

November 22, 2024

Ms. Linda C. Bridwell, P.E.
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Re: *Electronic Application for Performance Based Ratemaking Mechanism*
Case No. 2024-00205

Dear Ms. Bridwell:

Please find attached Atmos Energy Corporation's Response to Commission Staff's Second Request for Information in the above- styled case.

This is to certify that the foregoing electronic filing was transmitted to the Commission on November 22, 2024; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing will be made.

If you have any questions, please let me know.

Sincerely,

Heather S. Temple

Heather S. Temple

Enclosure

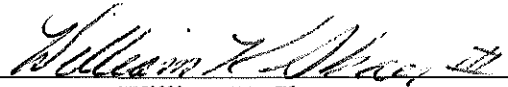
BEFORE THE PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

REQUEST OF ATMOS ENERGY CORPORATION)
FOR EXTENSION OF ITS GAS COST)
ADJUSTMENT PERFORMANCE BASED) Case No. 2024-00205
RATE MECHANICSM)

CERTIFICATE AND AFFIDAVIT

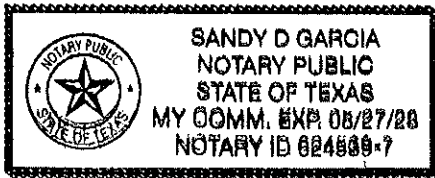
The Affiant, William K. Skaer, being duly sworn, deposes and states that the attached responses to Commission Staff's second request for information are true and correct to the best of his knowledge and belief.

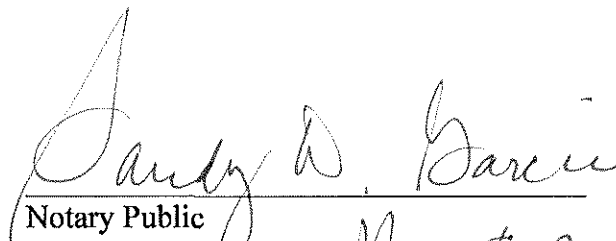


William K. Skaer

STATE OF TEXAS
COUNTY OF DALLAS

SUBSCRIBED AND SWORN to before me by William K. Skaer on this the 21st day of November, 2024.





Notary Public
My Commission Expires: August 27, 2028

BEFORE THE PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

REQUEST OF ATMOS ENERGY CORPORATION)
FOR EXTENSION OF ITS GAS COST)
ADJUSTMENT PERFORMANCE BASED) Case No. 2024-00205
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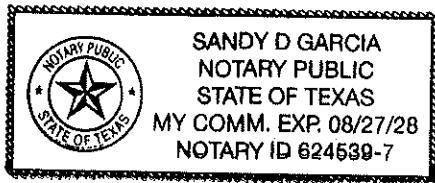
CERTIFICATE AND AFFIDAVIT

The Affiant, Trisha E. Young, being duly sworn, deposes and states that the attached responses to Commission Staff's second request for information are true and correct to the best of her knowledge and belief.

Trisha E. Young
Trisha E. Young

STATE OF LOUISIANA
PARISH OF ORLEANS

SUBSCRIBED AND SWORN to before me by Trisha E. Young on this the 21st day of November, 2024.



Sandy D. Garcia
Notary Public
My Commission Expires August 27, 2024

Case No. 2024-00205
Atmos Energy Corporation, Kentucky Division
Staff DR Set No. 2
Question No. 2-01
Page 1 of 1

REQUEST:

Refer to Atmos's response to Commission Staff's First Request for Information (Staff's First Request), Item 1, Confidential Attachment 1. For each hardcoded value in the Excel spreadsheet, provide the source of the value or a detailed description of how the information was compiled and from what source.

RESPONSE:

- The Commodity Purchase Volume source is the Asset Manager invoices, which have been reviewed and actualized for accuracy, that show baseload and swing purchases.
- The Commodity Discount source is the Addendum between Atmos Energy and the Asset Manager. Any upfront payment and/or supplier discount from Index will be stated in the Addendum.
- Transport Discount Demand source is negotiated Discount Agreements with the pipelines.
- Total Cost before discounts is the Total Transport Cost plus the Total Commodity Cost.
- Total Cost Tier 1 (pre 6/20/22) 2% of Total Cost before discounts multiplied by 19 days divided by 30 days and 9.4% (effective 6/20/2022) of Total Cost before discounts divided by 30 days.
- Atmos KY Share Tier 1 is 30% of Cost Tier 1 at 2% (pre 6/20/22) and 30% of Cost of Tier 1 at 9.4% (effective 6/20/2022).
- Atmos KY Share Tier 2 is 50% is Total Monthly Savings prorated by 19 days less Cost Tier 1 at 2% multiplied by 50%.

Respondent: Ken Skaer

Case No. 2024-00205
Atmos Energy Corporation, Kentucky Division
Staff DR Set No. 2
Question No. 2-02
Page 1 of 1

REQUEST:

Refer to Atmos's response to Staff's First Request, Item 4, regarding the statement, "There have been no months in which actual gas costs exceeded the benchmark." Also, refer to Atmos's response to Staff's First Request, Item 5, page 1 of 2, regarding the statement, "As a result of the swing purchases, the Company incurred an average actual price for supplies purchased in December 2000 in excess of the benchmark price." Reconcile these two statements or explain how these statements are not contradictions of one another.

RESPONSE:

In response to Staff 1-05, Atmos Energy was pointing out instances where the purchase price did exceed the benchmark and where they have risk; however, this was just on specific days, not the entire month. The overall month actual cost did not exceed the benchmark. The response to Staff 1-04 was directly related to a monthly and annual basis.

Respondents: Ken Skaer and Trisha Young

Case No. 2024-00205
Atmos Energy Corporation, Kentucky Division
Staff DR Set No. 2
Question No. 2-03
Page 1 of 1

REQUEST:

Refer to the Direct Testimony of Trisha E. Young, page 5 of 12, lines 1–4.

- a. Provide the monthly average of Inside FERC Index price and NYMEX as used by Atmos as its benchmark for baseload purchases for each month for the period of June 2020 through May 2024.
- b. Provide the monthly Gas Daily Index Midpoints as used by Atmos as its benchmark for swing purchases for each month for the period of June 2020 through May 2024.

RESPONSE:

- a. See Attachment 1. The highlighted cells indicate the months Atmos Energy purchased baseload for that pipeline.
- b. See Attachment 2. The highlighted cells indicate days Atmos Energy purchased swing volumes.

ATTACHMENTS:

Staff_2-03_Att1 - Baseload Purchased.xlsx
Staff_2-03_Att2 - Swing Volumes Purchased.xlsx

Respondent: Trisha Young