity under proper management; and (3) adjusted to reflect changes in the money market and business conditions.<sup>32</sup> *Hope* and *Bluefield* have been adopted by the Kansas Supreme Court<sup>33</sup> and recognized by the Commission in Docket No. 10-KCPE-415-RTS (10-415 Docket).<sup>34</sup> While the Commission has substantial discretion in setting a fair rate of return, it must not be so unreasonably high or low as to be unlawful.<sup>35</sup>

18. Even after amending its proposed ROE in recognition of an extraordinary decline in interest rates, Atmos's proposed 9.9% ROE represents an increase of 80 basis points from its currently approved ROE of 9.1%.<sup>36</sup> Both Gatewood and Woolridge testified that there has been a clear downward trend in authorized ROEs for gas and electric utilities from 2000 to 2018.<sup>37</sup> Even Atmos acknowledges an overall downward trend in interest rates since 2008.<sup>38</sup> Atmos is the only party advocating an increase to its 9.1% ROE. Atmos's proposed ROE runs counter to the trends in Kansas and nationwide towards lower ROEs in recognition of historically low costs of capital.

---

<sup>32</sup> *Federal Power Comm'n v. Hope Natural Gas Co.*, 320 U.S. 591, 603, 64 S.Ct. 281, 288 (1944); *Bluefield Waterworks & Improvement Co. v. Public Service Comm'n of West Virginia*, 262 U.S. 679, 692-93, 43 S.Ct. 675, 679 (1923).

<sup>33</sup> *Kansas Gas*, 239 Kan. at pp. 489-90.

<sup>34</sup> Order: 1) Addressing Prudence; 2) Approving Application, In Part; and 3) Ruling on Pending Requests (10-415 Order), pp. 40-41, Docket No. 10-KCPE-415-RTS (Nov. 22, 2010).

<sup>35</sup> *Southwestern Bell Tel. Co. v. Kansas Corp. Comm'n*, 192 Kan. 39, 85-86 (1963).

<sup>36</sup> See Gatewood Direct, p. 30.

<sup>37</sup> Transcript of Evidentiary Hearing (Tr.), Dec. 10, 2019, Vol. 1, p. 48 (Woolridge); *id.*, pp. 159-160 (Gatewood).

<sup>38</sup> D'Ascendis Rebuttal, pp. 5-6.

19. On cross-examination, D'Ascendis admits that the only model that produces a 9.9% ROE applies to companies that are not price/rate regulated with adjustments for company size and equity flotation.<sup>39</sup> Yet, D'Ascendis is unaware of any instance where the Commission has recognized a size adjustment in setting an ROE.<sup>40</sup> With an equity market capitalization of \$11.4 billion, Atmos is hardly a small company.<sup>41</sup> Staff questioned the appropriateness for a size adjustment because an investor cannot purchase stock specific to Atmos's Kansas operations nor can anyone purchase debt specific to Atmos's Kansas operations.<sup>42</sup>

20. As Quackenbush testified, Atmos Kansas makes up only about 4% of Atmos's operations, so when investors contemplate investing in Atmos, they focus on states like Texas, Mississippi and Louisiana that make up the lion's share of Atmos's operations, and therefore, the regulatory risk that exists in those three states more significantly impacts Atmos's ability to attract capital.<sup>43</sup> Similarly, Quackenbush admits that Atmos is not currently experiencing any difficulty raising capital,<sup>44</sup> as evidenced by its ability to recently issue \$800 million in 10-year and 30-years notes with a yield of 2.625 and 3.375 percent, respectively.<sup>45</sup> Based on these admissions, there is no justification for a size adjustment to ROE.

21. Atmos has not met its burden to demonstrate its existing 9.1% ROE is hindering its ability to raise capital, or insufficient to ensure the utility's financial integrity under proper management.

22. At the same time, CURB's recommended ROE range of 7.50% to 8.70% strikes the Commission as too low. Woolridge's recommended ROE is significantly below Atmos's current

---

<sup>39</sup> Tr., Vol. 1, pp. 86-87.

<sup>40</sup> *Id.*, p. 93.

<sup>41</sup> Gatewood Direct, p. 24.

<sup>42</sup> *Id.*, p. 103.

<sup>43</sup> *Id.*, p. 217.

<sup>44</sup> *Id.*

<sup>45</sup> *Id.*, p. 218.



authorized ROE and is even further below the average rates of return being allowed to natural gas utilities. As D'Ascendis testified, since 2018, the average and median authorized ROEs for natural gas utilities are 9.63% and 9.7% respectively.<sup>46</sup>

23. An ROE of 9.1%, as recommended by Staff, is below that requested by Atmos, and above that recommended by CURB. The current Baa Corporate Bond yield of 4.5%<sup>47</sup> is actually lower than the 4.89% yield in place during the 14-ATMG-320-RTS Docket, (the last time the Commission set Atmos's ROE).<sup>48</sup> Since capital costs have declined since the Commission set the 9.1% ROE, the 80 basis points increase sought by Atmos is not justified. Having reviewed the evidence provided by D'Ascendis, Woolridge, and Gatewood, the Commission believes an ROE of 9.1% strikes the proper balance of allowing Atmos to access capital markets while acknowledging the economic impact of higher ROEs on ratepayers.

## B. CAPITAL STRUCTURE

24. D'Ascendis recommends using Atmos's actual capital structure as of March 31, 2019 to develop the overall rate of return.<sup>49</sup> Therefore, he proposes a capital structure consisting of 39.88% long-term debt and 60.12% common equity.<sup>50</sup> D'Ascendis testified that since a 60.12% equity ratio is within the range of common equity ratios of other utility proxy group members, it would be inappropriate to substitute a hypothetical capital structure.<sup>51</sup>

25. Both Staff and CURB recommend a capital structure of 43.68% long-term debt and 56.32% common equity.<sup>52</sup> Woolridge testified that Atmos's proposed capital structure has more equity than the rest of the gas proxy members and should be adjusted to reflect the issuance of

---

<sup>46</sup> D'Ascendis Rebuttal, p. 47.

<sup>47</sup> Gatewood Direct, p. 32.

<sup>48</sup> *Id.*, p. 30.

<sup>49</sup> D'Ascendis Direct, p. 10.

<sup>50</sup> *Id.*

<sup>51</sup> *Id.*, p.21.

<sup>52</sup> Gatewood Direct, p. 17; Woolridge Direct, p. 24.

\$800 million in senior notes on October 2, 2019.<sup>53</sup> Gatewood agrees that Atmos's proposed capital structure should be adjusted to reflect Atmos's issuance of \$800 million in unsecured debt.<sup>54</sup> As Gatewood explained, the new debt issuance increases the balance of Atmos's long-term debt by 22% and since the debt bears a lower interest rate than the interest rate from the test-year, a lower rate of return is appropriate.<sup>55</sup> Gatewood testified that since Atmos has already issued the debt, adjusting its capital structure to reflect the debt is known and measurable and presents a better estimate of Atmos's actual costs going forward.<sup>56</sup>

26. On rebuttal, D'Ascendis argued that if the Commission elects to update the capital structure for post-test year events, it should also adjust the capital structure for all known and measurable post-test year events, including Atmos's two planned equity issuances in 2020, which would result in a capital structure of 58.22% common equity and 41.78% long-term debt.<sup>57</sup> Both Staff and CURB oppose including Atmos's planned 2020 equity issuances in the capital structure. CURB explains that those issuances were not raised in the evidentiary hearing and are not known and measurable.<sup>58</sup> Staff notes the adjustment related to the 2020 issuances is over a year removed from the test year and is not known and measurable.<sup>59</sup>

27. Atmos's concerns that factoring in the 2019 issuances, but not the planned 2020 offerings, would violate the principles of synchronization are not compelling. As Staff points out, all of the other adjustments, including those to plant in service and payroll, are not updated beyond September 30, 2019.<sup>60</sup> Staff argues the Commission should not adopt capital structure that was

---

<sup>53</sup> *Id.*, p. 23.

<sup>54</sup> Gatewood Direct, p. 17.

<sup>55</sup> *Id.*

<sup>56</sup> *Id.*

<sup>57</sup> D'Ascendis Rebuttal, p. 14; Post Hearing Brief of Atmos Energy Corporation (Atmos Brief), Jan. 3, 2020, ¶ 23.

<sup>58</sup> Post-Hearing Brief of the Citizens' Utility Ratepayer Board (CURB Brief), Jan. 15, 2020, ¶ 26.

<sup>59</sup> Staff Brief, ¶ 40.

<sup>60</sup> *Id.*, ¶ 42.

updated during the hearing, including projected equity issuances that will not be finalized until 2020, and would not be synchronized with all of the other major elements of Staff's revenue requirement.<sup>61</sup> The Commission agrees.

28. Based on Gatewood's testimony that Atmos used the 2019 new debt to refinance existing short-term debt, rather than replacing long-term debt already accounted for in its long-term debt balances in the test year,<sup>62</sup> the Commission concludes the new debt is not be used to finance new plant and equipment outside of staff's update cutoff.

29. Including the new debt incurred in October 2019 has a significant effect on the Atmos's annual Gas Safety & Reliability Surcharge (GSRS) calculations, which are dependent on the rate of return set in this Docket.<sup>63</sup> Accordingly, failure to include the new debt from 2019 would result in customers paying higher GSRS charges based on an inflated rate of return.<sup>64</sup> This would result in shareholders, rather than customers receiving the benefit of cost savings from the new debt incurred in 2019.<sup>65</sup> Staff's recommended capital structure is within the 50% to 60% equity ratio range targeted by Atmos management.<sup>66</sup> Staff's proposed capital structure is within the range approved in Atmos's other divisions.<sup>67</sup> Therefore, the Commission approves the capital structure of 43.68% long-term debt and 56.32% common equity recommended by Staff and CURB. The parties agree that a 4.37% embedded debt cost is appropriate in this proceeding.<sup>68</sup> Accordingly, the Commission adopts a 4.37% debt cost in this proceeding.

---

<sup>61</sup> *See id.*

<sup>62</sup> Gatewood Direct, p. 18.

<sup>63</sup> Staff Brief, ¶ 36.

<sup>64</sup> *Id.*

<sup>65</sup> *Id.*

<sup>66</sup> *Id.*, ¶ 37.

<sup>67</sup> *Id.*, ¶ 38.

<sup>68</sup> Atmos Brief, p. 12, n. 27.

### C. SYSTEM INTEGRITY PLAN (SIP)

30. Atmos proposes a five-year pilot, SIP tariff to allow it to accelerate its replacement of obsolete materials in its Kansas underground pipes.<sup>69</sup> In its Post Hearing Brief, Atmos characterizes its proposed SIP as “essentially the same SIP mechanism agreed to by Atmos Energy, Staff, and CURB in Atmos Energy's last general rate case proceeding in the [16-ATMG-079-RTS] docket with one exception; the stipulated SIP in the 079 docket provided for a semi-annual rather than quarterly rate adjustments”<sup>70</sup> That characterization is misleading.

31. On cross-examination, Gary W. Gregory, Atmos’s President of its Colorado and Kansas Division, admitted that the current SIP proposal does not include a \$75 million cap over five years that was part of the SIP mechanism proposed in the 16-ATMG-079-RTS Docket (16-079 Docket).<sup>71</sup> Similarly, Gregory acknowledged the current SIP proposal does not include the three-year rate moratorium that was a condition of the SIP mechanism from the 16-079 Docket.<sup>72</sup>

32. In 2008, Kansas enacted a monthly Gas System Reliability Surcharge (GSRS) charge to allow natural gas utilities to invest in system integrity and to assist in complying with federal and state safety standards.<sup>73</sup> In 2018, the Kansas Legislature amended the Gas Safety and Reliability Policy Act, doubling the maximum monthly Gas System Reliability Surcharge (GSRS) charge on residential customers from \$0.40 to \$0.80.<sup>74</sup>

33. Atmos contends that the GSRS process produces an 11-month capital investment lag and does not cover the entire cost of investment for system integrity.<sup>75</sup> Therefore, Atmos believes a SIP mechanism is necessary. Both Staff and CURB oppose the proposed SIP. As Staff

---

<sup>69</sup> Application, ¶ 8.

<sup>70</sup> Atmos Brief, ¶ 31.

<sup>71</sup> Tr., Vol. 2, p. 257.

<sup>72</sup> *Id.*, p. 264.

<sup>73</sup> Direct Testimony of Gary L. Smith (Smith Direct), June 28, 2019, p. 9.

<sup>74</sup> K.S.A. 66-2204(e)(1); *See also* Smith Direct, p. 9.

<sup>75</sup> Smith Direct, p. 9.

witness Justin Grady testified, Atmos is fully recovering its investments in safety and reliability infrastructure today through the newly expanded GSRS.<sup>76</sup>

34. Staff recommends modifications to Atmos's proposed SIP: (1) capping the recovery of costs of incremental capital improvement at \$50 million over five years; (2) beginning on January 1, 2021, and expiring on December 31, 2025; (3) requiring Atmos to file detailed annual SIP Plan Filings to be ruled on by the Commission each November 1; (4) requiring Atmos to make an annual surcharge filing by January 15, each year, with the first being due January 15, 2022; (5) providing only a return on and a return of capital expenditures above the \$22 million per year in base safety, reliability, and GSRS-eligible capital expenditures; (6) requiring Atmos to file to renew, amend, or end the program by December 31, 2024; and (7) be accompanied by a three-year rate moratorium.<sup>77</sup>

35. Similarly, CURB explained it would be more amenable to the SIP if it would be: (1) used only after its GSRS is exhausted; (2) used only after taking advantage of depreciation; (3) limited to replacing cast iron or base steel pipeline; (4) updated annually; (5) limited to the monthly surcharge on residential customers to \$0.40 per month; and (6) accompanied by a three-year rate moratorium.<sup>78</sup> The major difference between Staff's and CURB's proposed modifications is the size of cap.<sup>79</sup> Staff proposes a \$50 million cap over the five-year pilot program, where CURB's proposal to limit the monthly surcharges equates to roughly a \$35 million cap over the five-year period.<sup>80</sup>

---

<sup>76</sup> Direct Testimony of Justin T. Grady, Nov. 4, 2019, p. 15.

<sup>77</sup> *Id.*, pp. 28-29.

<sup>78</sup> CURB Brief, ¶ 40.

<sup>79</sup> *Id.*, ¶ 41.

<sup>80</sup> *Id.*

36. In its Reply Brief, Atmos continues to misstate the character of its proposed SIP. Atmos makes the remarkable claim that, “[f]rom the Company’s perspective, it proposed a SIP tariff that was virtually identical to the tariff agreed to between Atmos Energy, Staff, and CURB in the last Atmos Energy rate case and supported by the Staff and the Company in the 343 docket. The only difference is that Atmos Energy proposed a quarterly surcharge mechanism in this docket rather than a semi-annual surcharge mechanism.”<sup>81</sup> Atmos then offers up a revised SIP that was not presented to the Commission until after the evidentiary hearing.

37. Under its revised SIP, Atmos proposes a semi-annual surcharge mechanism with a \$35 million cap over five years.<sup>82</sup> Atmos’s revised SIP appears to address the vast majority of both Staff’s and CURB’s concerns. The only matter remaining in dispute is the timing of the surcharge. By proposing a semi-annual mechanism, Atmos appears to abandon its initial request for a quarterly surcharge mechanism. At the very least Atmos’s proposal proves it does not believe a quarterly surcharge is necessary. Atmos offers no evidence to support a semi-annual surcharge. Instead it simply states, “both Staff and Atmos Energy indicated they could live with a semi-annual surcharge mechanism which was the arrangement incorporated into the 079 settlement.”<sup>83</sup> That statement does not provide sufficient justification for the Commission to adopt a semi-annual surcharge. Nor does it recognize the important elements of the 16-079 Docket settlement still missing from Atmos’s proposal, notably a three year rate moratorium. Therefore, even though the 16-079 Docket settlement contained a semi-annual surcharge, that is not compelling evidence that a SIP should be collected on a semi-annual basis.

---

<sup>81</sup> Reply Brief of Atmos Energy Corporation (Atmos Reply Brief), Jan. 24, 2020, ¶ 19.

<sup>82</sup> *Id.*, Attachment A, p. 1.

<sup>83</sup> Atmos Reply Brief, p. 18.

38. Both Staff and CURB have supported an annual surcharge. Staff's and CURB's recommendations are supported by testimony from Justin Grady and Josh Frantz respectively. Furthermore, an annual surcharge is consistent with how the GSRS is collected. An annual surcharge is also less burdensome for the Commission and its Staff to administer. Since there is no evidence to support Atmos's revised semi-annual surcharge, and based on Atmos's acknowledgment that if the SIP mechanism was denied, it would continue to use the existing rate recovery options, such as the GSRS or rate cases, and more importantly, it would continue to spend and invest in its system and address safety issues without any pause, the Commission denies Atmos's proposed, modified SIP.

39. Both Staff and Atmos favor increasing the pace for replacing obsolete infrastructure.<sup>84</sup> The real dispute between the Staff and Atmos is the method of cost recovery.<sup>85</sup> The Commission is not opposed to a SIP in principle, just the SIP as originally proposed by Atmos. The Commission recognizes the urgent need to replace obsolete pipes, primarily bare steel and cast iron. Therefore, the Commission would approve the amended SIP proposed by Atmos in its Reply Brief, provided it includes: (1) an annual surcharge as suggested by CURB and Staff for replacing obsolete pipes, primarily bare steel and cast iron, and (2) is available only after its GSRS is exhausted; and (3) Atmos accepts a three-year rate moratorium. If after exhausting its GSRS, Atmos wishes to pursue a SIP including a \$35 million cap over five years, with an annual surcharge, and a three-year rate moratorium, the Commission urges Atmos to collaborate with CURB and Staff to make a compliance filing, in accord with these conditions through a SIP tariff.

---

<sup>84</sup> *Id.*, p. 280.

<sup>85</sup> *Id.*, p. 281.

#### D. INCENTIVE COMPENSATION

40. Atmos claims its employee compensation plan supports and rewards high-performance by its employees, which benefits all stakeholders.<sup>86</sup> Staff recommends removing 100% of Atmos's short term Management Incentive Plan expenses, 50% of the time lapse portion of the Long Term Incentive Plan, and 100% of the expense associated with the Performance Based portion of the Long Term Incentive Plans allocated to Atmos's Kansas operations.<sup>87</sup> CURB recommends removing 100% of Atmos's compensation expenses beyond base salary.<sup>88</sup> Atmos contends that because its total compensation for employees (base pay plus incentive pay) is prudent and reasonable based upon those total salaries being below or at the total salaries paid in the market for similar positions, they should be recovered in rates.<sup>89</sup>

41. Atmos retained James F. Reda, who filed rebuttal testimony on the reasonableness of Atmos's total compensation levels, the competitiveness of Atmos's total compensation program, and the inclusion of incentive compensation in Atmos's cost of service.<sup>90</sup> In his prefiled rebuttal testimony, Reda states that Atmos's compensation levels compare favorably with the competitive market.<sup>91</sup> He reaches that conclusion because Atmos's compensation programs are at the 50<sup>th</sup> percentile of the marketplace and the incentive programs are tied to financial performance, which benefits all stakeholders.<sup>92</sup>

42. Despite Reda's concern that Atmos would not be able to retain qualified employees without its executive compensation program, on cross-examination, Reda admitted he did not conduct any studies on whether Atmos's ability to attract capital would be affected if the

---

<sup>86</sup> Atmos Post Hearing Brief, ¶ 51.

<sup>87</sup> Staff Brief, ¶ 86.

<sup>88</sup> CURB Brief, ¶ 75.

<sup>89</sup> Atmos Brief, ¶ 43(c).

<sup>90</sup> Rebuttal Testimony of James F. Reda, Nov. 18, 2019, p. 3.

<sup>91</sup> *Id.*, p. 8.

<sup>92</sup> *Id.*, p. 28.



Commission disallowed the incentive compensation programs in rates.<sup>93</sup> Similarly, he failed to conduct any surveys of Atmos executives to measure potential turnover if the Commission disallowed the incentive compensation programs in rates.<sup>94</sup>

43. Furthermore, even if the Commission excludes Atmos's compensation plans from rates, the evidence suggests Atmos's shareholders will gladly finance those programs. In his prefiled rebuttal testimony, Reda notes that in 2018, 94% of Atmos's shareholders approved the Company's compensation structure.<sup>95</sup> He argues the shareholder approval demonstrates the executive compensation structure adds value to shareholders and customers.<sup>96</sup> But when asked during cross-examination whether he believes the shareholders vote was influenced by whether they expect ratepayers to bear those costs, Reda answered no.<sup>97</sup> Likewise, when asked if he thought shareholders were concerned with who might be paying for these plans, he again answered no.<sup>98</sup> This is despite the evidence in the record that most of Atmos's jurisdictions disallow some portion of incentive compensation.<sup>99</sup> Therefore, Atmos's own expert implicitly acknowledges that its shareholders are willing to bear the cost of the incentive programs. Accordingly, there is no reason to burden ratepayers with costs, as shareholders have shown are perfectly willing to fund the incentive programs. If shareholders pay for the incentive programs, the incentive programs will continue to allow Atmos to recruit and retain valued employees.

44. Staff does not claim Atmos's compensation levels are unreasonable or imprudent; instead Staff believes Atmos's compensation metrics are too heavily weighted towards its financial

---

<sup>93</sup> Tr., Vol. 3, p. 549.

<sup>94</sup> *Id.*, p. 550.

<sup>95</sup> Reda Rebuttal, p. 4.

<sup>96</sup> *Id.*

<sup>97</sup> Tr. Vol. 3, p. 551.

<sup>98</sup> *Id.*, p. 552.

<sup>99</sup> Tr., Vol. 3, p. 556.

goals.<sup>100</sup> Staff relies on the Commission's Order in the 10-415 Docket, where the Commission announced its intent to exclude programs that focus on the financial aspect, rather than operational aspects of the business,<sup>101</sup> to argue Atmos's programs should be disallowed. According to Staff, since the 10-415 Docket was issued, the Commission has repeatedly affirmed its decision, notably in the 12-KCPE-764-RTS Docket (12-764 Docket).<sup>102</sup> Therefore, Staff believes the policy to disallow incentive programs that focus on the financial benefits to the utility is settled law.<sup>103</sup> Atmos disagrees.

45. CURB recommends disallowing all incentive compensation expenses over and above base pay, including the financial portion of incentive compensation expenses for non-management employees.<sup>104</sup> In both the 10-415 and 12-764 Dockets, the Commission explicitly rejected CURB's more aggressive incentive compensation argument.<sup>105</sup>

46. The Commission concludes there is no reason to revisit its prior decisions on incentive compensation. Likewise, the Commission concludes there is no reason to revisit its decision announced in the 10-415 Docket to disallow incentive programs that focus on the financial aspect, rather than operational aspects. Accordingly, the Commission reaffirms its intent to disallow the costs of management incentive programs that focus on financial criteria. The Commission adopts Staff's recommendation to remove 100% of Atmos's short term Management Incentive Plan expenses, 50% of the time lapse portion of the Long Term Incentive Plan, and 100% of the expense associated with the Performance Based portion of the Long Term Incentive Plans

---

<sup>100</sup> Tr. Vol. 3, p. 655.

<sup>101</sup> Direct Testimony of Kristina A. Luke-Fry, Oct. 31, 2019, p. 19.

<sup>102</sup> *Id.*

<sup>103</sup> Staff Brief, ¶ 90.

<sup>104</sup> CURB Brief, ¶ 75.

<sup>105</sup> See Order on KCP&L's Application for Rate Change, Docket No. 12-KCPE-764-RTS, Dec. 13, 2012, ¶ 47.

allocated to Atmos's Kansas operations. Pursuant to K.S.A. 77-415(b), the Commission designates this paragraph as precedential.

### E. DEPRECIATION

47. There are three primary issues related to the testimonies of each party - net salvage, service lives and depreciation calculation procedure.<sup>106</sup> Ned Allis prepared a depreciation study for Atmos.<sup>107</sup> The study is based on the Equal Life Group (ELG) procedure, which differs from the Average Life Group (ALG) procedure, currently used to calculate depreciation rates for Atmos.<sup>108</sup> Staff witness Roxie McCullar believes the ALG procedure should continue to be used to calculate depreciation rates for Atmos.<sup>109</sup> Additionally, McCullar recommends adjustments to several of Atmos's proposed net salvage rates.<sup>110</sup> McCullar's adjustments would reduce Atmos's proposed Depreciation Rate and Expenses by \$2,622,802.<sup>111</sup>

48. CURB's witness, James Garren, proposes lower depreciation rates than Allis due to adjustments to the average service lives used to calculate depreciation rates for seven distribution accounts; and a proposed alternative method of estimating future net salvage, based on the most recent five-year history of the Company's net salvage experience.<sup>112</sup> Garren expresses concerns with Allis's methodology: (1) it produces unrealistically high future net salvage ratios; and (2) second, because net salvage and retirements are not causally related or mathematically correlated in any way, relying on this ratio yields unreliable and unsound results.<sup>113</sup> Therefore, Garren proposes a methodology which utilizes the most recent five-year average of net salvage to

---

<sup>106</sup> Rebuttal Testimony of Ned W. Allis (Allis Rebuttal), Nov. 18, 2019, p. 1.

<sup>107</sup> Direct Testimony of Ned W. Allis (Allis Direct), June 28, 2019, p. 1.

<sup>108</sup> *Id.*; Staff Brief, ¶ 106.

<sup>109</sup> Direct Testimony of Roxie McCullar (McCullar Direct), Oct. 31, 2019, p. 2.

<sup>110</sup> *Id.*, p. 11.

<sup>111</sup> *Id.*, p. 3.

<sup>112</sup> Direct Testimony of James S. Garren (Garren Direct), Oct. 31, 2019, p. 4.

<sup>113</sup> *Id.*

estimate future net salvage.<sup>114</sup> He estimates total future net salvage by multiplying the annual accrual requirement by the account remaining life.<sup>115</sup> Garren's adjustments would reduce Atmos's proposed Depreciation Rate and Expenses by \$2,973,248.<sup>116</sup>

### Net Salvage

49. Net salvage is gross salvage less cost of removal.<sup>117</sup> Net salvage is normally negative because cost of removal is typically greater than gross salvage for most accounts.<sup>118</sup> Depreciation rates are designed to recover future net salvage, not what has been recorded in the past.<sup>119</sup> Atmos, Staff, and CURB all propose different net salvage figures.

50. Allis proposes a methodology that calculates a ratio of annual net salvage over retirements, where he examines this ratio in five and ten year periods over the past fifteen years, and factors in the historical data, the age of the plant, managerial expectations, and the experience of other utilities in the industry, to arrive at a net salvage ratio for each account.<sup>120</sup>

51. On rebuttal, Allis claims Staff's and CURB's proposals rely almost entirely on historical data, compared to Atmos's forward looking proposals.<sup>121</sup> Allis accuses Staff and CURB of proposing alternatives that do not fully estimate future net salvage.<sup>122</sup> He argues that unlike Atmos, who has used the industry standard method of estimating future net salvage, Staff and CURB offer methodologies, which have no support from depreciation authorities and which at most have limited acceptance by regulatory commissions.<sup>123</sup> Allis contends that by failing to

---

<sup>114</sup> *Id.*, p. 34.

<sup>115</sup> *Id.*

<sup>116</sup> *Id.*, p. 36.

<sup>117</sup> Atmos Brief, ¶ 25.

<sup>118</sup> Allis Rebuttal, pp. 6-7, Garren Direct, p. 6.

<sup>119</sup> Allis Direct, pp. 13-14.

<sup>120</sup> Garren Direct, p. 27.

<sup>121</sup> Allis Rebuttal, pp. 1-2.

<sup>122</sup> *Id.*, p. 2.

<sup>123</sup> *Id.*

recover net salvage over the lives of the Company's assets, Staff's and CURB's proposals will produce intergenerational inequity, particularly as Atmos's accelerated pipe replacement program results in higher levels of net salvage.<sup>124</sup>

52. Atmos claims its uses the industry-standard method for analyzing net salvage is to express net salvage (and its components cost of removal and gross salvage) as a percentage or ratio of retirements,<sup>125</sup> whereas CURB's and Staff's methodologies consider the level of net salvage recorded in recent years, not as a percentage of retirements.<sup>126</sup>

53. As the Applicant, Atmos bears the burden of proof on all issues, including depreciation. The record contains several competing expert claims as to the correct methodology for determining the proper net salvage level, and Atmos is unable to prove that its methodology is the *only* methodology that will result in just and reasonable rates. While Atmos claims its methodology is superior to Staff's and CURB's, Atmos's net salvage estimates are not based purely on statistical analyses or historical net salvage amounts expressed as a percentage of retirements. As Allis states in his Direct Testimony, "the net salvage percentages in the Depreciation Study are based on a combination of statistical analyses and informed judgment."<sup>127</sup> Staff's depreciation witness McCullar testifies similarly, "[m]y proposed future net salvage accrual amounts are in current dollars that consider Atmos's historic practices, the impact of inflation, and builds a reserve for reasonable estimated future net removal costs associated with future retirements, based on the type of investments in the account, and my previous experience."<sup>128</sup>

---

<sup>124</sup> *Id.*

<sup>125</sup> Atmos Reply Brief, ¶ 28.

<sup>126</sup> *Id.*, ¶ 30.

<sup>127</sup> Allis Direct, p. 14.

<sup>128</sup> McCullar Direct, p. 12.

CURB's depreciation witness Garren, stands alone making a recommendation based strictly on the most recent five year average of net salvage.<sup>129</sup>

54. After examining the evidence on the issue of net salvage, the Commission is not convinced that it must adopt a particular methodology as the only "right" approach in this Docket. However, the Commission rejects CURB's methodology because it relies solely on recent historical net salvage experience. Although their methods of determining net salvage differ, Atmos, Staff, and CURB agree that the purpose of a net salvage analysis is to estimate the future level of net salvage that Atmos will incur as part of its depreciation expense. Both Staff and Atmos agree that a net salvage analysis should estimate appropriate levels of future net salvage, not solely rely strictly on historic expense levels. When deciding between Atmos and Staff's net salvage analyses, the Commission finds Staff's approach will best balance the interests of Atmos's current versus future ratepayers. Again, this finding is not based on adopting any particular methodology in this Docket, but that Staff's approach strikes the best balance between current and future ratepayers.

### **Service Lives**

55. On the issue of the appropriate service life estimates for Atmos's assets, Staff and Atmos utilize the same service lives,<sup>130</sup> but CURB recommends longer service lives for seven accounts.<sup>131</sup> Allis claims CURB's proposals are not based on sound methodology and are not consistent with the recommendations of depreciation authorities.<sup>132</sup> Atmos also contends CURB's

---

<sup>129</sup> Garren Direct, p 34.

<sup>130</sup> *Id.*, pp. 2-3.

<sup>131</sup> *Id.*, p. 3.

<sup>132</sup> *Id.*

service life proposals do not account for accelerated modernization of infrastructure.<sup>133</sup> Finally, Atmos asserts CURB's approach conflicts with NARUC's guidance on the issue.<sup>134</sup>

56. The Commission agrees with Atmos that Atmos's service life proposals are consistent with both the need to accelerate the modernization of infrastructure, and with the recommendations of depreciation authorities such as NARUC. Therefore, the Commission accepts Atmos's proposed service lives as agreed to by Staff.

### ELG versus ALG

57. On the question of whether to use the ELG or ALG procedure, Allis dismisses CURB's position as lacking any support, and Staff's arguments as not standing up to scrutiny.<sup>135</sup> While both ALG and ELG procedures are calculated to recover 100% of the original cost over the life of the plant, the ELG procedure should be adjusted annually and is front-loaded.<sup>136</sup>

58. Atmos acknowledges that adopting Staff's and CURB's recommendations to increase the lives of existing assets and decrease depreciation expense certainly achieves any short-term policy or goal of maintaining lower customer rates, as depreciation expense is the largest revenue requirement adjustment in this rate case.<sup>137</sup>

59. In its Reply Brief, Atmos argues that just because ELG produces higher depreciation rates does not mean that it is unjust and unreasonable and that ALG results in too low of depreciation rates in the early years of the life of property.<sup>138</sup> In doing so, Atmos has not demonstrated the Commission should change from its current process of applying the ALG

---

<sup>133</sup> Atmos Reply Brief, ¶ 42.

<sup>134</sup> *Id.*, 45.

<sup>135</sup> *Id.*

<sup>136</sup> McCullar Direct, p. 6.

<sup>137</sup> Atmos Brief, ¶ 42.

<sup>138</sup> Atmos Reply Brief, ¶ 52.

procedures to depreciation rates. Therefore, the Commission declines to deviate from the existing process. The Commission will apply ALG procedures to calculate Atmos's depreciation rates.

#### F. RATE CASE EXPENSE

60. The Parties agree that utilities are entitled to recover prudently incurred rate case expenses through rates.<sup>139</sup> Staff questions the costs associated with Reda's testimony regarding Atmos's incentive compensation plan and with Quackenbush's testimony regarding the proposed SIP.<sup>140</sup> CURB recommends allowing Atmos to collect its reasonable rate case expense through a three-year normalization.<sup>141</sup> CURB does not define what it considers reasonable rate case expense.

61. Atmos contends it would benefit the Commission to hear the perspective of someone from outside Atmos, who could provide a broader look at SIP-like mechanisms.<sup>142</sup> Therefore, Atmos believes the expenses of Quackenbush, a former regulator who had approved similar mechanisms, are justified for inclusion in rates.<sup>143</sup> The Commission disagrees.

62. As Quackenbush readily admits, he provides testimony on what other states have allowed for ROEs based on RRA reports.<sup>144</sup> He acknowledges that RRA's evaluation are from the perspective of investors.<sup>145</sup> Quackenbush's testimony is premised on his knowledge garnered as a former Michigan Commissioner. Expert testimony is proper if it will be of special help to the factfinder on technical subjects with which the factfinder is not familiar or if it would assist the factfinder in reaching a reasonable factual conclusion.<sup>146</sup> The Commission is capable of interpreting the RRA ratings without the aid of expert testimony. Furthermore, Quackenbush's

---

<sup>139</sup> Rebuttal Testimony of Jennifer K. Story, Nov. 18, 2019, p. 28; Direct Testimony of Ian D. Campbell, Oct. 31, 2019, p. 6.

<sup>140</sup> Staff Brief, ¶ 163.

<sup>141</sup> CURB Brief, ¶ 101.

<sup>142</sup> Atmos Brief, ¶ 72.

<sup>143</sup> *Id.*

<sup>144</sup> Tr., Vol. 1, p. 210-211.

<sup>145</sup> Quackenbush Rebuttal, p. 15.

<sup>146</sup> *Sterba v. Jay*, 249 Kan. 270, 282 (1991).



testimony substantially overlaps with that of Gary L. Smith and Gary W. Gregory. Under these circumstances, Quackenbush's testimony has little probative value, therefore, the Commission disallows his expenses from rate case expense.

63. Atmos believes Reda's testimony is necessary to show the reasonableness of total compensation paid to Atmos's employees based upon what similar employees are paid in the market.<sup>147</sup> In addition, since Staff did not question the reasonableness of similar testimony in the recent Kansas Gas Service rate case, Atmos assumed Reda's costs were prudently incurred.<sup>148</sup> Staff counters by explaining that Reda's compensation is significantly higher than his counterpart in the Kansas Gas Service rate case.<sup>149</sup> As Justin Grady testified, Kansas Gas Service spent \$42,590 on an external consultant for incentive compensation; whereas Atmos spent \$79,000, nearly double the amount incurred by Kansas Gas Service.<sup>150</sup> Subsequently, on February 14, 2020, Atmos updated its estimated rate case expense, upping Reda's expenses to \$91,368.<sup>151</sup> Reda's expenses are higher than either of the outside attorneys that tried this case and higher than its ROE witness. ROE is a much larger financial piece of Atmos's rate case than incentive compensation.

64. Grady also questions the need for Reda's testimony because he believes Atmos could have used internal employees as it did in its last rate case to testify on incentive compensation.<sup>152</sup> Since Staff's treatment of incentive compensation expense has been consistent since the 10-415 case, Grady sees no need for Atmos to incur the cost of an outside expert on incentive compensation.<sup>153</sup> Grady notes that Gary Gregory is already a witness in this matter and

---

<sup>147</sup> Atmos Brief, ¶ 71.

<sup>148</sup> *Id.*

<sup>149</sup> Staff Brief, ¶ 163.

<sup>150</sup> Tr., Vol. 2, p. 483.

<sup>151</sup> Estimated Rate Case Expense, Feb. 14, 2020, p. 1.

<sup>152</sup> Tr., Vol. 2, p. 482.

<sup>153</sup> *Id.*

that Barbara Myers, who is listed by Atmos on its rate case exhibit list as a manager of this filing, and has previously provided testimony on this topic, could have also testified in lieu of Reda.<sup>154</sup>

65. Reda did not prepare any studies for Atmos. Instead, he just reviewed two studies prepared by Pay Governance LLC for the Atmos Energy Board of Directors Human Resources Committee.<sup>155</sup> Both studies conclude that Atmos's total direct compensation levels were at or below the 50<sup>th</sup> percentile compared to its peer group and published survey data.<sup>156</sup> Since both studies were presented to Atmos back in October 2018,<sup>157</sup> the Commission questions the need to retain Reda to testify on these studies. Despite the Commission's concerns, since Atmos bears the burden of proof, it is entitled to pick a witness it believes will best present its case. Also, since the Commission did not disallow any rate case expense relating to incentive compensation in the recent Kansas Gas Service rate case,<sup>158</sup> it will not disallow all of Reda's expenses. While the Commission elects not to disallow all of Reda's expenses, it finds his expenses excessive and duplicative. Compared to the expenses incurred by Kansas Gas Service and also the expenses incurred by both Atmos's outside attorneys and Atmos's ROE witness, Reda's expenses are excessive. For these reasons, the Commission disallows half (\$45,684) of Reda's expenses.

66. Atmos seeks to recover its rate case expense through a one-year surcharge on customer bills, but is willing to agree to a two-year recovery period.<sup>159</sup> CURB recommends allowing Atmos's rate case expenses to be recovered through a three-year normalization of those costs in base rates.<sup>160</sup> Staff opposes Atmos's proposed rate case expense surcharge because it

---

<sup>154</sup> *Id.*

<sup>155</sup> Reda Rebuttal, p. 8.

<sup>156</sup> *Id.*, p. 9.

<sup>157</sup> *Id.*, p. 8.

<sup>158</sup> *See* Tr., Vol. 2, p. 488.

<sup>159</sup> Atmos Brief, ¶ 73.

<sup>160</sup> CURB Brief, ¶ 101.

believes it will reduce Atmos's incentive to prudently manage its rate case expenses and because it would allow Atmos to recover its rate case expense too quickly.<sup>161</sup>

67. In Atmos's most recent rate case, the Commission ordered it to amortize its rate case expense over three years.<sup>162</sup> Atmos has not provided sufficient justification to change course. Therefore, the Commission finds Atmos should amortize its rate case expense over three years.

### G. MONTHLY RESIDENTIAL CUSTOMER CHARGE

68. Currently, Atmos residential customers are charged a monthly fixed charge of \$18.04 per month, in addition to paying for the volume of gas they use.<sup>163</sup> Atmos is seeking to increase the monthly fixed charge to \$22.00.<sup>164</sup> Staff proposes a smaller increase to \$18.89.<sup>165</sup> CURB recommends decreasing the monthly charge to \$15.00.<sup>166</sup> CURB arrives at the \$15.00 figure by performing a direct customer cost analysis,<sup>167</sup> which produces a residential direct customer cost in the range of roughly \$9-\$10.<sup>168</sup> Because the current fixed monthly charge is \$18.04, CURB witness Watkins considers it excessive.<sup>169</sup> But Watkins stops short of recommending setting the fixed monthly charge at \$10 because of gradualism and his assumption that the Commission will want to include some overhead expenses in the fixed charge.<sup>170</sup> Due to those two considerations, Watkins recommends a \$15 customer charge.<sup>171</sup> On cross-examination,

---

<sup>161</sup> Staff Brief, ¶ 159.

<sup>162</sup> *Id.*, ¶ 160.

<sup>163</sup> The Commission approved a residential fixed charge of \$18.91 in Atmos's last rate case, Docket No. 16-ATMG-079-RTS. The \$18.91 was reduced to \$18.04 due to tax reform and further reduced to \$17.72 for the period of April 2018-March 2019, due to the deferred revenue credit. Direct Testimony of Robert H. Glass, Ph.D. (Glass Direct), Oct. 31, 2019, p. 10, Table 4.

<sup>164</sup> Atmos Brief, ¶ 74.

<sup>165</sup> Staff Brief, ¶ 166.

<sup>166</sup> CURB Brief, ¶ 102.

<sup>167</sup> Tr. Vol. 3, p. 660.

<sup>168</sup> *Id.*, p. 661.

<sup>169</sup> *Id.*, p. 662.

<sup>170</sup> *Id.*

<sup>171</sup> *Id.*

Watkins acknowledges that shifting some costs from the fixed monthly charge to a volumetric charge could result in higher bills in cold weather.<sup>172</sup>

69. Atmos witness Paul H. Raab expresses his concern that Atmos faces a significant risk when it has to try to collect fixed costs through volumetric charges<sup>173</sup> because the costs remain fixed and Atmos may not collect enough revenues to meet its authorized rate of return.<sup>174</sup> Dr. Robert H. Glass, the Commission's Chief of Economics and Rates, testified that Atmos is best situated among gas utilities operating in Kansas because it is experiencing customer growth and has a weather normalization adjustment (WNA), which in addition to the weather normalization of the revenue requirement, protects Atmos from weather fluctuations,<sup>175</sup> and therefore, Atmos, should not require a higher customer charge.<sup>176</sup>

70. In Atmos's last rate case, Staff attempted to slow the trend of rising fixed monthly charges, where the fixed charges have increased at a greater rate than the commodity charge.<sup>177</sup> At the same time, Staff acknowledges that fixed costs should be recovered through fixed charges.<sup>178</sup> During the test year, 64% of the residential base rate revenue came from fixed charges.<sup>179</sup> CURB argues that by collecting roughly two-thirds of its residential base rate revenue through fixed charges, Atmos inhibits residential customer's ability to control their bills through conservation.<sup>180</sup>

71. The Commission concludes that an increase of the fixed monthly charge is not warranted based on Atmos's WNA and increasing customer base. At the same time, the

---

<sup>172</sup> *Id.*, p. 666.

<sup>173</sup> *Id.*, p. 678.

<sup>174</sup> *Id.*, p. 679.

<sup>175</sup> *Id.*, p. 686.

<sup>176</sup> *Id.*

<sup>177</sup> Glass Direct, p. 21.

<sup>178</sup> *Id.*

<sup>179</sup> *Id.*, p. 22.

<sup>180</sup> Direct Testimony of Glenn A. Watkins, Oct. 31, 2019, p. 27.

Commission is concerned that CURB's recommended \$15.00 fixed monthly charge is not supported by competent evidence. The Commission finds that Staff's proposed \$18.89 strikes the proper balance between allowing Atmos to collect its fixed costs and providing customers with some ability to manage their gas usage to lower their monthly bills. An \$18.89 monthly charge is consistent with Kansas Gas Service's \$18.70 and Black Hills Energy's \$17.25.<sup>181</sup> Accordingly, the Commission adopts \$18.89 as the monthly residential customer charge.

72. On the issue of weather normalization, Atmos agrees to accept Staff's WNA proposal. In doing so, Atmos expresses its desire to work with Staff to develop updated WNA tariffs and future WNA annual filings to incorporate the new classes and weather sensitivity factors.<sup>182</sup> Accordingly, the Commission directs the parties to jointly develop the updated WNA tariffs and future WNA annual filings to incorporate the new classes and weather sensitivity factors. The parties shall file a status update by June 1, 2020 outlining the proposed implementation process for Commission consideration.

#### **H. OTHER RATE BASE AND INCOME STATEMENT ADJUSTMENTS**

73. The Commission accepts the following uncontested accounting adjustments:

• Donation Expense (Staff IS-9)	(\$74,772)
• Other Postretirement Benefits (Staff IS-14)	(\$68,917)
• Interest on Customer Deposits (Staff IS-7)	(\$1,102)
• Advertising Expense (Staff IS-8)	(\$9,605)
• Pension Expense (Staff IS-13)	(\$65,132)
• Pension Tracker 1 and OPEB Tracker 1 (Staff IS-15)	\$98,094

---

<sup>181</sup> Tr. Vol. 3, p. 687.

<sup>182</sup> Rebuttal Testimony of Gary L. Smith, Nov. 18, 2019, p. 24.

• Leases (Staff IS-16)	\$76,517
• Weather Normalization (Staff IS-17)	(\$466,047)
• Customer Annualization (Staff IS-18)	\$119,039
• KCC Annual Assessment Expense (Staff IS-10)	(\$8,070)
• Customer Deposits (Staff RB-5)	\$40,502
• Prepayments (Staff RB-6)	\$62,178
• Storage Gas (Staff RB-7)	\$527,781

**Construction Work in Progress (CWIP)**

74. Atmos believes it should be allowed to include the CWIP balance of \$1,620,606, in rate base because it has verified the listed projects will be completed and in service by no later than February 2020, within one year from the end of the test year.<sup>183</sup> CURB witness Andrea C. Crane does not believe most of the claimed CWIP were incurred before the end of the test year, and thus should be excluded from rate base.<sup>184</sup> CURB recommends including \$1,307,897 of CWIP in rate base.<sup>185</sup> Staff recommends excluding all CWIP not closed to Plant in Service by August 31, 2019 from rate base.<sup>186</sup> Staff's adjustment would remove \$11,110,143 from Atmos's rate base.<sup>187</sup>

75. Staff's review of Atmos's workpapers reveals Atmos missed the projected in-service date of approximately 55% of the projects it projected to be placed into service by September 30, 2019.<sup>188</sup> The only evidence that Atmos offers to suggest that projects were expected to be completed by February 2020 is hearsay testimony from Jennifer Story that Bart Armstrong

---

<sup>183</sup> Atmos Brief, ¶ 52.

<sup>184</sup> Direct Testimony of Andrea C. Crane (Crane Direct), Oct. 31, 2019, p. 11.

<sup>185</sup> *Id.*, p. 12.

<sup>186</sup> Staff Brief, ¶ 124.

<sup>187</sup> Direct Testimony of Brad Hutton, Oct. 31, 2019, p. 5.

<sup>188</sup> Staff Brief, ¶ 128.

verified that the projects listed on a worksheet would be completed by February.<sup>189</sup> Her testimony is not enough to demonstrate the listed projects will be in service by February 2020. Therefore, the Commission approves Staff's adjustment to remove \$11,110,143 from Atmos's rate base.

### **Miscellaneous Expenses**

76. Staff recommends disallowing \$46,123 of miscellaneous expenses because those dues paid to professional organizations do not directly benefit ratepayers.<sup>190</sup> Atmos counters that only \$29,047 should be disallowed because the cost of those licensing fees and membership dues are reasonable, Staff used an incorrect allocation factor, and Staff eliminated some legal expenses that Atmos did not include in its Application.<sup>191</sup> Staff claims to have corrected these errors in its final adjustments, which Atmos did not dispute.<sup>192</sup> Atmos did not present any evidence to rebut Staff's claim that the license fees and membership dues directly benefit ratepayers. Accordingly, the Commission adopts Staff's adjustment and disallows \$46,123 of miscellaneous expenses because those dues paid to professional organizations do not directly benefit ratepayers.

### **Plant, Accumulated Depreciation, Accumulated Deferred Income Tax (ADIT), and Excess Deferred Income Tax (EDIT) Accounts**

77. Atmos seeks to update Plant in Service to September 30, 2019, which would increase its rate base by \$9,402,791.<sup>193</sup> Staff opposes updating Atmos's balances for Plant in Service beyond August 31, 2019, because nearly every other update to the test year is through August 30, 2019.<sup>194</sup> Staff's adjustment would increase Atmos's rate base by \$7,840,069.<sup>195</sup> The

---

<sup>189</sup> Tr. Vol 2, p. 525.

<sup>190</sup> Staff Brief, ¶ 118.

<sup>191</sup> Atmos Brief, ¶ 64.

<sup>192</sup> Staff Brief, ¶ 119.

<sup>193</sup> Atmos Brief, ¶ 55.

<sup>194</sup> Staff Brief, ¶ 131.

<sup>195</sup> *Id.*, ¶ 130.

Commission adopts Staff's adjustment as it more closely resembles Atmos's ongoing cost of doing business and is synchronized with the vast majority of other adjustments in this Docket.<sup>196</sup>

78. Staff advises that Plant in Service (and thus Depreciation Expense), ADIT, and Accumulated Depreciation need to be updated through the same date to avoid IRS Normalization Violations.<sup>197</sup> Therefore, the Commission finds that ADIT, Accumulated Depreciation, and Depreciation Expense should to be updated through August 31, 2019.

#### **Accumulated Deferred Income Taxes (ADIT)**

79. Staff proposed increasing ADIT by \$1,081,792, which is an offset to Plant in Service, which decreases rate base.<sup>198</sup> Staff's adjustment is due to: (1) updating ADIT balances to update period of August 31, 2019; (2) remove ADIT associated with pension and FAS 106 costs; (3) remove ADIT associated with Regulatory Liability-Mid Tex; and (4) remove portions of ADIT corresponding to Staff's incentive compensation adjustment.<sup>199</sup> In acknowledging a difference in timing between the recovery of pension and post-retirement benefits in rates and the deduction for this amount on its tax return, Atmos claims that the timing difference is no different than any other timing difference for expense included in rates, and notes Staff has not made this adjustment in previous Atmos rate cases.<sup>200</sup> Atmos admits it mislabeled the Regulatory Liability-Mid Tex balance in its Application but argues that the balance should be included as an adjustment to rate base because it relates to pensions and post-retirement obligations.<sup>201</sup>

80. Staff claims its proposed adjustments to ADIT to remove the ADIT balances associated with pension expenses and FAS 106 costs are necessary to match up the removal of

---

<sup>196</sup> See *id.*, ¶ 132.

<sup>197</sup> Staff Brief, ¶ 141.

<sup>198</sup> *Id.*, ¶ 136.

<sup>199</sup> *Id.*

<sup>200</sup> Atmos Brief, ¶ 57.

<sup>201</sup> *Id.*, ¶ 58.



pension and FAS 106 costs from rate base.<sup>202</sup> Atmos has not effectively countered this rationale and Ms. Story admits that these balances are not in rate base.<sup>203</sup> Accordingly, the Commission accepts Staff's adjustments to ADIT for this issue. The remainder of Staff's adjustments to ADIT are consistent with its proposal to remove certain incentive compensation expenses from the revenue requirement.<sup>204</sup> Accordingly, since the Commission accepted Staff's proposal to remove certain incentive compensation expenses, it elects to adopt Staff's adjustments to ADIT.

**Excess Deferred Income Tax (EDIT)**

81. Staff recommends: (1) updating the level of EDIT amortization and Atmos's EDIT regulatory liability to reflect Atmos's most recent revisions to EDIT amounts; (2) removing portions of EDIT that correspond to equity compensation and incentive compensation amounts removed by Staff; and (3) amortizing the before-tax-gross-up EDIT balance to deferred tax expense, as in every single regulated utility rate case filed in Kansas since the implementation of the Tax Cuts and Jobs Act.<sup>205</sup> Staff recommends including \$19,346,609 of EDIT regulatory liability and an EDIT amortization amount of (\$711,062).<sup>206</sup> Atmos's only dispute with Staff's adjustment is its removal of certain EDIT amounts related to its incentive compensation adjustment. As the Commission has accepted Staff's incentive compensation adjustment, so too does it accept Staff's EDIT adjustment related to incentive compensation. Accordingly, the Commission adopts Staff's adjustments to EDIT.

---

<sup>202</sup> Staff Brief, ¶ 139.

<sup>203</sup> Tr. Vol 2, p. 526.

<sup>204</sup> Atmos Brief, ¶ 59.

<sup>205</sup> Staff Brief, ¶ 133.

<sup>206</sup> *Id.*, ¶ 134.

### **Accumulated Depreciation**

82. Staff recommends decreasing Atmos's Rate Base by \$2,161,428 to reflect the balance of Accumulated Depreciation through Staff's update period ending August 31, 2019. Staff's proposed adjustment would synchronize the balance of Plant In Service and its corresponding Accumulated Depreciation balances.<sup>207</sup> This adjustment to Accumulated Depreciation ensures ratepayers are given credit for the capital they have returned to Atmos, and therefore, no longer need to pay a return on.<sup>208</sup> Atmos's dispute with Staff appears to revolve around the timing to update the balance. The Commission adopts Staff's adjustment to synchronize Plant In Service and Accumulated Depreciation as of August 31, 2019.

### **Bad Debt Expense**

83. Staff proposes to decrease operating expenses by \$27,838 to account for bad debt expense. Staff used a three-year average net bad debt write-off percentage of 0.4004% through year-end August 31, 2019.<sup>209</sup> CURB favors a normalization adjustment that accounts for multiple years and would decrease operating expense by \$46,869 to account for bad debt expense.<sup>210</sup> Atmos disputes CURB's and Staff's adjustments. Atmos argues CURB's adjustments are inconsistent with previous Atmos rate cases and will preclude the Company from recovering its actual costs.<sup>211</sup> Other than alleging Staff's methodology of using a three-year average is not consistent with past Commission practice in Atmos dockets, Atmos does not present a compelling reason to reject Staff's adjustment. Therefore, the Commission adopts Staff's adjustment to bad debt expense.

---

<sup>207</sup> *Id.*, ¶ 135.

<sup>208</sup> *Id.*

<sup>209</sup> *Id.*, ¶ 146.

<sup>210</sup> CURB Brief, ¶ 93; Crane Direct, Schedule ACC-12.

<sup>211</sup> Atmos Brief, ¶ 63.

### **Depreciation Expense**

84. Staff proposes decreasing annualized depreciation expense by \$2,413,239, by increasing Atmos' pro-forma depreciation expense by \$303,708 for updates to Atmos' Plant in Service and decreasing Atmos' depreciation expense by \$2,716,947 to reflect Staff's recommended depreciation rates.<sup>212</sup> Any adjustment to depreciation expense needs to be synchronized with the updated Plant in Service date.<sup>213</sup> Having already adopted a Plant in Service date of August 31, 2019, the Commission adopts the same date for depreciation expense. Additionally, the Commission ruled above that Atmos' depreciation expense should be calculated using Staff's recommended depreciation rates. Accordingly, the Commission approves Staff's adjustment for depreciation expense.

### **Payroll Expense and Benefit Expenses**

85. Atmos agrees with Staff's recommendation to update payroll and employee benefits expenses through August 31, 2019, but complains Staff's adjustment only included 11 months of the merit increases.<sup>214</sup> CURB recommends increasing payroll expense by \$67,818.<sup>215</sup> Atmos also disagrees with CURB's payroll tax adjustment, claiming it mistakenly assumes that taxes are paid at the statutory rates.<sup>216</sup> Atmos seeks to add a 0.25% (one-twelfth of 3%) of the annualized merit increase to Staff's adjustment, which would increase payroll expense by \$96,868 and increase employee benefit expense by \$30,456.<sup>217</sup>

86. The Commission rejects Atmos' approach to calculating a full 12 months of merit increase because it multiplies the full year of payroll expense by 1.5%, when half of the months in

---

<sup>212</sup> Staff Brief, ¶ 150.

<sup>213</sup> *Id.*, ¶ 151.

<sup>214</sup> Atmos Brief, ¶ 60.

<sup>215</sup> CURB Brief, ¶ 92; Crane Direct, Schedule ACC-8.

<sup>216</sup> Atmos Brief, ¶ 60

<sup>217</sup> *Id.*

the test year already includes the potential 3.0% merit increase.<sup>218</sup> Additionally, Atmos's approach assumes that there are no hires, fires, or promotions since the test year. Staff's update, ending August 31, 2019, includes 12 months of actual known and measurable payroll expense that contains the changes to the test year payroll Atmos attempted to include in the cost of service. Accordingly, the Commission accepts Staff's adjustments.

87. Staff proposes decreasing operating expense by \$202,065, by updating Atmos's benefits expense to account for actual expenses incurred by Atmos for the 12-months ending August 31, 2019.<sup>219</sup> CURB proposes a \$26,847 increase in employee benefit expenses.<sup>220</sup> Atmos disputes CURB's adjustment to employee benefit expenses. The Commission rejects Atmos's adjustment because it is not based on actual known and measurable amounts, and is merely an estimate of how benefits expenses can change with changes to payroll expenses. Therefore, the Commission accepts Staff's adjustment which relies on known and measurable information, and more closely match Atmos's current cost of service.

**Lobbying/Membership dues/Meals & Entertainment/SERP expenses**

88. CURB asserts certain activities are not necessary for the provision of safe and adequate service and seeks to disallow up to 50% American Gas Association (AGA) dues expense not related to lobbying,<sup>221</sup> 50% of Atmos' request for meals and entertainment expenses not deducted from taxes,<sup>222</sup> and 100% of Atmos's supplemental executive retirement plan (SERP) expenses.<sup>223</sup> Staff does not contest Atmos's expenses in these areas. While K.S.A. 66-1,206(a) allows the Commission to disallow 50% of utility dues, donations and contributions to charitable,

---

<sup>218</sup> Staff Brief, ¶ 154.

<sup>219</sup> *Id.*, ¶ 157.

<sup>220</sup> Crane Direct, Schedule ACC-10.

<sup>221</sup> Atmos Brief, ¶ 65.

<sup>222</sup> CURB Brief, ¶ 100.

<sup>223</sup> Crane Direct, Schedule ACC-11.

civic and social organizations and entities, and not specific dues, donations and contributions which are found unreasonable or inappropriate, the Commission does not find that CURB has shown the challenged expenses are unreasonable or inappropriate. In addition, the Commission has already accepted Staff's adjustments to miscellaneous expenses, which removes various expenses that do not provide direct ratepayer benefits. Therefore, the Commission denies CURB's proposed adjustments for lobbying, membership dues, meals and entertainment, or SERP expenses.

### **Abbreviated Rate Case**

89. Pursuant to K.A.R. 82-1-231(b)(3)(A), Atmos seeks to file an abbreviated rate case within 12 months of this Order.<sup>224</sup> The abbreviated rate case would be designed to update rates to reflect new non-growth revenue infrastructure investment that is not included in rates and is not eligible for recovery under Atmos's GSRS tariff or SIP tariff but will have been placed in service by the time the audit of the abbreviated filing is completed.<sup>225</sup> Staff argues because Atmos will fully recover its increase in safety, reliability, and GSRS-eligible Net Plant through the GSRS and SIP mechanism, an abbreviated rate case is unwarranted.<sup>226</sup> The Commission agrees. As discussed in paragraph 39, the Commission would approve a SIP with additional conditions, including a three-year rate moratorium. If Atmos elects to make a compliance filing with a SIP tariff, it will render its request for an abbreviated rate case moot. In the event that Atmos does not make a compliance filing, its request for an abbreviated rate case is denied.

90. Atmos requested a net revenue increase of \$7,163,131. The Commission finds Atmos is entitled to a net revenue reduction of \$223,953. Under Atmos's original request, the

---

<sup>224</sup> Application, ¶ 9.

<sup>225</sup> *Id.*

<sup>226</sup> Staff Brief, ¶ 84.

average residential ratepayer's bill would have increased by \$4.33 in winter months and \$3.41 in summer months.<sup>227</sup> But under this Order, the average residential ratepayer's bill will only increase by \$0.35 in winter months and \$0.11 in summer months.<sup>228</sup> The slight increase in residential ratepayer's bills is designed to reduce the continued subsidization of the residential class, which represents about 72% of total base rate revenue collected,<sup>229</sup> by the commercial sales class, and bring the classes closer to parity.<sup>230</sup>

91. The Commission considered all of the evidence in the record and considered the positions and arguments of all the parties in making its findings and conclusions. The failure to specifically address a particular item, position, or argument offered into evidence does not indicate it was not considered by the Commission.

**THEREFORE, THE COMMISSION ORDERS:**

A. The Commission sets Atmos's overall revenue requirement based on an operating income of \$14,780,974, a rate base of \$242,313,526, a return on equity of 9.1%, and an overall rate of return of 7.03%. The Commission approves a base rate revenue requirement increase of \$3,067,466. After accounting for the reduction of the GSRS charge by \$3,291,419, the net impact on customers of this Order is a revenue requirement reduction of \$223,953.<sup>231</sup>

B. Atmos's proposed SIP mechanism is rejected, but the Commission would approve a SIP tariff for a SIP with a \$35 million cap over five years, and with an annual surcharge, three-year rate moratorium, and is available only after Atmos exhausts its GSRS, if sought by Atmos.

---

<sup>227</sup> See Direct Testimony of Paul H. Raab (Raab Direct), June 28, 2018, p. 24.

<sup>228</sup> See Glass Direct, p. 26, Table 11.

<sup>229</sup> *Id.*, p. 19.

<sup>230</sup> See *id.*, p. 20; Raab Direct, p. 26.

<sup>231</sup> See Attachment A to the Order for an overview calculation of the revenue requirement increase.

C. Pursuant to K.S.A. 77-415(b), paragraph 46 of this Order is designated precedential. Accordingly, this Order will be included in the Commission's index of precedential orders, published on the Commission's website.

D. The corresponding rate increases shall be set in accordance with the Commission's Final Revenue Requirement Calculation, attached as Attachment A. The Commission's Final Revenue Requirement Calculation is based on Staff's filed schedules and revised in accordance with the Commission's decisions on the contested issues.

E. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).<sup>232</sup>

F. The Commission retains jurisdiction over the subject matter and parties to enter further orders as it deems necessary.

**BY THE COMMISSION IT IS SO ORDERED.**

Duffy, Chair; Albrecht, Commissioner; Keen, Commissioner

02/24/2020

Dated: \_\_\_\_\_



\_\_\_\_\_  
Lynn M. Retz  
Executive Director

BGF

<sup>232</sup> K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

**DOCKET NO. 19-ATMG-525-RTS**  
**ATTACHMENT A**  
**Page 1 of 3**

**ATMOS ENERGY**  
**COMMISSION ORDER**  
**SUMMARY OF ADJUSTMENTS TO RATE BASE**  
**FOR THE TEST YEAR ENDED MARCH 31, 2019**

<b>DESCRIPTION</b>	<b>AMOUNT</b>
<b>RATE BASE PER APPLICANT</b>	<b>248,709,964</b>
<b>ADJUSTMENTS TO RATE BASE ACCEPTED BY THE COMMISSION</b>	
STAFF-1 Removal of Construction Work in Progress	(11,110,143)
STAFF-2 Update of Plant to August 31, 2019	7,840,069
STAFF-3 Update of Accumulated Depreciation to August 31, 2019	(2,161,428)
STAFF-4 Update of Accumulated Deferred Income Tax to August 31, 2019	(1,081,792)
STAFF-5 Update Customer Deposits to August 31, 2019	40,502
STAFF-6 Update Prepayments to a 13 month average ending to August 31, 2019	62,178
STAFF-7 Update Storage Gas balances to August 31, 2019	527,781
STAFF-8 Update certain tax items from the Company's estimated to actuals	<u>(513,605)</u>
<b>TOTAL ADJUSTMENTS TO RATE BASE</b>	<b><u>(6,396,438)</u></b>
<b>COMMISSION ADOPTED RATE BASE</b>	<b><u><u>242,313,526</u></u></b>



DOCKET NO. 19-ATMG-525-RTS  
ATTACHMENT A  
Page 2 of 3

ATMOS ENERGY  
COMMISSION ORDER  
SUMMARY OF ADJUSTMENTS TO OPERATING INCOME  
FOR THE TEST YEAR ENDED MARCH 31, 2019

DESCRIPTION	AMOUNT
OPERATING INCOME PER APPLICANT	12,798,524
<b>ADJUSTMENTS TO OPERATING INCOME ACCEPTED BY THE COMMISSION</b>	
STAFF-1 Payroll expense for 12 months ending August 31, 2019	(75,433)
STAFF-2 Payroll tax update (See Adj. No. 1)	49,345
STAFF-3 Benefit expense for 12 months ending August 31, 2019	202,065
STAFF-4 Equity Compensation Expense	559,029
STAFF-5 Depreciation Expense--Staff Depreciation Rates	2,413,239
STAFF-6 Bad Debt Expense	26,358
STAFF-7 Interest on Customer Deposits	1,102
STAFF-8 Advertising	9,605
STAFF-9 Donations	74,772
STAFF-10 Kansas Corporation Commission Assessment fees	8,070
STAFF-11 Miscellaneous expenses	46,123
STAFF-12 Rate Case Expense	(323,667)
STAFF-13 Pension Expense Update through August 31, 2019	65,132
STAFF-14 OPEB Update through August 31, 2019	68,917
STAFF-15 Pension and Post Retirement tracker balances	(98,094)
STAFF-16 Lease Expense	(76,517)
STAFF-17 Weather Normalization	(466,047)
STAFF-18 Customer Annualization	119,039
STAFF-19 Income Tax Expense	(620,588)
TOTAL ADJUSTMENTS TO OPERATING INCOME	<u>1,982,449</u>
OPERATING INCOME ADOPTED BY THE COMMISSION	<u><u>14,780,973</u></u>

DOCKET NO. 19-ATMG-525-RTS  
 ATTACHMENT A  
 Page 3 of 3

ATMOS ENERGY  
 COMMISSION ORDER  
 REVENUE REQUIREMENT CALCULATION  
 FOR THE TEST YEAR ENDED MARCH 31, 2019

LINE NO.	DESCRIPTION	AMOUNT
1	RATE BASE AS ADOPTED	242,313,526
2	RATE OF RETURN ON RATE BASE AS ADOPTED (1)	7.03%
3	NET OPERATING INCOME REQUIRED	17,034,641
4	PROFORMA OPERATING INCOME	14,780,973
5	DIFFERENCE	2,253,668
6	INCOME TAX FACTOR	0.734700
7	PROFORMA REVENUE INCREASE / (DECREASE)	3,067,466

(1) COMMISSION APPROVED CAPITAL STRUCTURE:

DESCRIPTION	CAPITALIZATION RATIO	COST OF CAPITAL	WEIGHTED COST OF CAPITAL
*****	*****	*****	*****
LONG TERM DEBT	43.68%	4.37%	1.91%
EQUITY	56.32%	9.10%	5.12%
TOTALS	100.00%		7.03%

**CERTIFICATE OF SERVICE**

19-ATMG-525-RTS

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 02/24/2020.

JAMES G. FLAHERTY, ATTORNEY  
ANDERSON & BYRD, L.L.P.  
216 S HICKORY  
PO BOX 17  
OTTAWA, KS 66067  
Fax: 785-242-1279  
jflaherty@andersonbyrd.com

SHELLY M BASS, SENIOR ATTORNEY  
ATMOS ENERGY CORPORATION  
5430 LBJ FREEWAY  
1800 THREE LINCOLN CENTRE  
DALLAS, TX 75240  
shelly.bass@atmosenergy.com

JARED GEIGER, SR RATE ANALYST  
ATMOS ENERGY CORPORATION  
1555 BLAKE ST STE 400  
DENVER, CO 80202  
jared.geiger@atmosenergy.com

JOSEPH R. ASTRAB, ATTORNEY  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
j.astrab@curb.kansas.gov

TODD E. LOVE, ATTORNEY  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
t.love@curb.kansas.gov

DAVID W. NICKEL, CONSUMER COUNSEL  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
d.nickel@curb.kansas.gov

SHONDA RABB  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
s.rabb@curb.kansas.gov

DELLA SMITH  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3116  
d.smith@curb.kansas.gov

PHOENIX ANSHUTZ, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3354  
p.anshutz@kcc.ks.gov

COLE BAILEY, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3354  
c.bailey@kcc.ks.gov

**CERTIFICATE OF SERVICE**

19-ATMG-525-RTS

BRIAN G. FEDOTIN, GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3354  
b.fedotin@kcc.ks.gov

ROBERT VINCENT, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
Fax: 785-271-3354  
r.vincent@kcc.ks.gov

JAMES H JEFFRIES IV, PARTNER  
MCGUIREWOODS LLP  
201 NORTH TRYON STREET  
SUITE 3000  
CHARLOTTE, NC 28202-2146  
jjeffries@mcguirewoods.com

/s/ DeeAnn Shupe  
DeeAnn Shupe

---