

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

**In the Matter of:**

**ELECTRONIC APPLICATION OF )**  
**ATMOS ENERGY CORPORATION )**  
**FOR AN ADJUSTMENT OF RATES; ) Case No. 2024-00276**  
**APPROVAL OF TARIFF REVISIONS; )**  
**AND OTHER GENERAL RELIEF )**

**DIRECT TESTIMONY**  
**AND EXHIBITS**  
**OF**  
**LANE KOLLEN**

**ON BEHALF OF THE**  
**OFFICE OF THE ATTORNEY GENERAL**

**J. Kennedy and Associates, Inc.**  
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**Roswell, GA 30075**

**JANUARY 2025**

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**DIRECT TESTIMONY OF LANE KOLLEN**

**I. QUALIFICATIONS AND SUMMARY**

1

2 **Q. Please state your name and business address.**

3 A. My name is Lane Kollen. My business address is J. Kennedy and Associates, Inc.  
4 ("Kennedy and Associates"), 570 Colonial Park Drive, Suite 305, Roswell, Georgia  
5 30075.

6 **Q. What is your occupation and by whom are you employed?**

7 A. I am a utility rate and planning consultant. I am a Vice President and Principal with  
8 the firm of Kennedy and Associates.

9 **Q. Please describe your education and professional experience.**

10 A. I earned a Bachelor of Business Administration in Accounting degree and a Master of  
11 Business Administration degree from the University of Toledo. I also earned a Master  
12 of Arts degree in Theology from Luther Rice University. I am a Certified Public  
13 Accountant, with a practice license, Certified Management Accountant, and Chartered  
14 Global Management Accountant. I am a member of numerous professional  
15 organizations.

1 I have been an active participant in the utility industry for more than forty  
2 years, both as an employee and as a consultant. Since 1986, I have been a consultant  
3 with Kennedy and Associates and provide services to state government agencies and  
4 consumers of utility services in utility ratemaking, accounting, financial, taxation,  
5 planning, management, and other areas. From 1983 to 1986, I was a consultant with  
6 Energy Management Associates, providing services to investor and consumer owned  
7 utility companies. From 1976 to 1983, I was employed by The Toledo Edison  
8 Company in a series of positions encompassing ratemaking, accounting, financial,  
9 taxation, planning, management, and auditing functions. From 1974 to 1976, I was  
10 employed by a contractor to install underground cable for Ohio Bell Telephone  
11 Company and Buckeye Cablevision.

12 I have provided expert testimony on ratemaking, accounting, taxation,  
13 financing, planning, management, and other issues before regulatory commissions and  
14 courts at the federal and state levels on hundreds of occasions. I have testified in  
15 dozens of proceedings before the Kentucky Public Service Commission  
16 (“Commission”), including the four most recent Atmos base rate cases prior to this  
17 proceeding (2021-00214, 2018-00281, 2017-00349, and 2015-00343). I also testified  
18 in the two most recent Duke Energy Kentucky (“DEK”) natural gas base rate cases  
19 (2021-00190 and 2018-00261) and a Columbia Gas base rate case (2016-00152). In  
20 addition, I have testified in numerous electric base, fuel adjustment clause, and  
21 environmental surcharge ratemaking proceedings involving DEK, Kentucky Power  
22 Company (“KPC”), Kentucky Utilities Company (“KU”), Louisville Gas and Electric  
23 Company (“LG&E”), Big Rivers Electric Corporation, and East Kentucky Power  
24 Cooperative. In addition to my testimony in prior Atmos base rate case proceedings

1 before the Commission, I have testified in multiple Atmos base rate proceedings  
2 before the Georgia Public Service Commission.<sup>1</sup>

3 **Q. On whose behalf are you testifying?**

4 A. I am providing testimony on behalf of the Office of the Attorney General of the  
5 Commonwealth of Kentucky (“AG”).

6 **Q. What is the purpose of your testimony?**

7 A. The purpose of my testimony is to address and make recommendations on specific  
8 issues that affect the base revenue requirement and requested increase in this  
9 proceeding, more specifically, the amount of the net operating loss carryforward  
10 (“NOLC”) deferred tax asset (“DTA”) included in rate base, the Company’s failure to  
11 subtract construction accounts payable reflecting zero cost vendor supplied financing  
12 in accordance with the Commission’s decision on this issue in the prior base rate  
13 proceeding, the Company’s failure to remove all non-cash expenses from the cash  
14 working capital (“CWC”) calculations, and an error understating the Other O&M  
15 expense lag days in the Company’s CWC calculations.

16 I also address and make recommendations in response to the Company’s  
17 requests to: 1) to accelerate the replacement of Aldyl-A pipeline and recover the costs  
18 through Rider PRP, 2) to remove all capital expenditure “caps” imposed by the  
19 Commission in numerous prior Orders on pipeline replacement program (“PRP”) costs  
20 recoverable through Rider PRP and for non-PRP costs recoverable through base  
21 revenues, 3) to authorize a new Tax Rider to recover unknown future tax costs the  
22 Company may incur, including a return on an allocation of an unknown future

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<sup>1</sup> My qualifications and regulatory appearances are further detailed in my Exhibit LK-1.

1 potential AEC consolidated Corporate Alternative Minimum Tax (“CAMT”) DTA  
2 and other potential federal and state tax changes, despite the Commission’s rejection  
3 of a similar rider in the last base rate case proceeding, 4) to authorize a new Pipeline  
4 Modernization (“PM”) Rider to recover future increases in U.S. Department of  
5 Transportation Pipeline and Hazardous Materials Administration (“PHMSA”) capital  
6 related compliance costs, and 5) to “consider” some undefined alternative annual  
7 ratemaking mechanism to set base revenues in lieu of the present base revenue  
8 ratemaking process.

9 Finally, I address whether the Company’s recovery of the cost of discretionary  
10 grants it makes to Research Technology Institute (“GTI”) and recovers through the  
11 Research & Development Rider (“R&D Rider”) should be continued or terminated.

12 **Q. Please summarize your testimony.**

13 A. I recommend three adjustments that reduce the Company’s requested NOLC DTA  
14 included in rate base. The first adjustment is to update the AEC NOLC DTA allocated  
15 to Kentucky under the Company’s methodology in this filing to the actual amount at  
16 September 30, 2024 as the starting point for the calculation of the Kentucky test year  
17 amount. The Company utilized the actual amount at June 30, 2024 as the starting point  
18 reflected in the original filing. The starting point affects the balance carried forward  
19 into the test year in this proceeding. The amount allocated to Kentucky using the  
20 actual AEC NOLC DTA at September 30, 2024 as the starting point under the  
21 Company’s methodology is known and measurable; therefore, the adjustment is  
22 known and measurable.

23 The second adjustment is to reduce the NOLC DTA by the amount the  
24 Company’s calculation exceeds an allocation based on the Company’s methodology

1 used to allocate the AEC NOLC DTA to the Kentucky retail jurisdiction in prior filings  
2 and approved by the Commission.

3 The third adjustment is to reduce the NOLC DTA to reflect an amount required  
4 by the Internal Revenue Code (“IRC”), Treasury Regulations, and relevant Internal  
5 Revenue Service (“IRS”) Private Letter Rulings (“PLRs”) necessary to avoid a  
6 “normalization violation.” However, I note the amount that I calculated still is  
7 excessive due to the Company’s inability and/or unwillingness to provide detailed  
8 historic data necessary to reduce this amount further. This adjustment includes the  
9 portion of the NOLC DTA that the IRS asserts is caused by tax depreciation in excess  
10 of book depreciation in rate base, but excludes the portion of the NOLC DTA that the  
11 IRS assumes is not caused by tax depreciation in excess of book depreciation. The  
12 NOLC DTA caused by tax depreciation in excess of book depreciation is the only  
13 temporary difference that is addressed by the “normalization rules” and required to be  
14 included in rate base.

15 I recommend the Commission reduce rate base by the average monthly  
16 construction accounts payables. These amounts are zero-cost vendor supplied  
17 financing, which displaces what otherwise would be investor supplied equity and debt  
18 financing. The Commission decided this issue in the Company’s prior base rate case  
19 proceeding, yet the Company failed to reflect this reduction in rate base in this case.

20 I recommend the Commission remove depreciation expense, deferred tax  
21 expense, and the growth component of the return on equity expense from the CWC  
22 calculations. These are non-cash expenses. The Commission does not allow non-cash  
23 expenses in the CWC calculation. I agree with the Company and recommend the

1 Commission include the dividend yield component of the return on equity in the CWC  
2 calculations. This component of the return on equity is a cash expense.

3 I recommend the Commission correct an error in the Company's calculation of  
4 the Other O&M expense lag days that overstates the Company's CWC included in rate  
5 base.

6 I recommend the Commission deny the Company's request to remove the  
7 capital expenditures caps altogether on the costs recovered through the PRP and  
8 through base revenues. The Commission implemented caps and has maintained caps  
9 in prior Commission Orders due to the Company's failure to control the costs of its  
10 bare and coated steel pipeline replacements recoverable through the PRP and to  
11 complete the replacements on schedule, among other problems noted in those prior  
12 Commission Orders.

13 I recommend the Commission deny the Company's request to expand the PRP  
14 program to include Aldyl-A pipe and to recover those costs through the PRP rider. I  
15 recommend the Commission continue its practice of allowing selective recovery of the  
16 costs to replace specific identifiable Aldyl-A pipeline segments for high priority safety  
17 and operational reasons through the PRP.

18 I recommend the Commission deny the Company's request for a new PM  
19 Rider. The proposed PM Rider would significantly change the existing ratemaking  
20 paradigm and allow the Company to circumvent the annual capital expenditures caps  
21 in the PRP Rider and the base revenues.

22 I recommend the Commission deny the Company's request for a new Tax  
23 Rider. The Company's latest proposal is nearly identical to and suffers from the same  
24 infirmities as a similar rider it proposed in the prior base rate case, which the



1 Commission rejected. The Commission already has the capability to address changes  
2 in the federal and state tax codes, including changes in income tax rates, without a  
3 TAAF rider. The Commission demonstrated this capability in response to the Tax  
4 Cuts and Jobs Act enacted in December 2017 through both generic and utility-specific  
5 proceedings.

6 I recommend the Commission reject the Company's request to "consider" an  
7 annual rate review mechanism. There already is a statutory framework relied on by the  
8 Commission for setting base revenues. The Company has no specific proposal for an  
9 annual rate review mechanism other than a highly generalized term for it and a  
10 reference to one that has been adopted by another Commission.

11 Finally, I recommend the Commission terminate the recovery of discretionary  
12 grants the Company makes to GTI and recovers through the R&D Rider.

## 13 **II. NET OPERATING LOSS CARRYFORWARD DEFERRED TAX ASSET**

### 14 **A. Update Starting Point for NOLC DTA in Test Year from June 30, 2024 to** 15 **September 30, 2024**

#### 16 **Q. Describe generally the Company's calculation of the NOLC DTA in the test year.**

17 A. The Company included an NOLC DTA of \$28.444 million as an addition to rate base.  
18 The Company calculated the asset NOLC ADIT in four steps. In the first step, it  
19 disaggregated the total NOLC and NOLC DTA for Atmos Energy Corporation, Inc.  
20 ("AEC"), the parent company filing a consolidated federal income tax return, into  
21 three amounts, one for the AEC Utility divisions, one for Atmos Energy Holdings, Inc.  
22 ("AEHI"), also owned by AEC, and one for Other.<sup>2</sup> AEHI is the holding company for

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<sup>2</sup> Refer to the response to AG 1-33 and the response to AG 1-34. The response to AG 1-33 provides an AEC entity organizational chart showing AEC as the parent company, which files the federal consolidated tax

1 AEC's unregulated entities. The AEC Utility NOLC and NOLC DTA are significantly  
2 larger than the AEC consolidated NOLC and NOLC DTA. AEHI and Other have no  
3 NOLC and no NOLC DTA based on this disaggregation because AEHI was able to  
4 utilize the AEC Utility NOLC to reduce the AEC consolidated federal taxable income,  
5 NOLC, and NOLC DTA.<sup>3</sup> More specifically, the AEC consolidated NOLC DTA was  
6 \$399.122 million, the AEC Utility NOLC DTA was \$577.388 million, and the AEC  
7 Other NOLC DTA was \$8.132 million in the test year on a 13-month average basis.<sup>4</sup>

8 In the second step, the Company allocated the AEC Utility NOLC DTA for all  
9 AEC utility divisions at September 30, 2021 to the Kentucky division for ratemaking  
10 purposes using an AEC general (composite) factor.<sup>5</sup> The AEC Utility NOLC and  
11 NOLC DTA reflect the cumulative unutilized taxable losses carried forward to that  
12 date due to the taxable losses of all utility divisions with the sole exclusion of the  
13 taxable losses due to Winter Storm Uri that affected only some of the AEC utility  
14 divisions. In other words, except for the effects of Winter Storm Uri, the AEC Utility  
15 NOLC DTA at September 30, 2021 reflects all income and all deductions of all the  
16 AEC utility divisions regardless of the actual income and deductions of each division.  
17 The Company's calculation assumes further that each AEC utility division contributed  
18 to the carryforward NOLs and the NOL DTA in proportion to the composite factor  
19 allocators regardless of the actual taxable income and deductions of each division. The

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return and is the entity owning the regulated divisions and AEHI, and AEHI as the entity owning all the AEC unregulated entities. The response to AG 1-34 describes each of the three disaggregated NOLC DTA amounts (Utility, Unregulated, and Other). I have attached a copy of the response to AG 1-33 as my Exhibit LK-2 and the response to AG 1-34 as my Exhibit LK-3.

<sup>3</sup> Refer to the response to AG 1-34. The Other amount is for GAAP purposes to record the federal benefit of a state tax expense reserve due to uncertain tax positions.

<sup>4</sup> Refer to the response to AG 1-34.

<sup>5</sup> Refer to the response to AG 1-34: "the Company has historically allocated the Utility NOL to each of its operational jurisdictions based on the same factors used to allocate general office rate base."

1 Company claims that it does not have sufficient information to calculate the actual  
2 NOLCs and NOLC DTAs for each division.<sup>6</sup> Despite that claim, the Company  
3 acknowledged that it does have sufficient detailed information to calculate the actual  
4 NOLs and NOL DTAs for each division based on the historic tax depreciation  
5 deductions in excess of the book depreciation deductions for each division.

6 In the third step, the Company calculated the changes in the NOLC DTA for  
7 the Kentucky division on a standalone basis through June 30, 2024 in its Application,  
8 which it subsequently updated through September 30, 2024 in response to Staff  
9 discovery.<sup>7</sup> The Company then assumed no change in the NOLC DTA until the test  
10 year, which begins April 1, 2025 and ends March 31, 2026, meaning that it assumed  
11 there was and will be no taxable income to reduce the NOLC and the NOL DTA during  
12 the six-month period between September 30, 2024 and March 31, 2025.

13 In the fourth step, the Company calculated the taxable income and the  
14 reduction in the NOLC and NOLC DTA in the test year. After the first three steps,  
15 the NOLC DTA was \$34.259 million. In the fourth step, the Company reduced the  
16 NOLC DTA by \$5.815 million<sup>8</sup> to the \$28.444 million included in rate base.

17 **Q. Is the Company's allocation of the tax benefits generated by the AEC utilities to**  
18 **AEHI reasonable?**

19 A. No. The tax savings resulting from the ability of the AEHI entities to utilize the tax  
20 losses of the AEC utility divisions should be allocated to the AEC utility divisions.  
21 Instead, the savings are retained by AEC and a hypothetical cost that is not actually

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<sup>6</sup> Response to AG 1-40(e). I have attached a copy of this response as Exhibit LK-4.

<sup>7</sup> Exhibit JJM-1.

<sup>8</sup> Application at Schedule B.5F

1 incurred by AEC or any other entity is allocated to each of the AEC utility divisions,  
2 including the Kentucky division.

3 **Q. What is your recommendation?**

4 A. I recommend the Commission take this into consideration when considering the  
5 second and third adjustments to the NOLC DTA that I recommend, especially my third  
6 recommendation to include only the NOLC DTA that is caused by tax depreciation in  
7 excess of book depreciation to avoid potential normalization violations.

8 **Q. Describe the Company's update to change the starting date for the NOLC DTA**  
9 **from June 30, 2024 to September 30, 2024 in response to Staff discovery.**

10 A. The Company provided an update to reflect the reduction in the NOLC DTA based on  
11 the Kentucky division's actual taxable income during the three months after June 2024  
12 through September 2024. The Kentucky division had positive taxable income during  
13 those three months and was able to utilize a portion of the NOLC and thereby reduce  
14 the NOLC DTA as of September 30, 2024.

15 **Q. Should this update be reflected as a reduction to the Company's requested base**  
16 **revenue increase?**

17 A. Yes. At a bare minimum, the Commission should adopt this adjustment to reduce the  
18 excessive NOLC DTA included in the Company's original filing. The update through  
19 September 30, 2024 provides the starting point for the Company's test year calculation  
20 of the NOLC DTA. Pursuant to its methodology, the Company left this NOLC DTA  
21 calculated for the Kentucky division unchanged until the test year and then reduced it  
22 further in the final step of its calculations for the taxable income in the test year.

23 **Q. What are the effects of your recommendation?**

24 A. The effects are a reduction of \$0.794 million in rate base and \$0.085 million in the

1 requested base revenue increase.<sup>9</sup>

2 **Q. Is the Company’s assumption reasonable that the asset NOLC DTA will remain**  
3 **unchanged from September 30, 2024 through March 31, 2025?**

4 A. No. This methodology incorrectly assumes that there was and will be no AEC utility  
5 taxable income and/or no Kentucky rate division taxable income after September 30,  
6 2024 through March 31, 2025.

7 **Q. What is your recommendation?**

8 A. I recommend the Commission take this into consideration when considering the  
9 second and third adjustments to the NOLC DTA that I recommend. The NOLC DTA  
10 should be less due to taxable income during this six month “bridge” period; however,  
11 the Company failed to quantify this amount and failed to provide the information  
12 required to calculate this amount in response to AG discovery.<sup>10</sup> The Company has  
13 the burden to demonstrate that its forecast test year amounts are reasonable, yet its  
14 methodology ignores the taxable income for the “bridge” period and the reduction in  
15 the NOLC DTA. The Commission should adopt the second and third adjustments that  
16 I recommend in order to minimize the NOLC DTA included in rate base.

17 **B. Use AEC Utility NOLC DTA Allocation Methodology from Prior Proceedings in**  
18 **Lieu of Company’s Proposed Direct Kentucky Division Calculation for Tax**  
19 **Years 2022, 2023, and 2024**

20 **Q. Describe the Commission directive in Case 2021-00214 regarding the allocation**  
21 **of the AEC Utility NOLC DTA to the Kentucky division.**

22 A. In the Company’s prior base rate proceeding, the AG disputed the NOLC DTA amount  
23 included in rate base, in part based on the fact that the AEC Utility NOLC and NOLC

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<sup>9</sup> All of my calculations are reflected in the electronic workpapers of AG witness Randy Futral.

<sup>10</sup> Response to AG 1-40(e). See Exhibit LK-4.

1 DTA was the aggregate of all AEC utility divisions, not solely the Kentucky division.

2 In its Order in the prior proceeding, the Commission stated:

3 Thus, in light of the potentially significant losses being incurred by other  
4 divisions that might be assigned to Kentucky customers, the Commission finds  
5 that Atmos Kentucky’s failure to identify and allocate NOLs to specific utility  
6 divisions is unreasonable going forward.  
7

8 Atmos Kentucky must now track the generation and utilization of NOL ADIT  
9 for Kentucky in each fiscal year on a standalone basis based on the expenses  
10 incurred and revenue generated from regulated operations in Kentucky,  
11 including any revenue from Atmos Kentucky’s performance-based rates,  
12 without regard to losses incurred by other jurisdictions. **In future applications  
13 to increase base rates, Atmos Kentucky must file a report** showing the  
14 generation and utilization of NOL ADIT for Kentucky since this Order based  
15 on the expenses incurred and revenue generated from Kentucky operations. If  
16 Atmos Kentucky proposes to use a different method to reflect the generation  
17 and utilization of NOL ADIT for Kentucky in its revenue model in such cases,  
18 Atmos Kentucky must explain in detail why using that method would be  
19 reasonable. [emphasis added]  
20

21 **Q. How did the Company respond to this Commission directive?**

22 A. The Company did not prepare or file any such “report” as the Commission mandated.  
23 Instead, it incorporated a new allocation methodology in its filing, ostensibly to  
24 comply with the Commission directive, that *increased* the NOLC DTA in rate base  
25 and the effect on the revenue requirement compared to the methodology used in the  
26 prior base rate proceeding. In lieu of the prior allocation methodology based on the  
27 last month for which actual information in the base year was available as the starting  
28 point for forecasting the NOLC DTA in the test year, the Company’s new  
29 methodology first fixed the NOLC DTA at September 31, 2021 based on the prior  
30 allocation methodology, as I noted in my earlier description of the Company’s  
31 methodology. It then calculated the changes in the NOLC DTA for the Kentucky  
32 division, but also included allocations of the taxable income to the Kentucky division

1 from divisions 002, 012, and 091, as I noted in my earlier description of the Company's  
2 methodology. It also ignored the taxable income for the nine months after the June  
3 30, 2024 date used for this purpose in its filing until the beginning of the test year on  
4 April 1, 2025.

5 **Q. Is the Company's new methodology reasonable?**

6 A. No. This new hybrid methodology is not reasonable and does not address the  
7 underlying problems with the Company's former allocation methodology retained in  
8 part, and instead introduces new problems. The new methodology results in a *greater*  
9 amount of the AEC Utility NOLC DTA allocated to the Kentucky division, not less.  
10 It still includes the effects of taxable losses and deductions of all other AEC utility  
11 divisions through September 2021 and still continues to include the effects of all  
12 deductions for divisions 002, 012, and 091 even though many of those temporary  
13 differences are not recognized as expenses for ratemaking in Kentucky. As I noted  
14 previously, it also fails to include the taxable income and the reductions in the NOLC  
15 and NOLC DTA during the "bridge" period from July 1, 2024 through March 31, 2025  
16 in its filing and from October 1, 2024 through March 31, 2025 in its update response  
17 to Staff discovery.

18 **Q. What is your recommendation?**

19 A. I recommend the Commission retain the prior allocation methodology for this case if  
20 it does not adopt the methodology reflected in my third adjustment. The correct and  
21 most accurate methodology would be to calculate the Kentucky division NOLC DTA  
22 from the first year in which there was an NOLC on a Kentucky division standalone  
23 basis. The Company did not do so. Nor would the Company provide the information

1 necessary to make this calculation in response to AG discovery.<sup>11</sup> The Company's  
2 calculations in this case are not an improvement and do not achieve that goal.

3 The Company's efforts in this case to not develop and provide that information  
4 in this and prior proceedings in which the NOLC DTA was an issue are clearly  
5 obfuscatory and should not be rewarded. The information can be developed; the  
6 Company simply chose and continues to choose not to develop and provide it.  
7 Furthermore, as I subsequently describe in conjunction with my third  
8 recommendation, the Company's methodology still fails to address and does not  
9 exclude the NOLC DTA that is not caused by tax depreciation in excess of book  
10 depreciation, the only NOLC DTA that is required to be included in rate base by the  
11 "normalization rules."

12 **Q. What are the effects of your recommendation?**

13 A. The effects are a reduction of \$6.481 million in rate base and \$0.690 million in the  
14 base revenues requested.

15 **C. Add Only the NOLC DTA Caused by Tax Depreciation in Excess of Book**  
16 **Depreciation to Rate Base Necessary to Avoid a Normalization Violation**

17 **Q. Describe the normalization requirements set forth in the Internal Revenue Code**  
18 **and the related Treasury Regulations.**

19 A. The Internal Revenue Code of 1986 as amended ("IRC") and related Treasury  
20 Regulations require that the portion of an NOLC DTA caused by tax depreciation in  
21 excess of book depreciation must be added to rate base to avoid a normalization  
22 violation and the potential loss of the accelerated depreciation in excess of book

---

<sup>11</sup> *Id.*



1 depreciation for federal tax return purposes. A series of IRS Private Letter Rulings  
2 assert this causation determination must be made under the assumption that  
3 depreciation represents the last deduction and thus, the proximate cause, of a taxable  
4 loss, if any, in any tax year. To the extent there is taxable income in a subsequent year,  
5 then the regulator may reasonably assume that the NOLC caused by tax depreciation  
6 in excess of book depreciation under this determination is used first when reducing the  
7 NOLC and related NOLC DTA by taxable income in a subsequent tax year. Neither  
8 the IRC nor the Regulations proscribe such a methodology for ratemaking purposes.<sup>12</sup>

9 The Company summarized the normalization requirements in response to AG  
10 discovery as follows:<sup>13</sup>

11 Based on Internal Revenue Code (“IRC”) section 168(f)(2), 168(i)(9) and  
12 1.167(I)-1, decreasing taxpayer’s rate base by the full amount of its ADIT  
13 account balance without reducing it by the taxpayer’s NOLC-related account  
14 balance resulting from accelerated tax depreciation in excess of *book*  
15 *depreciation used for regulatory purposes in cost of service* would be a  
16 violation of the normalization rules.”

17 \*\*\*

18  
19  
20 Accelerated tax depreciation *in excess of book depreciation used for regulatory*  
21 *purposes in cost of service* is subject to the normalization provisions.

22  
23 Cumulative NOLC [net operating loss carryforward] which is the result of  
24 accelerated tax depreciation *in excess of book depreciation used for regulatory*  
25 *purposes* is likewise subject to the normalization rules.

26  
27 The determination of NOLC attributable to accelerated depreciation *in excess*  
28 *of book depreciation used for regulatory purposes* must be determined using a  
29 last dollar deducted methodology.  
30

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<sup>12</sup> I note the Company did not track separately the NOLC and related NOLC DTA for tax depreciation in excess of book depreciation because it included the entirety of the NOLC DTA in rate base under its methodology.

<sup>13</sup> Response to AG 2-09(a) and (b). I have attached a copy of this response as Exhibit LK-5.

1 **Q. Why are the normalization requirements relevant to the NOLC DTA included in**  
2 **rate base in this proceeding?**

3 A. Fundamentally, the only NOLC DTA that is required to be included in rate base to  
4 avoid a normalization violation is the portion caused by tax depreciation in excess of  
5 book depreciation in those tax years in which there was a taxable loss, the effects of  
6 which remain in the NOLC and in the NOLC DTA in the test year.<sup>14</sup>

7 **Q. What portion of the NOLC DTA was caused by tax depreciation in excess of book**  
8 **depreciation?**

9 A. I calculated the *maximum* amount of the NOLC DTA caused by tax depreciation in  
10 excess of book depreciation of \$15.272 million for the test year. The actual amount  
11 of the NOLC DTA caused by tax depreciation in excess of book depreciation  
12 remaining in the NOLC DTA in the test year would be less, likely much less.  
13 However, as I previously noted, the Company was unwilling to provide the historic  
14 information necessary to trace the tax depreciation in excess of book depreciation by  
15 tax year on a last dollar deducted methodology necessary to calculate the lesser amount  
16 of the NOLC DTA.<sup>15</sup>

17 The maximum amount of the NOLC DTA required to be added to rate base to  
18 avoid a normalization violation is equal to the deferred tax liability (“DTL”) for the  
19 excess of tax depreciation over book depreciation. In other words, by definition, the  
20 NOLC DTA caused by tax depreciation in excess of book depreciation can never be

---

<sup>14</sup> In its Order in Case 2023-00231, in which the NOLC ADIT was an issue for the PRP Rider, the Commission stated: “Normalization rules only apply to ADIT arising from accelerated tax depreciation, and the IRS has specifically stated that normalization rules do not apply to ADIT associated with repair deductions. [Note: original footnote 21 from this Commission Order is omitted]. Thus, the bulk of the ADIT generated in Atmos’s 2023 and 2024 fiscal years would not be subject to normalization rules, and therefore, it would not be necessary to include NOL ADIT, if any, offsetting that ADIT liability to avoid a normalization violation.”

<sup>15</sup> Refer to the response to AG 1-40(e). See Exhibit LK-4.

1 greater than the DTL caused by tax depreciation in excess of book depreciation.  
2 However, it can be less if the taxable loss in any tax year was less than the tax  
3 depreciation in excess of book depreciation and reduced even further if there was or  
4 will be taxable income in subsequent years used to reduce the NOLCs caused by tax  
5 depreciation in excess of book depreciation.

6 The Company provided the DTL for the Kentucky division and the DTLs  
7 allocated from divisions 002, 012, and 091 to the Kentucky division caused by tax  
8 depreciation in excess of book depreciation in its filing for the two tax years 2022 and  
9 2023, and the first nine months of tax year 2024,<sup>16</sup> which it subsequently updated to  
10 the entire tax year 2024 in response to Staff discovery.<sup>17</sup> The DTLs for the Kentucky  
11 division and each of the other divisions are shown on the tabs for each division as  
12 “depreciation adjustment” with an adjustment code of “FXA02.” The Company  
13 identified these DTLs as those representing exclusively the tax depreciation in excess  
14 of book depreciation in response to AG discovery.<sup>18</sup>

15 I then summed the Kentucky DTL and the allocations to Kentucky of the  
16 division 002, 012, and 019 DTLs as of September 30, 2021, the same date used by the  
17 Company in step two of its calculation of the NOLC DTAs I previously described. I  
18 then calculated the additional DTLs caused by tax depreciation in each of the tax years  
19 2022, 2023, and 2024, and then in the test year to determine the increase in the NOLC

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<sup>16</sup> Exhibit JJM-1.

<sup>17</sup> Attachment 1 to response to Staff 3-04. I have attached a copy of this response as Exhibit LK-6.

<sup>18</sup> Response to AG 2-10(c), which states: “The temporary differences included in FXA02 include the differences between tax and book depreciation.” Only the temporary differences reflected in FXA02 are subject to the normalization rules. The basis differences included in adjustment code FXA01 and in all other adjustments codes are not subject to the normalization rules because they are not caused by tax depreciation in excess of book depreciation. I have attached a copy of this response as Exhibit LK-7.

1 DTA in tax year 2022 due to tax depreciation in excess of book depreciation and the  
2 reductions in tax years 2023 and 2024 and then for the test year as forecast by the  
3 Company in its calculations.

4 I did not include the taxable income for the bridge months of October 2024  
5 through March 2025 due to the Company's unwillingness to provide this information,  
6 but subsequently recommend the Commission direct the Company to provide this  
7 information in future base rate proceedings.

8 **Q. What are your recommendations?**

9 A. I recommend first, and for this proceeding only, the Commission include only the  
10 portion of the NOLC DTA caused by tax depreciation in excess of book depreciation  
11 in rate base. This is the *maximum* amount that is required in order to avoid a  
12 normalization violation.

13 I also recommend the Commission direct the Company to provide the  
14 information necessary to calculate the *minimum* NOLC DTA necessary to avoid a  
15 normalization violation in its *next* base rate case filing. For this purpose, I recommend  
16 the Commission direct the Company to develop this information historically on a  
17 Kentucky division basis (as well as for the allocations from divisions 002, 012, and  
18 091) starting in the first year there was an NOLC for the Kentucky division, assuming  
19 that tax depreciation in excess of book depreciation was the last dollar deduction in  
20 the Kentucky division taxable loss years, and assuming that the taxable income in each  
21 subsequent tax year is first used to reduce the NOLC for the tax depreciation in excess  
22 of book depreciation.

23 I also recommend the Commission direct the Company to include the "bridge"  
24 months in its NOLC and NOLC DTA calculations extending from the last month for

1 which there is actual information in the base year through the last month in the forecast  
2 test year.

3 **Q. What are the effects of your recommendation?**

4 A. The adjusted NOLC DTA in rate base after the three adjustments that I recommend is  
5 \$15.272 million. The effects of this third adjustment are incremental reductions of  
6 \$5.896 million in rate base and \$0.627 million in the base revenues requested.

7 **Q. Why should the Commission include allocations of the tax depreciation in excess**  
8 **of the book depreciation from divisions 002, 012, and 091 in the calculation of the**  
9 **NOLC DTA for the Kentucky division?**

10 A. This is necessary to ensure there is a matching of these temporary differences and the  
11 effects on the DTLs and NOLC DTAs to the plant and accumulated depreciation  
12 amounts allocated from these three other divisions to the Kentucky division rate base.  
13 The Company is allowed to include a grossed-up return on these allocated net plant  
14 amounts, less the DTL caused by tax depreciation in excess of book depreciation,  
15 included in its Kentucky rate base. This return plus or minus the temporary differences  
16 results in taxable income or losses.

17 **Q. Why should the Commission include only the NOLC DTA caused by the tax**  
18 **depreciation in excess of book depreciation in rate base?**

19 A. First and foremost, this is the only mandate under the federal tax normalization rules.  
20 The federal tax normalization rules do not address the NOLCs and related NOLC  
21 DTAs caused by temporary differences other than tax depreciation in excess of book  
22 depreciation, including deductions for non-depreciation expenses that are not allowed  
23 for Kentucky ratemaking purposes.

24 Second, it is a precise methodology that specifically calculates the Kentucky

1 division NOLCs and NOLC DTAs caused by tax depreciation in excess of book  
2 depreciation; it does not rely on the aggregate taxable income or losses of all AEC  
3 utilities or allocations of these aggregate amounts to the Kentucky division.

4 Third, it addresses, in part, the ability of AEC on its federal consolidated tax  
5 return, through the taxable income of its AEHI unregulated entities, to utilize and  
6 monetize the value of the Kentucky division taxable losses not caused by tax  
7 depreciation in excess of book depreciation. The Company's prior methodology and  
8 the methodology proposed in this proceeding impose a hypothetical cost on the  
9 Kentucky division that AEC does not actually incur because the AEC total NOLC  
10 DTA contributed by the AEC utility divisions has been reduced by the taxable income  
11 of the AEHI, AEC's unregulated entities. AEC retains those income tax savings even  
12 though it was the AEC utility divisions that caused those losses used by AEHI.

### 13 **III. CONSTRUCTION ACCOUNTS PAYABLE ZERO COST FINANCING**

14 **Q. Describe the accounts payable financing.**

15 A. On a recurring and ongoing basis, the Company temporarily finances its capital  
16 expenditures for plant and other assets as well as operating expenses through delayed  
17 payments to its vendors recorded as accounts payable. This vendor financing is zero  
18 cost and avoids equity and debt investor financing at their respective costs.

19 **Q. Has the Commission previously determined that construction accounts payable**  
20 **should be subtracted from rate base?**

21 A. Yes. In Case 2021-00214, the AG recommended the Commission subtract  
22 construction accounts payable from rate base. The Company opposed this adjustment

1 in its rebuttal testimony. The Commission agreed with the AG, citing its recent  
2 precedent to subtract such accounts payable amounts in other cases, and stated:

3 In a number of recent base rate cases where the revenue requirement is determined  
4 using rate base, the Commission has accepted adjustments to remove accounts  
5 payable from working capital amounts because the utility does not finance these  
6 amounts. The same reasoning exists here. Therefore, the Commission finds that  
7 this adjustment is reasonable and is accepted.<sup>19</sup>  
8

9 **Q. Did the Company seek rehearing on this issue in the last base rate proceeding?**

10 A. No.

11 **Q. Did the Company subtract construction accounts payable from rate base in this  
12 proceeding, consistent with the Commission's Order in the last base rate case?**

13 A. No.

14 **Q. Did any Company witness address the subtraction of construction accounts  
15 payable from rate base in this proceeding?**

16 A. No.

17 **Q. Alternatively, did the Company address construction accounts payable in the  
18 CWC calculations?**

19 A. No. The CWC calculations do not include balance sheet assets or liabilities. The CWC  
20 calculations address only the lags in revenues and expenses.

21 **Q. What is your recommendation?**

22 A. I recommend the Commission reduce rate base for the construction accounts payable.  
23 This is cost-free financing provided by the Company's vendors, not financing provided  
24 by its investors, and construction accounts payable should be subtracted from rate base

---

<sup>19</sup> Case No. 2021-00214, Final Order dated May 19, 2022, at 17.

1 in the same manner that materials and supplies, prepayments, and other working  
2 capital costs incurred prior to capitalization or expense are added to rate base.

3 **Q. What is the effect of your recommendation?**

4 A. The effect is a reduction in rate base of \$5.312 million and a reduction in the base  
5 revenue increase of \$0.565 million.

6 **IV. NON-CASH EXPENSES IMPROPERLY INCLUDED IN CASH WORKING**  
7 **CAPITAL AND OTHER O&M EXPENSE LAG DAY ERROR**

8 **A. Exclude Non-Cash Expenses Improperly Included In Cash Working Capital**

9 **Q. Describe the Company's CWC included in rate base.**

10 A. The Company included CWC in rate base of *negative* \$2.200 million calculated using  
11 a lead/lag study approach.<sup>20</sup>

12 **Q. Did the Company include *non-cash* expenses in its CWC calculations?**

13 A. Yes. The Company included *non-cash* depreciation expense, *non-cash* deferred  
14 income tax expense, and the *non-cash* growth component of the return on equity in its  
15 CWC calculations. The Company included these *non-cash* expenses using 34.63  
16 revenue lag days offset by 0 expense lag days for each of the *non-cash* expenses. This  
17 approach for the non-cash expenses results in an increase of \$9.817 million in the  
18 CWC added to rate base, all else equal.

19 **Q. Should the CWC calculations include *non-cash* expenses such as depreciation  
20 expense?**

21 A. No. Fundamentally, the purpose of the lead/lag study and CWC calculations is to  
22 quantify the *cash* investment provided by either investors (positive) or customers

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<sup>20</sup> Exhibit JTC-4 Lead Lag Study at page 2 attached to the Direct Testimony of Joe T. Christian. I have attached a copy of this schedule as my Exhibit LK-8 for ease of reference.



1 (negative) on average for the delay in cash revenues to recover cash expenses incurred  
2 over the course of the lead/lag study period and the CWC calculations for the test year.  
3 The return on *non-cash* expenses, such as depreciation expense, is separately reflected  
4 in the return on balance sheet amounts included in rate base, such as plant in service  
5 less accumulated depreciation. There never will be a cash disbursement for  
6 depreciation expense. The cash disbursement on plant in service amounts was made  
7 when the construction cost was incurred and capitalized to construction work in  
8 progress or directly to plant in service. The net accumulated depreciation and  
9 accumulated deferred income taxes are subtracted from rate base, but only on a lagged  
10 basis. This allows the Company to retain the carrying charge value of this non-cash  
11 expense in the calculation of rate base and between rate cases.

12 **Q. To the extent the Commission allows *non-cash* expenses in the CWC calculations,**  
13 **is the Company's assumption of 0 expense lag days for this purpose correct?**

14 A. No. The Company's use of 0 days incorrectly assumes that the depreciation expense  
15 actually is paid in cash at midnight on the first day of the month in which it is recorded.  
16 As noted previously, the Company never disburses cash for depreciation expense, let  
17 alone disbursing cash instantaneously as assumed by the Company. If the non-cash  
18 expenses are included in the CWC calculations, then the correct expense lag days is  
19 infinity days, not 0 days. If infinity days are used for this purpose, then it would  
20 properly negate the effects of including the *non-cash* expenses in the CWC  
21 calculations.

22 **Q. Company witness Joe Christian asserts that depreciation expense should be**  
23 **included in the CWC calculation even though it is *non-cash* because rate base is**  
24 **calculated at month end. Is this assertion correct?**

1 A. No. Depreciation expense is not recorded in the accounting process for each month  
2 until the end of that month. It is not recorded on the first day of the month. Rate base  
3 is calculated at the beginning of the month for 12 of the 13 months used in the 13-  
4 month average. The 13-month average for each component of rate base, including  
5 plant in service and accumulated depreciation, consists of 12 months of *beginning*  
6 balances, for the months of April 2025 through March 2026, and one month of ending  
7 balances, specifically for March 2026 only.

8 As a result of the 13-month average methodology, the Company is allowed a  
9 return on the current month depreciation expense for 12 of the 13 months because the  
10 expense is not added to accumulated depreciation and used to reduce rate base until  
11 the end of the current month, with the sole exception of the last month in the test year,  
12 which essentially negates this differential for that month only. In other words, the 13-  
13 month average methodology provides the Company a return on plant additions during  
14 the last month of the test year as if the additions had been in service at the beginning  
15 of the month in exchange for the assumption of no return on the depreciation expense  
16 and increase in accumulated depreciation during that same month. The 13-month  
17 average provides a greater return on the plant additions during the month than the lost  
18 return on the accumulated depreciation during the month, does not justify including  
19 the *non-cash* depreciation expense in the CWC calculations, and certainly does not  
20 justify including 12 month of *non-cash* depreciation expense in the CWC calculations.

21 The Company's calculations include the depreciation expense in rate base  
22 twice, once through the use of the beginning balances of accumulated depreciation for  
23 12 months during the test year and then a second time through the CWC calculation.  
24 The Company's use of 0 depreciation expense lag days in the lead/lag calculation of

1 CWC assumes incorrectly that the *non-cash* depreciation expense is paid in cash at the  
2 beginning of each month when incurred, so that it is allowed a return in the CWC  
3 calculation for the difference in the revenue lag days and the 0 days depreciation  
4 expense lag days assumed in the Company's calculation.

5 **Q. Did the Commission already decide this issue in Case 2021-00214?**

6 A. Yes. The Company made the same arguments to include non-cash expenses in the  
7 CWC calculations, including the same arguments to include depreciation expense in  
8 those calculations, in that prior base rate proceeding. The Commission rejected those  
9 arguments stating: "Noncash expenses are not appropriate to include in the CWC  
10 determination. The Commission finds that noncash items should be removed from the  
11 lead/lag study."<sup>21</sup>

12 **Q. Did the Commission exclude the entirety of the return on equity from the CWC**  
13 **calculations as a *non-cash* expense in the last base rate proceeding?**

14 A. Yes. The entirety of the return on equity was one of the *non-cash* expenses removed  
15 by the Commission in the last base rate proceeding.

16 **Q. Is the entirety of the return on equity actually a *non-cash* expense?**

17 A. No. There are two components to the return on equity, one that is a *cash* expense and  
18 one that is a *non-cash* expense. The dividend component of the return on equity  
19 included in the base revenue requirement actually represents a *cash* disbursement and  
20 thus, actually is a *cash* expense. The Company pays a *cash* dividend to its shareholders  
21 on a quarterly basis. As a *cash* expense, it is properly included in the CWC  
22 calculations, by definition.

---

<sup>21</sup> Case No. 2021-00214, Final Order dated May 19, 2022 at 20.

1           The non-dividend component of the return on equity included in the base  
2 revenue requirement is a *non-cash* expense. The non-dividend component of the  
3 return on equity reflects the growth component under the discounted cash flow  
4 (“DCF”) formula historically relied on by the Commission, which does not result in a  
5 cash disbursement and therefore is a *non-cash* expense. As a *non-cash* expense, the  
6 non-dividend component of the return on equity is properly excluded on that basis  
7 from the CWC calculations, also by definition.

8 **Q. What is your recommendation?**

9 A. I recommend the Commission exclude all *non-cash* expenses from the CWC  
10 calculations, including the growth component of the return on equity expense. *Non-*  
11 *cash* expenses do not belong in the CWC calculation, by definition. The CWC  
12 calculations expressly address the lag in *cash* revenue recovery compared to the lag in  
13 *cash* payments for expenses incurred. The Commission has already decided this issue  
14 and rejected the same arguments offered in the last base rate case proceeding.

15 **Q. What are the effects of your recommendation?**

16 A. The effects are to reduce the CWC included in rate base by \$9.817 million and to  
17 reduce the base revenue increase by \$1.045 million. In the calculation of the cash  
18 dividend and *non-cash* non-dividend components of the return on equity expense, I  
19 utilized the adjusted rate base addressed and recommended by Witness Futral,  
20 including the adjustments that I address and recommend, the adjusted equity ratio and  
21 the return on equity addressed and recommended by AG Witness Richard Baudino,  
22 and the dividend yield of the comparison (proxy) group relied on for the return on

1 equity by Witness Baudino.<sup>22</sup> I revised the expense lag days from the incorrect 0 days  
2 included in the Company's CWC calculation to reflect AEC's 114.4 dividend expense  
3 lag days based on its actual dividend history.<sup>23</sup>

4 **B. Correct Company's Calculation of Non-Labor O&M Expense Lag Days**

5 **Q. Describe the Company's calculation of third-party vendor non-labor O&M**  
6 **expense lag days.**

7 **A.** The Company calculated the third-party vendor expense lag days from the midpoint  
8 of the service period to the check clearing date in steps and then added the lag days  
9 from each step to calculate the total expense lag days.<sup>24</sup> Witness Christian first  
10 calculated the service period start date to the service period end date, then divided by  
11 two for the midpoint of the service period expense lag days. Witness Christian next  
12 calculated the check date less the vendor invoice date for the payment lag days.  
13 Finally, Witness Christian calculated check clearing date less the check date for the  
14 clearing lag days.

15 **Q. Does the Company's calculation of the third-party vendor O&M expense lag days**  
16 **incorporate an error that understates the expense lag days?**

---

<sup>22</sup> The dividend yield is the same regardless of whether the return on equity is estimated using the DCF methodology (dividend yield plus growth), a long-term debt yield plus a premium using the risk premium methodology, and risk-free yield plus a risk adjusted premium under the capital asset pricing methodology, although only the DCF incorporates the dividend yield directly in the estimated return on equity.

<sup>23</sup> The AEC dividend is paid quarterly, so the service period is 45.63 days (365 divided by 4 divided by 2). The dividend is paid on average 68.8 days after the end of the quarter. The service and payment periods sum to 114.4 days. See <https://www.investors.atmosenergy.com/stock-info/dividend-history/default.aspx> for actual dividend payment dates used to calculate an average of the AEC payment lag days for the 12 most recent quarters.

<sup>24</sup> Witness Christian refers to expense lag days as "expense lead days." I use the term "expense lag days" to reflect the lag in cash payment after the service is provided or the goods are purchased. Witness Christian's calculation of the third-party vendor expense lag days from a sample of vendor invoices was provided on WP 5-1 of the electronic file Christian\_Direct\_Testimony\_Exhibit-JTC\_4 as part of the Application.

1 A. Yes. The Company erroneously excluded the days from the end of the service period  
2 to the invoice date from the calculation of the expense lag days. This error understates  
3 the third-party vendor O&M expense days and overstates the CWC included in rate  
4 base.

5 **Q. Did the Company include the days from the end of the service period to the**  
6 **invoice date in the third-party vendor O&M expense lag days in the last base rate**  
7 **proceeding?**

8 A. Yes. The error was introduced in this case. Witness Christian was the Company's  
9 CWC witness in the last base rate proceeding and the calculation of the third-party  
10 vendor O&M expense lag days included the days from the end of the service period to  
11 the invoice date in that proceeding.

12 **Q. What is your recommendation?**

13 A. I recommend the Commission correct the third-party vendor O&M expense lag days  
14 to 26.64 days from the 23.74 days as filed, an increase of 2.9 days.

15 **Q. What are the effects of your recommendation?**

16 A. The effects are a reduction of \$0.156 million in rate base and a reduction of \$0.017  
17 million in the requested base revenue increase.

18 **V. PIPELINE REPLACEMENT PROGRAM AND RIDER AND CAPITAL**  
19 **EXPENDITURE CAPS**

20 **A. Deny Request for To Include Accelerated Replacement of Aldyl-A Pipeline in The**  
21 **Pipeline Replacement Program and To Recover The Costs Through The PRP**  
22 **Rider**

23 **Q. Describe the Company's proposals to modify the PRP and to recover the**  
24 **additional costs through the PRP Rider.**

1 A. The Company proposes to modify the PRP to authorize accelerated replacement of  
2 Aldyl-A pipeline based generally on the “principles of Distribution Integrity  
3 Management” and to recover the additional costs through the PRP Rider.<sup>25</sup> The  
4 “Company has identified specific sections of Aldyl-A that should be replaced over  
5 time, and under its current proposal would anticipate the longer-term replacement of  
6 the remainder of Aldyl-A in its system over a seven-to-ten-year time period through  
7 the Company’s PRP mechanism following bare steel replacement subject to  
8 Commission approval.”<sup>26</sup>

9 **Q. Has the Company successfully executed against its original plan for the**  
10 **accelerated replacement of bare steel pipeline?**

11 A. No. The Company’s execution has been extremely poor with significant cost overruns  
12 and significant delays. This has been a continuing concern for the Commission. The  
13 Commission has expressed its frustration with the Company’s performance in  
14 numerous base and PRP rate proceeding Orders. The Commission has imposed caps  
15 on the recovery of the bare steel replacement costs recoverable through the PRP Rider  
16 to address the Company’s poor execution and to restrain the effects of the cost  
17 overruns and delays on PRP Rider rates charged to customers.

18 The Commission has repeatedly affirmed and retained the annual caps on the  
19 annual PRP capital expenditures and even extended caps to the annual non-PRP capital  
20 expenditures when the Company sought to circumvent the PRP caps by increasing its  
21 forecast non-PRP capital expenditures for recovery in base revenues. Despite no  
22 apparent attempt to remedy its poor execution, the Company has repeatedly sought to

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<sup>25</sup> Direct Testimony of Ryan Austin at 50.

<sup>26</sup> *Id.*

1 remove the PRP and non-PRP caps in nearly every PRP and base revenue proceeding  
2 since the Commission first imposed the PRP caps in Case 2017-00349.<sup>27</sup>

3 **Q. Has the Company completed its accelerated bare steel replacement program?**

4 A. No. The Company now estimates that it will not complete the accelerated bare steel  
5 replacement program until sometime after 2027. It also now claims that it does not  
6 have and cannot provide a schedule for completion or the costs to complete the bare  
7 steel replacement program.<sup>28</sup> The Company's poor execution on the bare steel  
8 replacement program still has not been remedied and is ongoing.

9 **Q. Why does the Company's poor execution on the bare steel replacement program**  
10 **matter in the consideration of its request for an accelerated Aldyl-A replacement**  
11 **program and recovery through the PRP Rider?**

12 A. The Commission's experience with the Company on the bare steel replacement should  
13 inform the Commission on the likely experience if the proposed accelerated Aldyl-A  
14 replacement program if adopted. The Company's proposed accelerated Aldyl-A  
15 replacement program would be implemented while it continues to struggle with the  
16 ongoing accelerated bare steel replacement program. The incremental costs of the  
17 accelerated Aldyl-A replacement program would further increase the costs recovered  
18 through the PRP Rider and compound the annual PRP Rider revenue increases and  
19 recoveries from customers until both programs are finally completed at some unknown  
20 future dates.

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<sup>27</sup> Refer to the Commission's Order in Case 2023-00331 at 11-19, which provides a history of the Commission's prior Orders in which it expressed concerns with the Company's cost overruns and schedule delays, the reasons it had imposed caps, and the reasons why it was necessary to retain caps.

<sup>28</sup> Response to AG 1-25. I have attached a copy of this response as Exhibit LK-9.



1 **Q. Has the Company provided a schedule or a cost estimate to completely replace**  
2 **all Aldyl-A pipeline?**

3 A. No. The Company has provided no schedule and no cost estimates to completely  
4 replace all Aldyl-A pipeline. Nor was it willing to provide a schedule and cost  
5 estimates in response to AG discovery seeking this information.<sup>29</sup> Yet, the Company  
6 seeks to have all costs that it incurs as they are incurred and for as long as they are  
7 incurred recovered through the PRP Rider, and recovered with no annual or aggregate  
8 limits to the costs that would be or could be included in the PRP Rider for this program.

9 These facts are particularly important due to the Company's failure to meet the  
10 schedule or cost estimates for the accelerated bare steel replacement program. The  
11 Company's failure to successfully execute and properly manage the accelerated bare  
12 steel replacement program to meet its own estimates when the program was initiated  
13 have caused the Commission to step in on multiple occasions to address the problems  
14 and the effects on the costs incurred and included in the PRP Rider and the resulting  
15 rates.

16 **Q. Does it make sense to undertake another accelerated replacement program for**  
17 **the Aldyl-A pipeline in addition to the accelerated replacement program for bare**  
18 **steel and to impose those costs on a limited and captive customer base?**

19 A. No. It does not make sense to embark on an accelerated program to replace all of the  
20 Aldyl-A pipeline and further increase customer rates at least until after the accelerated  
21 bare steel replacement program is completed and then only after a comprehensive  
22 review before embarking on such another replacement program. Such a review would

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<sup>29</sup> Response to AG 1-26. I have attached a copy of this response as Exhibit LK-10.

1 establish the schedule and reasonable cost to complete the Aldyl-A replacement,  
2 among other parameters.

3 It certainly does not make sense to authorize Atmos to undertake an accelerated  
4 Aldyl-A replacement program without adequate regulatory controls in place to avoid  
5 a repeat of the problems that have plagued the accelerated bare steel replacement  
6 program.

7 It does make sense to replace higher priority pipeline segments based on the  
8 safety risks and leak history. This is the approach the Commission has already adopted  
9 in several PRP and base rate proceeding Orders. The Commission has allowed the  
10 Company to proceed with and recover certain Aldyl-A pipeline segment replacement  
11 costs through the PRP Rider on a project specific basis. There is every reason for the  
12 Commission to maintain this approach and every reason not to adopt the Company's  
13 request, which is open-ended, unrestrained in any reasonable manner, and certain to  
14 impose harm on customers that can be reasonably avoided.

15 **Q. Has the Commission previously denied similar requests by the Company?**

16 A. Yes. The Company made similar requests for the accelerated replacement of all Aldyl-  
17 A pipeline and for recovery of the costs through the PRP Rider in prior PRP and base  
18 revenue proceedings, including the most recently completed base revenue proceeding,  
19 Case 2021-00214. The Commission has consistently denied the Company's requests.

20 The Company again sought authorization for the accelerated replacement of  
21 all Aldyl-A pipeline and for recovery of the costs through the PRP Rider in the most  
22 recently completed PRP proceeding, Case 2023-00231. The Commission again  
23 denied the Company's request in that proceeding, citing its prior determination  
24 denying the same request in Case 2021-00214. In its Order in Case 2023-00231, the

1 Commission reiterated its determination in Case 2021-00214, stating: “The  
2 Commission rejected Atmos’s request to expand its PRP to include the accelerated  
3 replacement of all Aldyl-A pipe and held that the inclusion of future Aldyl-A projects  
4 in the PRP would be determined on a case-by-case basis.”

5 **Q. What is your recommendation?**

6 A. I recommend the Commission reject the Company’s request for approval of an  
7 accelerated Aldyl-A replacement program and recovery of the costs through the PRP  
8 in this proceeding, just as it has repeatedly rejected the same request in prior PRP and  
9 base revenue proceedings. The Company’s request is no different in this proceeding  
10 than it was in the prior PRP and base revenue proceedings. The Commission has  
11 already made its determination and repeatedly affirmed it. The Commission’s  
12 repeated decisions and the decision specifically in Case 2023-00231 should be  
13 affirmed. “[T]he inclusion of future Aldyl-A projects in the PRP [will] be determined  
14 on a case-by-case basis.”<sup>30</sup>

15 **B. Deny Request to Remove Annual Caps on PRP and Non-PRP Capital**  
16 **Expenditures**

17 **Q. The Company requests that the Commission remove the annual caps on PRP and**  
18 **Non-PRP Capital Expenditures. Please respond.**

19 A. The Commission imposed the caps and has repeatedly affirmed the caps in numerous  
20 PRP and base revenue proceeding Orders. In the Company’s most recently completed  
21 PRP proceeding, Case 2023-00231, the Commission once again affirmed the need for  
22 and retained caps on the PRP capital expenditures, although it authorized an increase  
23 in the annual cap of \$30 million. In its Order in that proceeding, the Commission

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<sup>30</sup>Case No. 2023-00231, Final Order dated Sept. 29, 2023 at 13.

1 stated: “for the reasons discussed in previous orders, the Commission finds that  
2 Atmos’s PRP investment should continue to be subject to a cap, but that it should be  
3 raised to \$30 million.”<sup>31</sup>

4 There is no valid justification to remove the PRP and non-PRP caps. The  
5 Company has failed to demonstrate that it can properly control and manage its costs  
6 and schedules. Its PRP and non-PRP costs have been plagued by cost overruns and  
7 schedule delays; the effects on customer rates will continue until those costs are finally  
8 fully depreciated some 40 or so years into the future. The PRP and non-PRP caps  
9 provide at least some modicum of oversight and restraint by the Commission.  
10 Regardless of the caps, in each PRP proceeding, the Company has the ability to seek  
11 recovery of PRP plant costs, including plant costs due to capital expenditures in excess  
12 of the PRP caps. The PRP caps are not inviolate hard caps, but they represent  
13 thresholds above which the Company must provide justification.

14 In each base revenue proceeding, the Company has the opportunity to forecast  
15 and include non-PRP plant in service resulting from its actual and forecast capital  
16 expenditures and plant additions in the test year rate base and the related operating  
17 expenses in the revenue requirement. In its Order in Case 2018-00281, the  
18 Commission stated:

19 . . . while the Commission is not imposing a specific limit on Atmos's non-PRP  
20 capital spending in years after the forecasted test period, the Commission may  
21 prohibit a return of and on investments it finds unreasonable or unlawful.  
22 Atmos should ensure that the projects it selects to construct are consistent with  
23 its DIMP or TIMP. Moreover if its total non-PRP capital spending exceeds  
24 the 5-year rolling average, Atmos should scrutinize the justification for its  
25 projects closely and be prepared to provide supporting documentation showing  
26 how each project is consistent with its DIMP or TIMP. Significant increases in

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<sup>31</sup> Case No. 2023-00231, *Electronic Application of Atmos Energy Corporation to Establish PRP Rider Rates for the Twelve Month Period Beginning October 1, 2023* (Ky. PSC September 29, 2023), Order at 16.

1 capital spending would raise questions about the necessity of the spending and  
2 may require additional scrutiny by the Commission.<sup>32</sup>  
3

4 I note that the Commission stated that it “is not imposing a specific limit on  
5 Atmos’s non-PRP capital spending in years after the forecasted test period,” so the  
6 non-PRP cap applies specifically to the costs included in the base revenue test year.  
7 The Company may spend more than the caps after the test year, but Atmos must “be  
8 prepared” to justify the additional costs. That approach is imminently reasonable and  
9 consistent with the Company’s burden of proof regardless of the caps.

10 **Q. What is your recommendation?**

11 A. I recommend the Commission deny the Company’s requests to remove the PRP and  
12 non-PRP caps on capital expenditures. The Commission has repeatedly explained the  
13 parameters of the caps. They are not hard caps, as evidenced by the Commission’s  
14 willingness to consider costs in excess of the caps based on its review of the facts and  
15 circumstances. Nevertheless, the caps remain necessary to impose some restraint and  
16 discipline on the Company’s capital expenditures and the costs included in the PRP  
17 and base revenue requirements.

18 **VI. PROPOSED TAX RIDER**

19 **Q. Describe the Company’s proposed new Tax Rider.**

20 A. The Company seeks to establish a new Tax Rider. Company witness Brannon Taylor  
21 describes the proposed new Tax Rider as follows:<sup>33</sup>

22 The Tax Rider is designed to be utilized to capture the effects of Public Law  
23 117-169, 136 STAT. 1818 of August 16, 2022 (“Tax Act 2022”) and certain  
24 other tax related costs that will change from the amounts included in the base

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<sup>32</sup>Case No. 2018-00281, Final Order Dated May 7, 2019 at 25.

<sup>33</sup>Direct testimony of Brandon Taylor at 17.

1 revenue requirement in Case No. 2024-00276. These effects include the return  
2 on the Corporate Alternative Minimum Tax (“CAMT”) deferred tax asset  
3 (“DTA”) resulting from the Tax Act 2022, and income tax credits resulting  
4 from the Tax Act 2022 included in rate base and in the base revenue  
5 requirement in Case No. 2024- 00276.  
6

7 Witness Joel Multer also describes the proposed new Tax Rider and notes that  
8 it includes “any future changes to the federal or state income tax rates . . . and other  
9 federal, state or local tax law changes” as follows:<sup>34</sup>

10 The Tax Rider Tariff is designed to capture and implement the income tax  
11 effects of the Tax Act 2022 as well as the effects of any future changes to the  
12 federal or state income tax rate and other federal, state or local tax law changes,  
13 including but not limited to property tax rates.  
14

15 The proposed Tax Rider tariff itself provides further detail, including the  
16 proposed calculation of the return on the CAMT DTA on an estimated basis each year,  
17 followed by a true-up to the “actual effects” in the following year and a description of  
18 the calculation of the effects of federal and state income tax rate changes and property  
19 tax rate changes as the difference in the expense and revenue requirements after the  
20 rate change to the expense included in the test year included in the revenue requirement  
21 in the most recent base rate proceeding approved by the Commission.<sup>35</sup>

22 **Q. Is the proposed new Tax Rider necessary to address changes in federal and state**  
23 **income tax rates?**

24 A. No. The Commission’s responses to prior changes in the federal income and state tax  
25 rates, including the reductions pursuant to the Tax Cuts and Jobs Act (“TCJA”), did  
26 not require a Tax Rider, nor is such a tariff necessary to “capture the effects” of Tax

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<sup>34</sup> Direct Testimony of Joel Multer at 6.

<sup>35</sup> Refer to proposed Tax Rider tariff provided in Attachment 1 in response to FR 16(1)(b)(4) Sheet 43. I have attached a copy of the proposed Tax Rider tariff for ease of reference as Exhibit LK-11.

1 Act 2022 or future changes in federal and state income tax rates. In response to the  
2 TCJA, the Commission initiated generic and company-specific proceedings for the gas  
3 and electric utilities subject to its ratemaking jurisdiction. This approach has allowed  
4 the Commission to address the issues on a consistent statewide basis while allowing  
5 for differences among the utilities based on their unique facts and circumstances. In  
6 addition, there often are changes in the federal and state income tax code that do not  
7 affect income tax rates, but do affect income tax expense, including deductions and  
8 tax credits. If and when there are changes in the federal and state income tax code,  
9 whether income tax rates or other changes, then the Commission's historic approach  
10 is sufficient, and indeed, superior, to the Company's proposed new Tax Rider

11 **Q. How does the proposed Tax Rider address the amortization and refund of excess**  
12 **DTLs and the amortization and recovery of deficient DTAs if there is a change in**  
13 **the federal and/or state income tax rates?**

14 A. The paragraph 4(d) of the proposed Tax Rider tariff simply states: "These amounts  
15 shall be refunded or collected from customers based upon IRC rules and regulations if  
16 applicable."

17 **Q. Is that a problem?**

18 A. Yes. The Company's proposed Tax Rider would have the Commission preemptively  
19 delegate the specifics of the recovery or refunds of these DTAs or DTLs to the  
20 Company and essentially preemptively approve whatever the Company proposes in a  
21 future Tax Rider proceeding. That is a problem. Historically, there have been  
22 significant disagreements among the utility and other parties as to the deficient DTAs  
23 that should be recovered from and the excess DTLs that should be refunded to  
24 customers and the amounts of these recoveries or refunds, whether certain DTAs and

1 DTLs are protected or unprotected, the amortization and recovery or refund period for  
2 the deficient DTAs or excess DTLs, and the allocation of the recoveries or refunds to  
3 customer classes and the recovery or refund from customers within each class.

4 **Q. Is the proposed new Tax Rider necessary to address changes in property tax**  
5 **rates?**

6 A. No. First, this aspect of the proposed Tax Rider is problematic as a practical matter.  
7 There is no defined or quantified “property tax rate” relied on by the Company in this  
8 proceeding. This is evident from the Company’s calculation of the property tax  
9 expense in this proceeding, as detailed in the direct testimony of AG witness Randy  
10 Futral. There are numerous jurisdictions that impose property taxes and the final  
11 property tax expense is not based on some mechanical calculation, but rather is based  
12 on multiple methods, subject to negotiation, and subject to litigation. This process  
13 cannot be reduced to a simple, yet undefined, change in property tax rates.

14 Second, the Company is and should remain at risk for both increases and  
15 decreases in property tax expense compared to the property tax expense allowed in the  
16 test year. That includes the actual expense incurred in the test year and actual expense  
17 incurred after the test year. The Company is allowed to recover its forecast property  
18 tax expense in a base revenue proceeding along with its other forecast expenses and  
19 costs. The Company then must manage its costs. If the Company is “made whole”  
20 for all changes in property tax expense, however, that may be quantified, then it no  
21 longer will have the appropriate financial incentives to negotiate with the numerous  
22 jurisdictions that impose property taxes, and, just as important, the taxing jurisdictions  
23 will be provided an indirect, but nevertheless, very real, incentive to extract higher  
24 taxes from the Company.



1 **Q. If adopted, should the Tax Rider include a return on a CAMT DTA?**

2 A. No. Fundamentally, the Kentucky division is not a taxpayer or a separate legal entity  
3 and it never will be subject to the CAMT on a standalone basis. The Kentucky division  
4 is not an “applicable corporation” subject to the CAMT. Only AEC consolidated and  
5 AEHI as separate legal entities are applicable corporations subject to the CAMT.  
6 Whether AEC and AEHI are applicable corporations is determined based on whether  
7 the AEC consolidated Adjusted Financial Statement Income (“AFSI”) exceeds a  
8 statutory threshold, presently set at \$1 billion on average over the prior three tax years.

9 AEHI is an applicable corporation if AEC consolidated exceeds the \$1 billion  
10 AFSI threshold. However, the Kentucky division AFSI is not a separate legal entity  
11 or an applicable corporation; the Kentucky division is simply a ratemaking construct  
12 with AFSI that is a fraction of the AEC consolidated AFSI. The AEC consolidated  
13 AFSI includes the AEHI unregulated income and deductions that comprise the AFSI  
14 calculations, none of which are included in utility ratemaking, and certainly are not  
15 included in Kentucky ratemaking. The AEC consolidated AFSI also includes below  
16 the line gains and losses, such as gains on the sale of affiliates and/or other business  
17 restructurings, none which are included in utility ratemaking, and certainly are not  
18 included in Kentucky ratemaking.

19 Paragraph 3 of the proposed Tax Rider includes a description of the calculation  
20 of the Kentucky division CAMT and CAMT DTA on a standalone basis if AEC  
21 consolidated has a CAMT and CAMT DTA, expressly recognizing the AEC  
22 consolidated income threshold as the trigger for the CAMT. Again, the Kentucky  
23 division is and never will be subject to the CAMT on a standalone basis. This entire

1 exercise and the cost to customers is based on a ratemaking construct, not an actual  
2 CAMT incurred by the Kentucky division.

3 **Q. Is the CAMT DTA subject to the IRS “normalization rules”?**

4 A. No. The IRS normalization rules apply only to the NOL DTA caused by tax  
5 depreciation in excess of book depreciation. In other words, there is no requirement  
6 to include any CAMT DTA in rate base for ratemaking purposes.

7 **Q. Did the Commission already reject the Company’s proposal for a similar new**  
8 **Tax Act Adjustment Factor (“TAAF”) tariff in Case 2021-00214?**

9 A. Yes. The proposed TAAF tariff in Case 2021-00214 was similar to the Company’s  
10 request for the proposed new Tax Rider in this proceeding, although the proposed Tax  
11 Rider in this proceeding includes additional provisions to increase rates for changes in  
12 property tax rates and to include a return on a CAMT DTA.

13 The Commission rejected the proposed TAAF tariff in the prior proceeding,  
14 stating in its Order: “As the Attorney General argued, there are already multiple processes  
15 in place at the Commission’s and Atmos Kentucky’s disposal to address changes in the  
16 federal and state tax codes. Therefore, the Commission finds that the proposed Tax Act  
17 Adjustment Factor Rider is unreasonable and should not be approved.”<sup>36</sup>

18 **Q. What is your recommendation?**

19 A. I recommend that the Commission reject the Company’s request for a new Tax Rider.  
20 It is not necessary for changes in federal and state income tax rates. As the  
21 Commission noted in its Order in Case 2021-00214, the Commission already has the  
22 capability to address changes in the federal and state tax codes, including changes in

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<sup>36</sup>Case No. 2021-00214, Final Order Dated May 19, 2022 at 64.

1 income tax rates. The existing base ratemaking paradigm already provides the  
2 Company recovery of its reasonable costs to comply with changes in income tax rates  
3 and provides financial incentives for the Company to minimize the costs to comply  
4 with any such changes in a safe and efficient manner.

5 It is inappropriate and impractical to adopt a new Tax Rider to recover  
6 increases in property tax expense due to changes in property tax rates. The existing  
7 ratemaking paradigm already provides the Company recovery of its reasonable  
8 property tax expense and incorporates the appropriate incentives for the Company to  
9 minimize its property tax expense. The proposed new Tax Rider will remove these  
10 incentives and create new incentives for the taxing jurisdictions to impose greater costs  
11 on the Company and its customers. Further, the Company's proposal is impractical  
12 and inconsistent with the manner in which the Company's property tax expense is  
13 actually incurred.

14 Finally, the CAMT and CAMT DTA do not apply to the Kentucky division on  
15 a standalone basis. The Company's proposal is solely a ratemaking construct that will  
16 allow the Company to impose a cost on Kentucky customers that is incurred by AEC  
17 consolidated due to its unregulated activities. It has nothing to do with the regulated  
18 AEC utility divisions, let alone the Kentucky division on a standalone basis. Nor is  
19 the Commission required to include a CAMT DTA in rate base to comply with the  
20 IRS normalization rules.

## 21 **VII. PROPOSED PIPELINE MODERNIZATION RIDER**

22 **Q. Describe the Company's proposed new PM Rider.**

1 A. The Company seeks authorization to establish a new PM Rider. The proposed new  
2 PM Rider will allow the Company to recover the capital related costs for transmission  
3 assets not included in base rates or PRP rates, including costs to comply with the  
4 PMHSA Mega Rule requirements.<sup>37</sup> These costs include a grossed-up return on gross  
5 plant less accumulated depreciation less accumulated deferred income taxes and the  
6 related depreciation and ad valorem tax expenses, offset by savings in O&M expenses,  
7 if any. The proposed PM Rider is described generally by Witness Taylor and more  
8 specifically, by Witness Ryan Austin (PMHSA Mega Rule requirements), and Witness  
9 Christian (regulatory policy and the PM Rider specifically).

10 **Q. Is the proposed PM Rider in addition to the present PRP Rider and base revenue**  
11 **recovery?**

12 A. Yes. The proposed PM Rider is at its essence a form of supplemental revenue recovery  
13 for capital costs incurred after the end of the test year in a base rate proceeding. If  
14 adopted, it will result in higher rates to customers. If adopted, the PM Rider will allow  
15 the Company to incur additional capital expenditures and recover additional capital-  
16 related costs without the caps the Commission has imposed on the PRP and the  
17 recovery of PRP costs through the PRP Rider and on non-PRP costs through base  
18 revenues. If adopted, the PM Rider will provide an incentive for the Company to incur  
19 additional capital costs than it would without the PM Rider. If adopted, the PM Rider

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<sup>37</sup> Application at 7, par. 21. The Application broadly describes the proposed PM Rider “to enable the Company to implement and respond to governmental directives/mandates impacting Atmos Energy, including changes in regulations promulgated by the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (“PHMSA”); specifically, the new “Mega Rule.” Company witness testimony suggest the request at this time is more limited, i.e. the costs to comply with the Mega Rule. The proposed PM Rider tariff itself appears to limit the request to the costs to comply with the Mega Rule. Witness Christian suggests that the Company may seek to expand the use of the PM Rider in the future for additional compliance costs.

1 will provide an expedited form of ratemaking recovery compared to the existing  
2 recovery through the PRP rider and base revenues.

3 **Q. Is there another concern with the proposed PM Rider in conjunction with the**  
4 **existing PRP Rider?**

5 A. Yes. There is no brightline for costs that will be recoverable through the PM Rider  
6 compared to costs recoverable through the PRP Rider, except that there will be no  
7 double recovery of the same costs through the two riders. To illustrate this point, the  
8 replacement of bare steel pipeline and Aldyl-A pipeline broadly is required by the  
9 PMHSA and the Mega Rule, but the Mega Rule does not require an accelerated and  
10 systematic replacement of either type of pipeline as is presently authorized by the  
11 Commission for bare steel pipeline, but which has been rejected by the Commission  
12 for Aldyl-A pipeline. Yet, the Company argues broadly in this proceeding that it is or  
13 will be required ultimately to replace all Aldyl-A pipeline and thus, requests approval  
14 for an accelerated and systematic replacement of all Aldyl-A pipeline and recovery of  
15 the costs through the PRP Rider. If the Commission denies those PRP and PRP Rider  
16 requests, but approves the PM Rider, then it is highly likely the Company will pursue  
17 the accelerated and systematic replacement of all Aldyl-A pipeline and recover the  
18 costs through the PM Rider.

19 This concern is not unfounded. When the Commission first set caps on the  
20 annual PRP capital expenditures, the Company modified its approach and simply  
21 included the same costs as non-PRP capital expenditures in rate base in its then  
22 pending base rate proceeding. The Commission then was forced to address this  
23 subterfuge and preemptively deny recovery of the costs in the base revenue  
24 requirement, thereby ensuring the Company would not incur them.

1 **Q. Are there yet other concerns with the PM Rider?**

2 A. Yes. The scope of the compliance projects, timing of the compliance projects, and  
3 the costs incurred to comply with the Mega Rule are largely subject to definition by  
4 the Company and the judgment of the Company, but perhaps the larger concern is the  
5 lack of definition and, more broadly, the inability to narrowly define the compliance  
6 requirements of the Mega Rule for purposes of the proposed PM Rider.

7 This is not a problem for the PRP Rider because it is limited to the replacement  
8 of bare steel pipeline and specific segments of Aldyl-A pipeline. This is not a problem  
9 for base revenues because presently those costs include everything that is not  
10 recovered through the PRP Rider. As I previously noted, the Company remains at risk  
11 for the costs recovered through base revenues. But it is a problem for the proposed  
12 PM Rider given that, if adopted, the Company may, and likely will, aggressively  
13 define much, if not most, of its non-PRP capital expenditures as necessary to comply  
14 with the requirements of the Mega Rule. This will put the Commission in the untenable  
15 position of navigating through the requirements of the Mega Rule and making the  
16 determinations as to whether the costs are, in fact, necessary for compliance with the  
17 Mega Rule and then recoverable through the PM Rider. The presumption likely will  
18 be in favor of the Company's assertions. The better approach is to avoid this  
19 conundrum altogether.

20 Another concern is the Company's inability or unwillingness to provide an  
21 estimate of the costs and the schedule necessary to comply with the Mega Rule  
22 requirements in response to AG discovery.<sup>38</sup> Such an inability or unwillingness

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<sup>38</sup> Response to AG 1-21. I have attached a copy of this response as Exhibit LK-12.

1 precludes any assessment by the Commission in this proceeding of the potential scope  
2 of work, the schedule for the work, or the cost to comply with the Mega Rule  
3 requirements or to hold the Company accountable for its execution and the costs that  
4 would be recovered through the PM Rider.

5 **Q. In the absence of the PM Rider to date, has the Company failed to comply with**  
6 **any of the Mega Rule requirements?**

7 A. No. The Company confirmed that it had complied with all Mega Rule requirements  
8 to date and had done so in the absence of a rider in response to AG discovery.<sup>39</sup>

9 **Q. What is your recommendation?**

10 A. I recommend the Commission deny the requested PM Rider. It will significantly  
11 change the present ratemaking paradigm, incentivize the Company to incur greater  
12 capital expenditures earlier, shift the balance between the Company and other parties,  
13 and impose greater costs on customers through annual rate increases. The PM Rider  
14 is not necessary for the Company to meet the compliance requirements of the Mega  
15 Rule, as evidenced by its compliance with the Mega Rule without a rider to date.

16 **VIII. ANNUAL RATE REVIEW MECHANISM**

17 **Q. Describe the Company's proposal for an annual rate review mechanism.**

18 A. The Company's proposal is described by Witness Taylor,<sup>40</sup> although it is not included  
19 in the Company's Petition or in the table of contents to Witness Taylor's testimony.  
20 In fact, Witness Taylor asserts that the Company is not even proposing such a  
21 mechanism; however, he states that the Company would like the Commission to

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<sup>39</sup> Response to AG 1-20. I have attached a copy of this response as Exhibit LK-13.

<sup>40</sup> Direct Testimony of Brannon C. Taylor at 28.

1 “continue to consider” such a plan.<sup>41</sup> I’m not sure what the distinction is between a  
2 proposal or a request to continue to consider. Regardless of the Company’s  
3 characterization, I will refer to its request as a proposal for an annual rate review  
4 mechanism.

5 The Company did not provide a detailed description of its proposed annual rate  
6 review mechanism or a proposed tariff. Instead, Witness Taylor cited to an annual  
7 rate review mechanism approved by the Tennessee Public Utility Commission  
8 (“TPUC”), although it failed even to provide a copy of the mechanism approved by  
9 the TPUC for the Commission to “continue to consider.” Witness Taylor made the  
10 following assertions that “a regularly scheduled rate review . . . will cost less and adjust  
11 the rates each year in a more timely manner to actually achieve the result contemplated  
12 by the Commission’s rate orders. The Company envisions an annual mechanism  
13 saving all parties time, money and resources, while simultaneously promoting  
14 increased transparency and interaction between the Commission, the Company and  
15 relevant stakeholders.”<sup>42</sup>

16 **Q. Did the Commission reject the Company’s proposal for an annual review**  
17 **mechanism in a prior base rate case proceeding?**

18 A. Yes. The Commission rejected the Company’s proposal for an annual review  
19 mechanism (“ARM”) in Case 2017-00349. The Company’s proposed ARM would  
20 have replaced the PRP in that proceeding, a component of that prior proposal that is  
21 not addressed in the Company’s generalized proposal in this proceeding. In its Order  
22 in Case 2017-00349, the Commission stated:

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<sup>41</sup> *Id.*

<sup>42</sup> *Id.*



1 The Commission finds that the current ratemaking process is aligned with  
2 Kentucky statutes and regulations, ensures the public interest is served, and  
3 that it is fair to Atmos and its shareholders. The proposed ARM, while it may  
4 meet the needs of commissions in other jurisdictions, is not attractive in its  
5 offer of expediency or its relative guarantee of return. The Commission shares  
6 some of the concerns of the Attorney General with regard to lack of clear  
7 benefit to customers beyond that of a decrease in regulatory expense, and a  
8 predictable and possibly gradual annual increase in rates, the possibility of rate  
9 decreases notwithstanding. Moreover, to approve an annual ratemaking  
10 mechanism that could subsequently, and perhaps inevitably, be requested by  
11 and approved for 42 other gas and electric utilities and dozens of regulated  
12 water and sewer utilities, does not appear to provide benefits to the  
13 Commission, Commission Staff, intervenors, or consumers in terms of using  
14 scarce resources to produce reasonable outcomes. The Commission, therefore,  
15 finds that the proposed ARM tariff and mechanism should be denied.<sup>43</sup>  
16

17 **Q. Did Witness Taylor provide any support for his assertions as to the alleged**  
18 **benefits of the proposed annual review mechanism?**

19 A. No. The Company's proposal suffers from the same infirmities and invalid arguments  
20 in this proceeding that it made and that were addressed by the AG in its opposition to  
21 the ARM proposed in Case 2017-00349. The Commission recited the AG's arguments  
22 in its Order in Case 2017-00349 as follows:

23 The Attorney General recommends that the ARM be rejected because 1) it is  
24 not necessary to achieve annual or more frequent rate increases; 2) it is not  
25 necessary to eliminate regulatory lag due to Atmos's ability to use a forecasted  
26 test year; 3) it will harm customers by forcing the incurrence of more frequent  
27 and larger increases without the traditional rate case process review; 4) there  
28 is no support for Atmos's claim that the ARM will result in savings due to  
29 reduction in ratemaking cost, and; 5) the ARM removes the utility's incentive  
30 to exercise management control to maintain its authorized return between rate  
31 cases.<sup>44</sup>  
32

33 Those same arguments by the AG in opposition to the Company's proposal  
34 continue to apply in this proceeding.

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<sup>43</sup> Case No. 2017-00349, Final Order dated May 3, 2018 at 36-37.

<sup>44</sup> *Id.* at 35.

1 **Q. What is your recommendation?**

2 A. I recommend that the Commission reject the Company's proposed annual rate review  
3 mechanism. It isn't even an actual request, according to Witness Taylor, and has  
4 already been rejected by the Commission in Case 2017-00349.

5 **IX. TERMINATE RECOVERY OF DISCRETIONARY GTI GRANT FUNDING**  
6 **AND R&D RIDER**

7  
8 **Q. Describe the Company's grant funding to GTI and the recovery of these funding**  
9 **amounts through the R&D Rider.**

10 A. The Company presently recovers slightly less than \$300,000 annually through the  
11 R&D Rider and remits these amounts in the form of grant funding to support the  
12 research activities of the GTI. The Company funds research projects in the Operations  
13 Technology Development (OTD) research and development and the Utilization  
14 Technology Development (UTD) programs of the GTI. The Company collected  
15 \$0.259 million from customers and funded \$0.264 million in calendar year 2023.<sup>45</sup>

16 In response to Staff discovery, the Company states that: "Services provided to  
17 the Company by GTI include program and project management, R&D work from  
18 applied research, to field experiments, to field tests, to demonstration projects. GTI  
19 also works with manufacturers and others to get the results of the R&D into the  
20 marketplace so that they can be used by gas companies and gas consumers."<sup>46</sup>

21 In response to Staff discovery, the Company asserts that "OTD projects have  
22 and will result in increased gas system safety, deliverability, integrity and O&M cost

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<sup>45</sup> Response to Staff 1-08(a).

<sup>46</sup> Response to Staff 1-08(b).

1 containment” and that “UTD projects have and will result in gas consumer energy  
2 savings, reduced gas bills, reduced gas use, environmental benefits, and enhance  
3 safety.”<sup>47</sup>

4 **Q. Is it appropriate to continue to collect these discretionary funding amounts from**  
5 **customers through the R&D Rider?**

6 A. No. These are activities that should be funded directly by the suppliers to the industry  
7 and manufacturers of industry and end-use customer equipment and appliances, both  
8 for competitive advantage and through their industry research organizations for safety  
9 and other reasons. It is not necessary for the Company’s customers to fund these  
10 research and development activities. There is no evidence there are direct benefits to  
11 the Company’s customers other than the generalized benefits described by the  
12 Company resulting from its grant funding of certain OTD and UTD programs. In  
13 addition, grant funding by the various Atmos divisions varies widely. In contrast to  
14 the Atmos Kentucky division, the Atmos West Texas division funded \$0.062 million  
15 in the twelve months ending June 30, 2024, based on a discovery response in a base  
16 rate case pending before the Railroad Commission of Texas.

17 **Q. What is your recommendation?**

18 A. I recommend the Commission terminate the recovery of the discretionary grants the  
19 Company makes to GTI and terminate the R&D Rider.

20 **Q. Does this complete your testimony?**

21 A. Yes.

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<sup>47</sup> *Id.*

**AFFIDAVIT**

STATE OF GEORGIA )

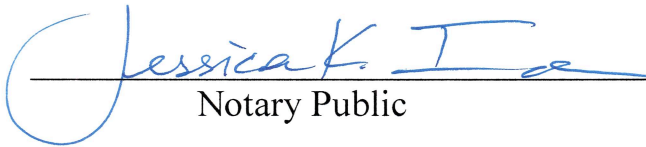
COUNTY OF FULTON )

LANE KOLLEN, being duly sworn, deposes and states: that the attached is his sworn testimony and that the statements contained are true and correct to the best of his knowledge, information and belief.



Lane Kollen

Sworn to and subscribed before me on this  
27th day of January 2025.



Notary Public

Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027

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

**In the Matter of:**

**ELECTRONIC APPLICATION OF )**  
**ATMOS ENERGY CORPORATION )**  
**FOR AN ADJUSTMENT OF RATES; ) Case No. 2024-00276**  
**APPROVAL OF TARIFF REVISIONS; )**  
**AND OTHER GENERAL RELIEF )**

**EXHIBITS**  
**OF**  
**LANE KOLLEN**

**ON BEHALF OF**  
**THE OFFICE OF THE ATTORNEY GENERAL**

**J. Kennedy and Associates, Inc.**  
**570 Colonial Park Drive, Suite 305**  
**Roswell, GA 30075**

**JANUARY 2025**

**EXHIBIT LK-1**

## **RESUME OF LANE KOLLEN, PRESIDENT**

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### **EDUCATION**

**University of Toledo, BBA**  
Accounting

**University of Toledo, MBA**

**Luther Rice University, MA**

### **PROFESSIONAL CERTIFICATIONS**

**Certified Public Accountant (CPA)**

**Certified Management Accountant (CMA)**

**Chartered Global Management Accountant (CGMA)**

### **PROFESSIONAL AFFILIATIONS**

**American Institute of Certified Public Accountants**

**Georgia Society of Certified Public Accountants**

**Institute of Management Accountants**

**Society of Depreciation Professionals**

Mr. Kollen has more than forty years of utility industry experience in the financial, rate, tax, and planning areas. He specializes in revenue requirements analyses, taxes, evaluation of rate and financial impacts of traditional and nontraditional ratemaking, utility mergers/acquisition and diversification. Mr. Kollen has expertise in proprietary and nonproprietary software systems used by utilities for budgeting, rate case support and strategic and financial planning.

## RESUME OF LANE KOLLEN, PRESIDENT

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### EXPERIENCE

**1986 to  
Present:**

**J. Kennedy and Associates, Inc.:** Vice President and Principal. Responsible for utility stranded cost analysis, revenue requirements analysis, cash flow projections and solvency, financial and cash effects of traditional and nontraditional ratemaking, and research, speaking and writing on the effects of tax law changes. Testimony before Connecticut, Florida, Georgia, Indiana, Louisiana, Kentucky, Maine, Maryland, Minnesota, New York, North Carolina, Ohio, Pennsylvania, Tennessee, Texas, West Virginia and Wisconsin state regulatory commissions and the Federal Energy Regulatory Commission.

**1983 to  
1986:**

**Energy Management Associates:** Lead Consultant.  
Consulting in the areas of strategic and financial planning, traditional and nontraditional ratemaking, rate case support and testimony, diversification and generation expansion planning. Directed consulting and software development projects utilizing PROSCREEN II and ACUMEN proprietary software products. Utilized ACUMEN detailed corporate simulation system, PROSCREEN II strategic planning system and other custom developed software to support utility rate case filings including test year revenue requirements, rate base, operating income and pro-forma adjustments. Also utilized these software products for revenue simulation, budget preparation and cost-of-service analyses.

**1976 to  
1983:**

**The Toledo Edison Company:** Planning Supervisor.  
Responsible for financial planning activities including generation expansion planning, capital and expense budgeting, evaluation of tax law changes, rate case strategy and support and computerized financial modeling using proprietary and nonproprietary software products. Directed the modeling and evaluation of planning alternatives including:

Rate phase-ins.  
Construction project cancellations and write-offs.  
Construction project delays.  
Capacity swaps.  
Financing alternatives.  
Competitive pricing for off-system sales.  
Sale/leasebacks.



## RESUME OF LANE KOLLEN, PRESIDENT

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### CLIENTS SERVED

#### Industrial Companies and Groups

Air Products and Chemicals, Inc.	Lehigh Valley Power Committee
Airco Industrial Gases	Maryland Industrial Group
Alcan Aluminum	Multiple Intervenors (New York)
Armco Advanced Materials Co.	National Southwire
Armco Steel	North Carolina Industrial
Bethlehem Steel	Energy Consumers
CF&I Steel, L.P.	Occidental Chemical Corporation
Climax Molybdenum Company	Ohio Energy Group
Connecticut Industrial Energy Consumers	Ohio Industrial Energy Consumers
ELCON	Ohio Manufacturers Association
Enron Gas Pipeline Company	Philadelphia Area Industrial Energy
Florida Industrial Power Users Group	Users Group
Gallatin Steel	PSI Industrial Group
General Electric Company	Smith Cogeneration
GPU Industrial Intervenors	Taconite Intervenors (Minnesota)
Indiana Industrial Group	West Penn Power Industrial Intervenors
Industrial Consumers for	West Virginia Energy Users Group
Fair Utility Rates - Indiana	Westvaco Corporation
Industrial Energy Consumers - Ohio	
Kentucky Industrial Utility Customers, Inc.	
Kimberly-Clark Company	

#### Regulatory Commissions and Government Agencies

Cities in Texas-New Mexico Power Company's Service Territory  
Cities in AEP Texas Central Company's Service Territory  
Cities in AEP Texas North Company's Service Territory  
City of Austin  
Georgia Public Service Commission Staff  
Florida Office of Public Counsel  
Indiana Office of Utility Consumer Counsel  
Kentucky Office of Attorney General  
Louisiana Public Service Commission  
Louisiana Public Service Commission Staff  
Maine Office of Public Advocate  
New York City  
New York State Energy Office  
South Carolina Office of Regulatory Staff  
Texas Office of Public Utility Counsel  
Utah Office of Consumer Services

**RESUME OF LANE KOLLEN, PRESIDENT**

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**Utilities**

Allegheny Power System  
Atlantic City Electric Company  
Carolina Power & Light Company  
Cleveland Electric Illuminating Company  
Delmarva Power & Light Company  
Duquesne Light Company  
General Public Utilities  
Georgia Power Company  
Middle South Services  
Nevada Power Company  
Niagara Mohawk Power Corporation

Otter Tail Power Company  
Pacific Gas & Electric Company  
Public Service Electric & Gas  
Public Service of Oklahoma  
Rochester Gas and Electric  
Savannah Electric & Power Company  
Seminole Electric Cooperative  
Southern California Edison  
Talquin Electric Cooperative  
Tampa Electric  
Texas Utilities  
Toledo Edison Company

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdct.	Party	Utility	Subject
10/86	U-17282 Interim	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements financial solvency.
11/86	U-17282 Interim Rebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements financial solvency.
12/86	9613	KY	Attorney General Div. of Consumer Protection	Big Rivers Electric Corp.	Revenue requirements accounting adjustments financial workout plan.
1/87	U-17282 Interim	LA 19th Judicial District Ct.	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements, financial solvency.
3/87	General Order 236	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Tax Reform Act of 1986.
4/87	U-17282 Prudence	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Prudence of River Bend 1, economic analyses, cancellation studies.
4/87	M-100 Sub 113	NC	North Carolina Industrial Energy Consumers	Duke Power Co.	Tax Reform Act of 1986.
5/87	86-524-E-SC	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Revenue requirements, Tax Reform Act of 1986.
5/87	U-17282 Case In Chief	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, financial solvency.
7/87	U-17282 Case In Chief Surrebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, financial solvency.
7/87	U-17282 Prudence Surrebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Prudence of River Bend 1, economic analyses, cancellation studies.
7/87	86-524 E-SC Surrebuttal	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Revenue requirements, Tax Reform Act of 1986.
8/87	9885	KY	Attorney General Div. of Consumer Protection	Big Rivers Electric Corp.	Financial workout plan.
8/87	E-015/GR-87-223	MN	Taconite Intervenors	Minnesota Power & Light Co.	Revenue requirements, O&M expense, Tax Reform Act of 1986.
10/87	870220-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue requirements, O&M expense, Tax Reform Act of 1986.
11/87	87-07-01	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Tax Reform Act of 1986.
1/88	U-17282	LA 19th Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, rate of return.
2/88	9934	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Economics of Trimble County, completion.
2/88	10064	KY	Kentucky Industrial Utility	Louisville Gas &	Revenue requirements, O&M expense, capital

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
			Customers	Electric Co.	structure, excess deferred income taxes.
5/88	10217	KY	Alcan Aluminum National Southwire	Big Rivers Electric Corp.	Financial workout plan.
5/88	M-87017-1C001	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Nonutility generator deferred cost recovery.
5/88	M-87017-2C005	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Nonutility generator deferred cost recovery.
6/88	U-17282	LA 19th Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Prudence of River Bend 1 economic analyses, cancellation studies, financial modeling.
7/88	M-87017-1C001 Rebuttal	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Nonutility generator deferred cost recovery, SFAS No. 92.
7/88	M-87017-2C005 Rebuttal	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Nonutility generator deferred cost recovery, SFAS No. 92.
9/88	88-05-25	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Excess deferred taxes, O&M expenses.
9/88	10064 Rehearing	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Premature retirements, interest expense.
10/88	88-170-EL-AIR	OH	Ohio Industrial Energy Consumers	Cleveland Electric Illuminating Co.	Revenue requirements, phase-in, excess deferred taxes, O&M expenses, financial considerations, working capital.
10/88	88-171-EL-AIR	OH	Ohio Industrial Energy Consumers	Toledo Edison Co.	Revenue requirements, phase-in, excess deferred taxes, O&M expenses, financial considerations, working capital.
10/88	8800-355-EI	FL	Florida Industrial Power Users' Group	Florida Power & Light Co.	Tax Reform Act of 1986, tax expenses, O&M expenses, pension expense (SFAS No. 87).
10/88	3780-U	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Co.	Pension expense (SFAS No. 87).
11/88	U-17282 Remand	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Rate base exclusion plan (SFAS No. 71).
12/88	U-17970	LA	Louisiana Public Service Commission Staff	AT&T Communications of South Central States	Pension expense (SFAS No. 87).
12/88	U-17949 Rebuttal	LA	Louisiana Public Service Commission Staff	South Central Bell	Compensated absences (SFAS No. 43), pension expense (SFAS No. 87), Part 32, income tax normalization.
2/89	U-17282 Phase II	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, phase-in of River Bend 1, recovery of canceled plant.
6/89	881602-EU 890326-EU	FL	Talquin Electric Cooperative	Talquin/City of Tallahassee	Economic analyses, incremental cost-of-service, average customer rates.

**Expert Testimony Appearances  
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Lane Kollen  
As of January 2025**

Date	Case	Jurisdct.	Party	Utility	Subject
7/89	U-17970	LA	Louisiana Public Service Commission Staff	AT&T Communications of South Central States	Pension expense (SFAS No. 87), compensated absences (SFAS No. 43), Part 32.
8/89	8555	TX	Occidental Chemical Corp.	Houston Lighting & Power Co.	Cancellation cost recovery, tax expense, revenue requirements.
8/89	3840-U	GA	Georgia Public Service Commission Staff	Georgia Power Co.	Promotional practices, advertising, economic development.
9/89	U-17282 Phase II Detailed	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, detailed investigation.
10/89	8880	TX	Enron Gas Pipeline	Texas-New Mexico Power Co.	Deferred accounting treatment, sale/leaseback.
10/89	8928	TX	Enron Gas Pipeline	Texas-New Mexico Power Co.	Revenue requirements, imputed capital structure, cash working capital.
10/89	R-891364	PA	Philadelphia Area Industrial Energy Users Group	Philadelphia Electric Co.	Revenue requirements.
11/89 12/89	R-891364 Surrebuttal (2 Filings)	PA	Philadelphia Area Industrial Energy Users Group	Philadelphia Electric Co.	Revenue requirements, sale/leaseback.
1/90	U-17282 Phase II Detailed Rebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, detailed investigation.
1/90	U-17282 Phase III	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Phase-in of River Bend 1, deregulated asset plan.
3/90	890319-EI	FL	Florida Industrial Power Users Group	Florida Power & Light Co.	O&M expenses, Tax Reform Act of 1986.
4/90	890319-EI Rebuttal	FL	Florida Industrial Power Users Group	Florida Power & Light Co.	O&M expenses, Tax Reform Act of 1986.
4/90	U-17282	LA 19 <sup>th</sup> Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Fuel clause, gain on sale of utility assets.
9/90	90-158	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Revenue requirements, post-test year additions, forecasted test year.
12/90	U-17282 Phase IV	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements.
3/91	29327, et. al.	NY	Multiple Intervenors	Niagara Mohawk Power Corp.	Incentive regulation.
5/91	9945	TX	Office of Public Utility Counsel of Texas	El Paso Electric Co.	Financial modeling, economic analyses, prudence of Palo Verde 3.

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
9/91	P-910511 P-910512	PA	Allegheny Ludlum Corp., Armco Advanced Materials Co., The West Penn Power Industrial Users' Group	West Penn Power Co.	Recovery of CAAA costs, least cost financing.
9/91	91-231-E-NC	WV	West Virginia Energy Users Group	Monongahela Power Co.	Recovery of CAAA costs, least cost financing.
11/91	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Asset impairment, deregulated asset plan, revenue requirements.
12/91	91-410-EL-AIR	OH	Air Products and Chemicals, Inc., Armco Steel Co., General Electric Co., Industrial Energy Consumers	Cincinnati Gas & Electric Co.	Revenue requirements, phase-in plan.
12/91	PUC Docket 10200	TX	Office of Public Utility Counsel of Texas	Texas-New Mexico Power Co.	Financial integrity, strategic planning, declined business affiliations.
5/92	910890-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue requirements, O&M expense, pension expense, OPEB expense, fossil dismantling, nuclear decommissioning.
8/92	R-00922314	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Incentive regulation, performance rewards, purchased power risk, OPEB expense.
9/92	92-043	KY	Kentucky Industrial Utility Consumers	Generic Proceeding	OPEB expense.
9/92	920324-EI	FL	Florida Industrial Power Users' Group	Tampa Electric Co.	OPEB expense.
9/92	39348	IN	Indiana Industrial Group	Generic Proceeding	OPEB expense.
9/92	910840-PU	FL	Florida Industrial Power Users' Group	Generic Proceeding	OPEB expense.
9/92	39314	IN	Industrial Consumers for Fair Utility Rates	Indiana Michigan Power Co.	OPEB expense.
11/92	U-19904	LA	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
11/92	8469	MD	Westvaco Corp., Eastalco Aluminum Co.	Potomac Edison Co.	OPEB expense.
11/92	92-1715-AU-COI	OH	Ohio Manufacturers Association	Generic Proceeding	OPEB expense.
12/92	R-00922378	PA	Armco Advanced Materials Co., The WPP Industrial Intervenors	West Penn Power Co.	Incentive regulation, performance rewards, purchased power risk, OPEB expense.
12/92	U-19949	LA	Louisiana Public Service Commission Staff	South Central Bell	Affiliate transactions, cost allocations, merger.

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdct.	Party	Utility	Subject
12/92	R-00922479	PA	Philadelphia Area Industrial Energy Users' Group	Philadelphia Electric Co.	OPEB expense.
1/93	8487	MD	Maryland Industrial Group	Baltimore Gas & Electric Co., Bethlehem Steel Corp.	OPEB expense, deferred fuel, CWIP in rate base.
1/93	39498	IN	PSI Industrial Group	PSI Energy, Inc.	Refunds due to over-collection of taxes on Marble Hill cancellation.
3/93	92-11-11	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co	OPEB expense.
3/93	U-19904 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
3/93	93-01-EL-EFC	OH	Ohio Industrial Energy Consumers	Ohio Power Co.	Affiliate transactions, fuel.
3/93	EC92-21000 ER92-806-000	FERC	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
4/93	92-1464-EL-AIR	OH	Air Products Armco Steel Industrial Energy Consumers	Cincinnati Gas & Electric Co.	Revenue requirements, phase-in plan.
4/93	EC92-21000 ER92-806-000 (Rebuttal)	FERC	Louisiana Public Service Commission	Gulf States Utilities /Entergy Corp.	Merger.
9/93	93-113	KY	Kentucky Industrial Utility Customers	Kentucky Utilities	Fuel clause and coal contract refund.
9/93	92-490, 92-490A, 90-360-C	KY	Kentucky Industrial Utility Customers and Kentucky Attorney General	Big Rivers Electric Corp.	Disallowances and restitution for excessive fuel costs, illegal and improper payments, recovery of mine closure costs.
10/93	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	Revenue requirements, debt restructuring agreement, River Bend cost recovery.
1/94	U-20647	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Audit and investigation into fuel clause costs.
4/94	U-20647 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear and fossil unit performance, fuel costs, fuel clause principles and guidelines.
4/94	U-20647 (Supplemental Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Audit and investigation into fuel clause costs.
5/94	U-20178	LA	Louisiana Public Service Commission Staff	Louisiana Power & Light Co.	Planning and quantification issues of least cost integrated resource plan.
9/94	U-19904 Initial Post-Merger Earnings Review	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	River Bend phase-in plan, deregulated asset plan, capital structure, other revenue requirement issues.

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
9/94	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policies, exclusion of River Bend, other revenue requirement issues.
10/94	3905-U	GA	Georgia Public Service Commission Staff	Southern Bell Telephone Co.	Incentive rate plan, earnings review.
10/94	5258-U	GA	Georgia Public Service Commission Staff	Southern Bell Telephone Co.	Alternative regulation, cost allocation.
11/94	U-19904 Initial Post-Merger Earnings Review (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	River Bend phase-in plan, deregulated asset plan, capital structure, other revenue requirement issues.
11/94	U-17735 (Rebuttal)	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policy, exclusion of River Bend, other revenue requirement issues.
4/95	R-00943271	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Revenue requirements. Fossil dismantling, nuclear decommissioning.
6/95	3905-U Rebuttal	GA	Georgia Public Service Commission	Southern Bell Telephone Co.	Incentive regulation, affiliate transactions, revenue requirements, rate refund.
6/95	U-19904 (Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Gas, coal, nuclear fuel costs, contract prudence, base/fuel realignment.
10/95	95-02614	TN	Tennessee Office of the Attorney General Consumer Advocate	BellSouth Telecommunications, Inc.	Affiliate transactions.
10/95	U-21485 (Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear O&M, River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues.
11/95	U-19904 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co. Division	Gas, coal, nuclear fuel costs, contract prudence, base/fuel realignment.
11/95	U-21485 (Supplemental Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear O&M, River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues.
12/95	U-21485 (Surrebuttal)				
12/95	95-299-EL-AIR 95-300-EL-AIR	OH	Industrial Energy Consumers	The Toledo Edison Co., The Cleveland Electric Illuminating Co.	Competition, asset write-offs and revaluation, O&M expense, other revenue requirement issues.
2/96	PUC Docket 14965	TX	Office of Public Utility Counsel	Central Power & Light	Nuclear decommissioning.
5/96	95-485-LCS	NM	City of Las Cruces	El Paso Electric Co.	Stranded cost recovery, municipalization.
7/96	8725	MD	The Maryland Industrial Group and Redland Genstar, Inc.	Baltimore Gas & Electric Co., Potomac Electric Power Co., and Constellation Energy Corp.	Merger savings, tracking mechanism, earnings sharing plan, revenue requirement issues.



**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
9/96 11/96	U-22092 U-22092 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues, allocation of regulated/nonregulated costs.
10/96	96-327	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Environmental surcharge recoverable costs.
2/97	R-00973877	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Stranded cost recovery, regulatory assets and liabilities, intangible transition charge, revenue requirements.
3/97	96-489	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	Environmental surcharge recoverable costs, system agreements, allowance inventory, jurisdictional allocation.
6/97	TO-97-397	MO	MCI Telecommunications Corp., Inc., MCImetro Access Transmission Services, Inc.	Southwestern Bell Telephone Co.	Price cap regulation, revenue requirements, rate of return.
6/97	R-00973953	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
7/97	R-00973954	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
7/97	U-22092	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Depreciation rates and methodologies, River Bend phase-in plan.
8/97	97-300	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co., Kentucky Utilities Co.	Merger policy, cost savings, surcredit sharing mechanism, revenue requirements, rate of return.
8/97	R-00973954 (Surrebuttal)	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
10/97	97-204	KY	Alcan Aluminum Corp. Southwire Co.	Big Rivers Electric Corp.	Restructuring, revenue requirements, reasonableness.
10/97	R-974008	PA	Metropolitan Edison Industrial Users Group	Metropolitan Edison Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements.
10/97	R-974009	PA	Penelec Industrial Customer Alliance	Pennsylvania Electric Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements.
11/97	97-204 (Rebuttal)	KY	Alcan Aluminum Corp. Southwire Co.	Big Rivers Electric Corp.	Restructuring, revenue requirements, reasonableness of rates, cost allocation.
11/97	U-22491	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
11/97	R-00973953 (Surrebuttal)	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
11/97	R-973981	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, fossil decommissioning, revenue requirements, securitization.
11/97	R-974104	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements, securitization.
12/97	R-973981 (Surrebuttal)	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, fossil decommissioning, revenue requirements.
12/97	R-974104 (Surrebuttal)	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements, securitization.
1/98	U-22491 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.
2/98	8774	MD	Westvaco	Potomac Edison Co.	Merger of Duquesne, AE, customer safeguards, savings sharing.
3/98	U-22092 (Allocated Stranded Cost Issues)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Restructuring, stranded costs, regulatory assets, securitization, regulatory mitigation.
3/98	8390-U	GA	Georgia Natural Gas Group, Georgia Textile Manufacturers Assoc.	Atlanta Gas Light Co.	Restructuring, unbundling, stranded costs, incentive regulation, revenue requirements.
3/98	U-22092 (Allocated Stranded Cost Issues) (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Restructuring, stranded costs, regulatory assets, securitization, regulatory mitigation.
3/98	U-22491 (Supplemental Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.
10/98	97-596	ME	Maine Office of the Public Advocate	Bangor Hydro-Electric Co.	Restructuring, unbundling, stranded costs, T&D revenue requirements.
10/98	9355-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Co.	Affiliate transactions.
10/98	U-17735 Rebuttal	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policy, other revenue requirement issues.

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Date	Case	Jurisdic.	Party	Utility	Subject
11/98	U-23327	LA	Louisiana Public Service Commission Staff	SWEPCO, CSW and AEP	Merger policy, savings sharing mechanism, affiliate transaction conditions.
12/98	U-23358 (Direct)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
12/98	98-577	ME	Maine Office of Public Advocate	Maine Public Service Co.	Restructuring, unbundling, stranded cost, T&D revenue requirements.
1/99	98-10-07	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Stranded costs, investment tax credits, accumulated deferred income taxes, excess deferred income taxes.
3/99	U-23358 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
3/99	98-474	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements, alternative forms of regulation.
3/99	98-426	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements, alternative forms of regulation.
3/99	99-082	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
3/99	99-083	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
4/99	U-23358 (Supplemental Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
4/99	99-03-04	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Regulatory assets and liabilities, stranded costs, recovery mechanisms.
4/99	99-02-05	CT	Connecticut Industrial Utility Customers	Connecticut Light and Power Co.	Regulatory assets and liabilities, stranded costs, recovery mechanisms.
5/99	98-426 99-082 (Additional Direct)	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
5/99	98-474 99-083 (Additional Direct)	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
5/99	98-426 98-474 (Response to Amended Applications)	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co., Kentucky Utilities Co.	Alternative regulation.
6/99	97-596	ME	Maine Office of Public Advocate	Bangor Hydro-Electric Co.	Request for accounting order regarding electric industry restructuring costs.
7/99	U-23358	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Affiliate transactions, cost allocations.

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Date	Case	Jurisdict.	Party	Utility	Subject
7/99	99-03-35	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Stranded costs, regulatory assets, tax effects of asset divestiture.
7/99	U-23327	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co., Central and South West Corp, American Electric Power Co.	Merger Settlement and Stipulation.
7/99	97-596 Surrebuttal	ME	Maine Office of Public Advocate	Bangor Hydro-Electric Co.	Restructuring, unbundling, stranded cost, T&D revenue requirements.
7/99	98-0452-E-GI	WV	West Virginia Energy Users Group	Monongahela Power, Potomac Edison, Appalachian Power, Wheeling Power	Regulatory assets and liabilities.
8/99	98-577 Surrebuttal	ME	Maine Office of Public Advocate	Maine Public Service Co.	Restructuring, unbundling, stranded costs, T&D revenue requirements.
8/99	98-426 99-082 Rebuttal	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
8/99	98-474 98-083 Rebuttal	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
8/99	98-0452-E-GI Rebuttal	WV	West Virginia Energy Users Group	Monongahela Power, Potomac Edison, Appalachian Power, Wheeling Power	Regulatory assets and liabilities.
10/99	U-24182 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, affiliate transactions, tax issues, and other revenue requirement issues.
11/99	PUC Docket 21527	TX	The Dallas-Fort Worth Hospital Council and Coalition of Independent Colleges and Universities	TXU Electric	Restructuring, stranded costs, taxes, securitization.
11/99	U-23358 Surrebuttal Affiliate Transactions Review	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Service company affiliate transaction costs.
01/00	U-24182 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, affiliate transactions, tax issues, and other revenue requirement issues.
04/00	99-1212-EL-ETP 99-1213-EL-ATA 99-1214-EL-AAM	OH	Greater Cleveland Growth Association	First Energy (Cleveland Electric Illuminating, Toledo Edison)	Historical review, stranded costs, regulatory assets, liabilities.

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Date	Case	Jurisdct.	Party	Utility	Subject
05/00	2000-107	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	ECR surcharge roll-in to base rates.
05/00	U-24182 Supplemental Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Affiliate expense proforma adjustments.
05/00	A-110550F0147	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy	Merger between PECO and Unicom.
05/00	99-1658-EL-ETP	OH	AK Steel Corp.	Cincinnati Gas & Electric Co.	Regulatory transition costs, including regulatory assets and liabilities, SFAS 109, ADIT, EDIT, ITC.
07/00	PUC Docket 22344	TX	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges and Universities	Statewide Generic Proceeding	Escalation of O&M expenses for unbundled T&D revenue requirements in projected test year.
07/00	U-21453	LA	Louisiana Public Service Commission	SWEPCO	Stranded costs, regulatory assets and liabilities.
08/00	U-24064	LA	Louisiana Public Service Commission Staff	CLECO	Affiliate transaction pricing ratemaking principles, subsidization of nonregulated affiliates, ratemaking adjustments.
10/00	SOAH Docket 473-00-1015 PUC Docket 22350	TX	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges and Universities	TXU Electric Co.	Restructuring, T&D revenue requirements, mitigation, regulatory assets and liabilities.
10/00	R-00974104 Affidavit	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Final accounting for stranded costs, including treatment of auction proceeds, taxes, capital costs, switchback costs, and excess pension funding.
11/00	P-00001837 R-00974008 P-00001838 R-00974009	PA	Metropolitan Edison Industrial Users Group Penelec Industrial Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Final accounting for stranded costs, including treatment of auction proceeds, taxes, regulatory assets and liabilities, transaction costs.
12/00	U-21453, U-20925, U-22092 (Subdocket C) Surrebuttal	LA	Louisiana Public Service Commission Staff	SWEPCO	Stranded costs, regulatory assets.
01/01	U-24993 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
01/01	U-21453, U-20925, U-22092 (Subdocket B) Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Industry restructuring, business separation plan, organization structure, hold harmless conditions, financing.
01/01	Case No. 2000-386	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Recovery of environmental costs, surcharge mechanism.

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Date	Case	Jurisdict.	Party	Utility	Subject
01/01	Case No. 2000-439	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Recovery of environmental costs, surcharge mechanism.
02/01	A-110300F0095 A-110400F0040	PA	Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance	GPU, Inc. FirstEnergy Corp.	Merger, savings, reliability.
03/01	P-00001860 P-00001861	PA	Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Recovery of costs due to provider of last resort obligation.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Settlement Term Sheet	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: settlement agreement on overall plan structure.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Contested Issues	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: agreements, hold harmless conditions, separations methodology.
05/01	U-21453, U-20925, U-22092 (Subdocket B) Contested Issues Transmission and Distribution Rebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: agreements, hold harmless conditions, separations methodology.
07/01	U-21453, U-20925, U-22092 (Subdocket B) Transmission and Distribution Term Sheet	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: settlement agreement on T&D issues, agreements necessary to implement T&D separations, hold harmless conditions, separations methodology.
10/01	14000-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Company	Revenue requirements, Rate Plan, fuel clause recovery.
11/01	14311-U Direct Panel with Bolin Killings	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co	Revenue requirements, revenue forecast, O&M expense, depreciation, plant additions, cash working capital.
11/01	U-25687 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, capital structure, allocation of regulated and nonregulated costs, River Bend uprate.
02/02	PUC Docket 25230	TX	The Dallas-Fort Worth Hospital Council and the Coalition of Independent Colleges and Universities	TXU Electric	Stipulation. Regulatory assets, securitization financing.

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Date	Case	Jurisdct.	Party	Utility	Subject
02/02	U-25687 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, River Bend uprate.
03/02	14311-U Rebuttal Panel with Bolin Killings	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements, earnings sharing plan, service quality standards.
03/02	14311-U Rebuttal Panel with Michelle L. Thebert	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements, revenue forecast, O&M expense, depreciation, plant additions, cash working capital.
03/02	001148-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Co.	Revenue requirements. Nuclear life extension, storm damage accruals and reserve, capital structure, O&M expense.
04/02	U-25687 (Suppl. Surrebuttal)	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, River Bend uprate.
04/02	U-21453, U-20925 U-22092 (Subdocket C)	LA	Louisiana Public Service Commission	SWEPCO	Business separation plan, T&D Term Sheet, separations methodologies, hold harmless conditions.
08/02	EL01-88-000	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement, production cost equalization, tariffs.
08/02	U-25888	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc. and Entergy Louisiana, Inc.	System Agreement, production cost disparities, prudence.
09/02	2002-00224 2002-00225	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Line losses and fuel clause recovery associated with off-system sales.
11/02	2002-00146 2002-00147	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Environmental compliance costs and surcharge recovery.
01/03	2002-00169	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Power Co.	Environmental compliance costs and surcharge recovery.
04/03	2002-00429 2002-00430	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Extension of merger surcredit, flaws in Companies' studies.
04/03	U-26527	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
06/03	EL01-88-000 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement, production cost equalization, tariffs.

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Date	Case	Jurisdic.	Party	Utility	Subject
06/03	2003-00068	KY	Kentucky Industrial Utility Customers	Kentucky Utilities Co.	Environmental cost recovery, correction of base rate error.
11/03	ER03-753-000	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Unit power purchases and sale cost-based tariff pursuant to System Agreement.
11/03	ER03-583-000, ER03-583-001, ER03-583-002  ER03-681-000, ER03-681-001  ER03-682-000, ER03-682-001, ER03-682-002  ER03-744-000, ER03-744-001 (Consolidated)	FERC	Louisiana Public Service Commission	Entergy Services, Inc., the Entergy Operating Companies, EWO Marketing, L.P, and Entergy Power, Inc.	Unit power purchases and sale agreements, contractual provisions, projected costs, leveled rates, and formula rates.
12/03	U-26527 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
12/03	2003-0334 2003-0335	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Earnings Sharing Mechanism.
12/03	U-27136	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, Inc.	Purchased power contracts between affiliates, terms and conditions.
03/04	U-26527 Supplemental Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
03/04	2003-00433	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Revenue requirements, depreciation rates, O&M expense, deferrals and amortization, earnings sharing mechanism, merger surcredit, VDT surcredit.
03/04	2003-00434	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements, depreciation rates, O&M expense, deferrals and amortization, earnings sharing mechanism, merger surcredit, VDT surcredit.
03/04	SOAH Docket 473-04-2459 PUC Docket 29206	TX	Cities Served by Texas-New Mexico Power Co.	Texas-New Mexico Power Co.	Stranded costs true-up, including valuation issues, ITC, ADIT, excess earnings.
05/04	04-169-EL-UNC	OH	Ohio Energy Group, Inc.	Columbus Southern Power Co. & Ohio Power Co.	Rate stabilization plan, deferrals, T&D rate increases, earnings.
06/04	SOAH Docket 473-04-4555 PUC Docket 29526	TX	Houston Council for Health and Education	CenterPoint Energy Houston Electric	Stranded costs true-up, including valuation issues, ITC, EDIT, excess mitigation credits, capacity auction true-up revenues, interest.



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Date	Case	Jurisdict.	Party	Utility	Subject
08/04	SOAH Docket 473-04-4555 PUC Docket 29526 (Suppl Direct)	TX	Houston Council for Health and Education	CenterPoint Energy Houston Electric	Interest on stranded cost pursuant to Texas Supreme Court remand.
09/04	U-23327 Subdocket B	LA	Louisiana Public Service Commission Staff	SWEPCO	Fuel and purchased power expenses recoverable through fuel adjustment clause, trading activities, compliance with terms of various LPSC Orders.
10/04	U-23327 Subdocket A	LA	Louisiana Public Service Commission Staff	SWEPCO	Revenue requirements.
12/04	Case Nos. 2004-00321, 2004-00372	KY	Gallatin Steel Co.	East Kentucky Power Cooperative, Inc., Big Sandy Recc, et al.	Environmental cost recovery, qualified costs, TIER requirements, cost allocation.
01/05	30485	TX	Houston Council for Health and Education	CenterPoint Energy Houston Electric, LLC	Stranded cost true-up including regulatory Central Co. assets and liabilities, ITC, EDIT, capacity auction, proceeds, excess mitigation credits, retrospective and prospective ADIT.
02/05	18638-U	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements.
02/05	18638-U Panel with Tony Wackerly	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Comprehensive rate plan, pipeline replacement program surcharge, performance based rate plan.
02/05	18638-U Panel with Michelle Thebert	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Energy conservation, economic development, and tariff issues.
03/05	Case Nos. 2004-00426, 2004-00421	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric	Environmental cost recovery, Jobs Creation Act of 2004 and §199 deduction, excess common equity ratio, deferral and amortization of nonrecurring O&M expense.
06/05	2005-00068	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	Environmental cost recovery, Jobs Creation Act of 2004 and §199 deduction, margins on allowances used for AEP system sales.
06/05	050045-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Co.	Storm damage expense and reserve, RTO costs, O&M expense projections, return on equity performance incentive, capital structure, selective second phase post-test year rate increase.
08/05	31056	TX	Alliance for Valley Healthcare	AEP Texas Central Co.	Stranded cost true-up including regulatory assets and liabilities, ITC, EDIT, capacity auction, proceeds, excess mitigation credits, retrospective and prospective ADIT.
09/05	20298-U	GA	Georgia Public Service Commission Adversary Staff	Atmos Energy Corp.	Revenue requirements, roll-in of surcharges, cost recovery through surcharge, reporting requirements.
09/05	20298-U	GA	Georgia Public Service	Atmos Energy Corp.	Affiliate transactions, cost allocations, capitalization,

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Date	Case	Jurisdict.	Party	Utility	Subject
	Panel with Victoria Taylor		Commission Adversary Staff		cost of debt.
10/05	04-42	DE	Delaware Public Service Commission Staff	Artesian Water Co.	Allocation of tax net operating losses between regulated and unregulated.
11/05	2005-00351 2005-00352	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric	Workforce Separation Program cost recovery and shared savings through VDT surcredit.
01/06	2005-00341	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	System Sales Clause Rider, Environmental Cost Recovery Rider. Net Congestion Rider, Storm damage, vegetation management program, depreciation, off-system sales, maintenance normalization, pension and OPEB.
03/06	PUC Docket 31994	TX	Cities	Texas-New Mexico Power Co.	Stranded cost recovery through competition transition or change.
05/06	31994 Supplemental	TX	Cities	Texas-New Mexico Power Co.	Retrospective ADFIT, prospective ADFIT.
03/06	U-21453, U-20925, U-22092 (Subdocket B)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Jurisdictional separation plan.
03/06	NOPR Reg 104385-OR	IRS	Alliance for Valley Health Care and Houston Council for Health Education	AEP Texas Central Company and CenterPoint Energy Houston Electric	Proposed Regulations affecting flow-through to ratepayers of excess deferred income taxes and investment tax credits on generation plant that is sold or deregulated.
04/06	U-25116	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, Inc.	2002-2004 Audit of Fuel Adjustment Clause Filings. Affiliate transactions.
07/06	R-00061366, Et. al.	PA	Met-Ed Ind. Users Group Pennsylvania Ind. Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Recovery of NUG-related stranded costs, government mandated program costs, storm damage costs.
07/06	U-23327	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co.	Revenue requirements, formula rate plan, banking proposal.
08/06	U-21453, U-20925, U-22092 (Subdocket J)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Jurisdictional separation plan.
11/06	05CVH03-3375 Franklin County Court Affidavit	OH	Various Taxing Authorities (Non-Utility Proceeding)	State of Ohio Department of Revenue	Accounting for nuclear fuel assemblies as manufactured equipment and capitalized plant.
12/06	U-23327 Subdocket A Reply Testimony	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co.	Revenue requirements, formula rate plan, banking proposal.
03/07	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc., Entergy Louisiana, LLC	Jurisdictional allocation of Entergy System Agreement equalization remedy receipts.

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Date	Case	Jurisdict.	Party	Utility	Subject
03/07	PUC Docket 33309	TX	Cities	AEP Texas Central Co.	Revenue requirements, including functionalization of transmission and distribution costs.
03/07	PUC Docket 33310	TX	Cities	AEP Texas North Co.	Revenue requirements, including functionalization of transmission and distribution costs.
03/07	2006-00472	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative	Interim rate increase, RUS loan covenants, credit facility requirements, financial condition.
03/07	U-29157	LA	Louisiana Public Service Commission Staff	Cleco Power, LLC	Permanent (Phase II) storm damage cost recovery.
04/07	U-29764 Supplemental and Rebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc., Entergy Louisiana, LLC	Jurisdictional allocation of Entergy System Agreement equalization remedy receipts.
04/07	ER07-682-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Allocation of intangible and general plant and A&G expenses to production and state income tax effects on equalization remedy receipts.
04/07	ER07-684-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Fuel hedging costs and compliance with FERC USOA.
05/07	ER07-682-000 Supplemental Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Allocation of intangible and general plant and A&G expenses to production and account 924 effects on MSS-3 equalization remedy payments and receipts.
06/07	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, LLC, Entergy Gulf States, Inc.	Show cause for violating LPSC Order on fuel hedging costs.
07/07	2006-00472	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative	Revenue requirements, post-test year adjustments, TIER, surcharge revenues and costs, financial need.
07/07	ER07-956-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Storm damage costs related to Hurricanes Katrina and Rita and effects of MSS-3 equalization payments and receipts.
10/07	05-UR-103 Direct	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company, Wisconsin Gas, LLC	Revenue requirements, carrying charges on CWIP, amortization and return on regulatory assets, working capital, incentive compensation, use of rate base in lieu of capitalization, quantification and use of Point Beach sale proceeds.
10/07	05-UR-103 Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company, Wisconsin Gas, LLC	Revenue requirements, carrying charges on CWIP, amortization and return on regulatory assets, working capital, incentive compensation, use of rate base in lieu of capitalization, quantification and use of Point Beach sale proceeds.
10/07	25060-U Direct	GA	Georgia Public Service Commission Public Interest Adversary Staff	Georgia Power Company	Affiliate costs, incentive compensation, consolidated income taxes, §199 deduction.

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Date	Case	Jurisdict.	Party	Utility	Subject
11/07	06-0033-E-CN Direct	WV	West Virginia Energy Users Group	Appalachian Power Company	IGCC surcharge during construction period and post-in-service date.
11/07	ER07-682-000 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization and allocation of intangible and general plant and A&G expenses.
01/08	ER07-682-000 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization and allocation of intangible and general plant and A&G expenses.
01/08	07-551-EL-AIR Direct	OH	Ohio Energy Group, Inc.	Ohio Edison Company, Cleveland Electric Illuminating Company, Toledo Edison Company	Revenue requirements.
02/08	ER07-956-000 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization of expenses, storm damage expense and reserves, tax NOL carrybacks in accounts, ADIT, nuclear service lives and effects on depreciation and decommissioning.
03/08	ER07-956-000 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization of expenses, storm damage expense and reserves, tax NOL carrybacks in accounts, ADIT, nuclear service lives and effects on depreciation and decommissioning.
04/08	2007-00562, 2007-00563	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas and Electric Co.	Merger surcredit.
04/08	26837 Direct Bond, Johnson, Thebert, Kollen Panel	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.
05/08	26837 Rebuttal Bond, Johnson, Thebert, Kollen Panel	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.
05/08	26837 Suppl Rebuttal Bond, Johnson, Thebert, Kollen Panel	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.
06/08	2008-00115	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative, Inc.	Environmental surcharge recoveries, including costs recovered in existing rates, TIER.

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Date	Case	Jurisdict.	Party	Utility	Subject
07/08	27163 Direct	GA	Georgia Public Service Commission Public Interest Advocacy Staff	Atmos Energy Corp.	Revenue requirements, including projected test year rate base and expenses.
07/08	27163 Taylor, Kollen Panel	GA	Georgia Public Service Commission Public Interest Advocacy Staff	Atmos Energy Corp.	Affiliate transactions and division cost allocations, capital structure, cost of debt.
08/08	6680-CE-170 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Nelson Dewey 3 or Colombia 3 fixed financial parameters.
08/08	6680-UR-116 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	CWIP in rate base, labor expenses, pension expense, financing, capital structure, decoupling.
08/08	6680-UR-116 Rebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Capital structure.
08/08	6690-UR-119 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Public Service Corp.	Prudence of Weston 3 outage, incentive compensation, Crane Creek Wind Farm incremental revenue requirement, capital structure.
09/08	6690-UR-119 Surrebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Public Service Corp.	Prudence of Weston 3 outage, Section 199 deduction.
09/08	08-935-EL-SSO, 08-918-EL-SSO	OH	Ohio Energy Group, Inc.	First Energy	Standard service offer rates pursuant to electric security plan, significantly excessive earnings test.
10/08	08-917-EL-SSO	OH	Ohio Energy Group, Inc.	AEP	Standard service offer rates pursuant to electric security plan, significantly excessive earnings test.
10/08	2007-00564, 2007-00565, 2008-00251 2008-00252	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co., Kentucky Utilities Company	Revenue forecast, affiliate costs, ELG v ASL depreciation procedures, depreciation expenses, federal and state income tax expense, capitalization, cost of debt.
11/08	EL08-51	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Spindletop gas storage facilities, regulatory asset and bandwidth remedy.
11/08	35717	TX	Cities Served by Oncor Delivery Company	Oncor Delivery Company	Recovery of old meter costs, asset ADFFIT, cash working capital, recovery of prior year restructuring costs, levelized recovery of storm damage costs, prospective storm damage accrual, consolidated tax savings adjustment.
12/08	27800	GA	Georgia Public Service Commission	Georgia Power Company	AFUDC versus CWIP in rate base, mirror CWIP, certification cost, use of short term debt and trust preferred financing, CWIP recovery, regulatory incentive.
01/09	ER08-1056	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
01/09	ER08-1056 Supplemental Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Blytheville leased turbines; accumulated depreciation.

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02/09	EL08-51 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Spindletop gas storage facilities regulatory asset and bandwidth remedy.
02/09	2008-00409 Direct	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative, Inc.	Revenue requirements.
03/09	ER08-1056 Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
03/09	U-21453, U-20925 U-22092 (Sub J) Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States Louisiana, LLC	Violation of EGSI separation order, ETI and EGSL separation accounting, Spindletop regulatory asset.
04/09	Rebuttal				
04/09	2009-00040 Direct-Interim (Oral)	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Emergency interim rate increase; cash requirements.
04/09	PUC Docket 36530	TX	State Office of Administrative Hearings	Oncor Electric Delivery Company, LLC	Rate case expenses.
05/09	ER08-1056 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
06/09	2009-00040 Direct- Permanent	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Revenue requirements, TIER, cash flow.
07/09	080677-EI	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Multiple test years, GBRA rider, forecast assumptions, revenue requirement, O&M expense, depreciation expense, Economic Stimulus Bill, capital structure.
08/09	U-21453, U- 20925, U-22092 (Subdocket J) Supplemental Rebuttal	LA	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC	Violation of EGSI separation order, ETI and EGSL separation accounting, Spindletop regulatory asset.
08/09	8516 and 29950	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Modification of PRP surcharge to include infrastructure costs.
09/09	05-UR-104 Direct and Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company	Revenue requirements, incentive compensation, depreciation, deferral mitigation, capital structure, cost of debt.
09/09	09AL-299E Answer	CO	CF&I Steel, Rocky Mountain Steel Mills LP, Climax Molybdenum Company	Public Service Company of Colorado	Forecasted test year, historic test year, proforma adjustments for major plant additions, tax depreciation.

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09/09	6680-UR-117 Direct and Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Power and Light Company	Revenue requirements, CWIP in rate base, deferral mitigation, payroll, capacity shutdowns, regulatory assets, rate of return.
10/09	09A-415E Answer	CO	Cripple Creek & Victor Gold Mining Company, et al.	Black Hills/CO Electric Utility Company	Cost prudence, cost sharing mechanism.
10/09	EL09-50 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback accumulated deferred income taxes, Entergy System Agreement bandwidth remedy calculations.
10/09	2009-00329	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	Trimble County 2 depreciation rates.
12/09	PUE-2009-00030	VA	Old Dominion Committee for Fair Utility Rates	Appalachian Power Company	Return on equity incentive.
12/09	ER09-1224 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
01/10	ER09-1224 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
01/10	EL09-50 Rebuttal  Supplemental Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback accumulated deferred income taxes, Entergy System Agreement bandwidth remedy calculations.
02/10	ER09-1224 Final	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
02/10	30442 Wackerly-Kollen Panel	GA	Georgia Public Service Commission Staff	Atmos Energy Corporation	Revenue requirement issues.
02/10	30442 McBride-Kollen Panel	GA	Georgia Public Service Commission Staff	Atmos Energy Corporation	Affiliate/division transactions, cost allocation, capital structure.
02/10	2009-00353	KY	Kentucky Industrial Utility Customers, Inc.,  Attorney General	Louisville Gas and Electric Company, Kentucky Utilities Company	Ratemaking recovery of wind power purchased power agreements.
03/10	2009-00545	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Ratemaking recovery of wind power purchased power agreement.
03/10	E015/GR-09-1151	MN	Large Power Interveners	Minnesota Power	Revenue requirement issues, cost overruns on environmental retrofit project.

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04/10	2009-00459	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Revenue requirement issues.
04/10	2009-00548, 2009-00549	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas and Electric Company	Revenue requirement issues.
08/10	31647	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Revenue requirement and synergy savings issues.
08/10	31647 Wackerly-Kollen Panel	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Affiliate transaction and Customer First program issues.
08/10	2010-00204	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	PPL acquisition of E.ON U.S. (LG&E and KU) conditions, acquisition savings, sharing deferral mechanism.
09/10	38339 Direct and Cross-Rebuttal	TX	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Revenue requirement issues, including consolidated tax savings adjustment, incentive compensation FIN 48; AMS surcharge including roll-in to base rates; rate case expenses.
09/10	EL10-55	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Operating Cos	Depreciation rates and expense input effects on System Agreement tariffs.
09/10	2010-00167	KY	Gallatin Steel	East Kentucky Power Cooperative, Inc.	Revenue requirements.
09/10	U-23327 Subdocket E Direct	LA	Louisiana Public Service Commission	SWEPCO	Fuel audit: SO2 allowance expense, variable O&M expense, off-system sales margin sharing.
11/10	U-23327 Rebuttal	LA	Louisiana Public Service Commission	SWEPCO	Fuel audit: SO2 allowance expense, variable O&M expense, off-system sales margin sharing.
09/10	U-31351	LA	Louisiana Public Service Commission Staff	SWEPCO and Valley Electric Membership Cooperative	Sale of Valley assets to SWEPCO and dissolution of Valley.
10/10	10-1261-EL-UNC	OH	Ohio OCC, Ohio Manufacturers Association, Ohio Energy Group, Ohio Hospital Association, Appalachian Peace and Justice Network	Columbus Southern Power Company	Significantly excessive earnings test.
10/10	10-0713-E-PC	WV	West Virginia Energy Users Group	Monongahela Power Company, Potomac Edison Power Company	Merger of First Energy and Allegheny Energy.



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10/10	U-23327 Subdocket F Direct	LA	Louisiana Public Service Commission Staff	SWEPCO	AFUDC adjustments in Formula Rate Plan.
11/10	EL10-55 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Operating Cos	Depreciation rates and expense input effects on System Agreement tariffs.
12/10	ER10-1350 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. Entergy Operating Cos	Waterford 3 lease amortization, ADIT, and fuel inventory effects on System Agreement tariffs.
01/11	ER10-1350 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Operating Cos	Waterford 3 lease amortization, ADIT, and fuel inventory effects on System Agreement tariffs.
03/11	ER10-2001 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Arkansas, Inc.	EAI depreciation rates.
04/11	Cross-Answering				
04/11	U-23327 Subdocket E	LA	Louisiana Public Service Commission Staff	SWEPCO	Settlement, incl resolution of SO2 allowance expense, var O&M expense, sharing of OSS margins.
04/11	38306 Direct	TX	Cities Served by Texas- New Mexico Power Company	Texas-New Mexico Power Company	AMS deployment plan, AMS Surcharge, rate case expenses.
05/11	Suppl Direct				
05/11	11-0274-E-GI	WV	West Virginia Energy Users Group	Appalachian Power Company, Wheeling Power Company	Deferral recovery phase-in, construction surcharge.
05/11	2011-00036	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Revenue requirements.
06/11	29849	GA	Georgia Public Service Commission Staff	Georgia Power Company	Accounting issues related to Vogtle risk-sharing mechanism.
07/11	ER11-2161 Direct and Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and Entergy Texas, Inc.	ETI depreciation rates; accounting issues.
07/11	PUE-2011-00027	VA	Virginia Committee for Fair Utility Rates	Virginia Electric and Power Company	Return on equity performance incentive.
07/11	11-346-EL-SSO 11-348-EL-SSO 11-349-EL-AAM 11-350-EL-AAM	OH	Ohio Energy Group	AEP-OH	Equity Stabilization Incentive Plan; actual earned returns; ADIT offsets in riders.
08/11	U-23327 Subdocket F Rebuttal	LA	Louisiana Public Service Commission Staff	SWEPCO	Depreciation rates and service lives; AFUDC adjustments.
08/11	05-UR-105	WI	Wisconsin Industrial Energy Group	WE Energies, Inc.	Suspended amortization expenses; revenue requirements.

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08/11	ER11-2161 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and Entergy Texas, Inc.	ETI depreciation rates; accounting issues.
09/11	PUC Docket 39504	TX	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Investment tax credit, excess deferred income taxes; normalization.
09/11	2011-00161 2011-00162	KY	Kentucky Industrial Utility Consumers, Inc.	Louisville Gas & Electric Company, Kentucky Utilities Company	Environmental requirements and financing.
10/11	11-4571-EL-UNC 11-4572-EL-UNC	OH	Ohio Energy Group	Columbus Southern Power Company, Ohio Power Company	Significantly excessive earnings.
10/11	4220-UR-117 Direct	WI	Wisconsin Industrial Energy Group	Northern States Power-Wisconsin	Nuclear O&M, depreciation.
11/11	4220-UR-117 Surrebuttal	WI	Wisconsin Industrial Energy Group	Northern States Power-Wisconsin	Nuclear O&M, depreciation.
11/11	PUC Docket 39722	TX	Cities Served by AEP Texas Central Company	AEP Texas Central Company	Investment tax credit, excess deferred income taxes; normalization.
02/12	PUC Docket 40020	TX	Cities Served by Oncor	Lone Star Transmission, LLC	Temporary rates.
03/12	11AL-947E Answer	CO	Climax Molybdenum Company and CF&I Steel, L.P. d/b/a Evraz Rocky Mountain Steel	Public Service Company of Colorado	Revenue requirements, including historic test year, future test year, CACJA CWIP, contra-AFUDC.
03/12	2011-00401	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Big Sandy 2 environmental retrofits and environmental surcharge recovery.
4/12	2011-00036 Direct Rehearing Supplemental Rebuttal Rehearing	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Rate case expenses, depreciation rates and expense.
04/12	10-2929-EL-UNC	OH	Ohio Energy Group	AEP Ohio Power	State compensation mechanism, CRES capacity charges, Equity Stabilization Mechanism
05/12	11-346-EL-SSO 11-348-EL-SSO	OH	Ohio Energy Group	AEP Ohio Power	State compensation mechanism, Equity Stabilization Mechanism, Retail Stability Rider.
05/12	11-4393-EL-RDR	OH	Ohio Energy Group	Duke Energy Ohio, Inc.	Incentives for over-compliance on EE/PDR mandates.

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06/12	40020	TX	Cities Served by Oncor	Lone Star Transmission, LLC	Revenue requirements, including ADIT, bonus depreciation and NOL, working capital, self insurance, depreciation rates, federal income tax expense.
07/12	120015-EI	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Revenue requirements, including vegetation management, nuclear outage expense, cash working capital, CWIP in rate base.
07/12	2012-00063	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Environmental retrofits, including environmental surcharge recovery.
09/12	05-UR-106	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Electric Power Company	Section 1603 grants, new solar facility, payroll expenses, cost of debt.
10/12	2012-00221 2012-00222	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	Revenue requirements, including off-system sales, outage maintenance, storm damage, injuries and damages, depreciation rates and expense.
10/12	120015-EI Direct	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Settlement issues.
11/12	120015-EI Rebuttal	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Settlement issues.
10/12	40604	TX	Steering Committee of Cities Served by Oncor	Cross Texas Transmission, LLC	Policy and procedural issues, revenue requirements, including AFUDC, ADIT – bonus depreciation & NOL, incentive compensation, staffing, self-insurance, net salvage, depreciation rates and expense, income tax expense.
11/12	40627 Direct	TX	City of Austin d/b/a Austin Energy	City of Austin d/b/a Austin Energy	Rate case expenses.
12/12	40443	TX	Cities Served by SWEPCO	Southwestern Electric Power Company	Revenue requirements, including depreciation rates and service lives, O&M expenses, consolidated tax savings, CWIP in rate base, Turk plant costs.
12/12	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	Termination of purchased power contracts between EGSL and ETI, Spindletop regulatory asset.
01/13	ER12-1384 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	Little Gypsy 3 cancellation costs.
02/13	40627 Rebuttal	TX	City of Austin d/b/a Austin Energy	City of Austin d/b/a Austin Energy	Rate case expenses.
03/13	12-426-EL-SSO	OH	The Ohio Energy Group	The Dayton Power and Light Company	Capacity charges under state compensation mechanism, Service Stability Rider, Switching Tracker.

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04/13	12-2400-EL-UNC	OH	The Ohio Energy Group	Duke Energy Ohio, Inc.	Capacity charges under state compensation mechanism, deferrals, rider to recover deferrals.
04/13	2012-00578	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Resource plan, including acquisition of interest in Mitchell plant.
05/13	2012-00535	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Revenue requirements, excess capacity, restructuring.
06/13	12-3254-EL-UNC	OH	The Ohio Energy Group, Inc.,  Office of the Ohio Consumers' Counsel	Ohio Power Company	Energy auctions under CBP, including reserve prices.
07/13	2013-00144	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Biomass renewable energy purchase agreement.
07/13	2013-00221	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Agreements to provide Century Hawesville Smelter market access.
10/13	2013-00199	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Revenue requirements, excess capacity, restructuring.
12/13	2013-00413	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Agreements to provide Century Sebree Smelter market access.
01/14	ER10-1350 Direct and Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 lease accounting and treatment in annual bandwidth filings.
02/14	U-32981	LA	Louisiana Public Service Commission	Entergy Louisiana, LLC	Montauk renewable energy PPA.
04/14	ER13-432 Direct	FERC	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	Union Pacific Settlement benefits and damages.
05/14	PUE-2013-00132	VA	HP Hood LLC	Shenandoah Valley Electric Cooperative	Market based rate; load control tariffs.
07/14	PUE-2014-00033	VA	Virginia Committee for Fair Utility Rates	Virginia Electric and Power Company	Fuel and purchased power hedge accounting, change in FAC Definitional Framework.
08/14	ER13-432 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	Union Pacific Settlement benefits and damages.
08/14	2014-00134	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Requirements power sales agreements with Nebraska entities.
09/14	E-015/CN-12-1163 Direct	MN	Large Power Intervenors	Minnesota Power	Great Northern Transmission Line; cost cap; AFUDC v. current recovery; rider v. base recovery; class cost allocation.
10/14	2014-00225	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Allocation of fuel costs to off-system sales.

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10/14	ER13-1508	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy service agreements and tariffs for affiliate power purchases and sales; return on equity.
10/14	14-0702-E-42T 14-0701-E-D	WV	West Virginia Energy Users Group	First Energy-Monongahela Power, Potomac Edison	Consolidated tax savings; payroll; pension, OPEB, amortization; depreciation; environmental surcharge.
11/14	E-015/CN-12-1163 Surrebuttal	MN	Large Power Intervenors	Minnesota Power	Great Northern Transmission Line; cost cap; AFUDC v. current recovery; rider v. base recovery; class allocation.
11/14	05-376-EL-UNC	OH	Ohio Energy Group	Ohio Power Company	Refund of IGCC CWIP financing cost recoveries.
11/14	14AL-0660E	CO	Climax, CF&I Steel	Public Service Company of Colorado	Historic test year v. future test year; AFUDC v. current return; CACJA rider, transmission rider; equivalent availability rider; ADIT; depreciation; royalty income; amortization.
12/14	EL14-026	SD	Black Hills Industrial Intervenors	Black Hills Power Company	Revenue requirement issues, including depreciation expense and affiliate charges.
12/14	14-1152-E-42T	WV	West Virginia Energy Users Group	AEP-Appalachian Power Company	Income taxes, payroll, pension, OPEB, deferred costs and write offs, depreciation rates, environmental projects surcharge.
01/15	9400-YO-100 Direct	WI	Wisconsin Industrial Energy Group	Wisconsin Energy Corporation	WEC acquisition of Integrys Energy Group, Inc.
01/15	14F-0336EG 14F-0404EG	CO	Development Recovery Company LLC	Public Service Company of Colorado	Line extension policies and refunds.
02/15	9400-YO-100 Rebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Energy Corporation	WEC acquisition of Integrys Energy Group, Inc.
03/15	2014-00396	KY	Kentucky Industrial Utility Customers, Inc.	AEP-Kentucky Power Company	Base, Big Sandy 2 retirement rider, environmental surcharge, and Big Sandy 1 operation rider revenue requirements, depreciation rates, financing, deferrals.
03/15	2014-00371 2014-00372	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company and Louisville Gas and Electric Company	Revenue requirements, staffing and payroll, depreciation rates.
04/15	2014-00450	KY	Kentucky Industrial Utility Customers, Inc. and the Attorney General of the Commonwealth of Kentucky	AEP-Kentucky Power Company	Allocation of fuel costs between native load and off-system sales.
04/15	2014-00455	KY	Kentucky Industrial Utility Customers, Inc. and the Attorney General of the Commonwealth of Kentucky	Big Rivers Electric Corporation	Allocation of fuel costs between native load and off-system sales.

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04/15	ER2014-0370	MO	Midwest Energy Consumers' Group	Kansas City Power & Light Company	Affiliate transactions, operation and maintenance expense, management audit.
05/15	PUE-2015-00022	VA	Virginia Committee for Fair Utility Rates	Virginia Electric and Power Company	Fuel and purchased power hedge accounting; change in FAC Definitional Framework.
05/15 09/15	EL10-65 Direct, Rebuttal Complaint	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Accounting for AFUDC Debt, related ADIT.
07/15	EL10-65 Direct and Answering Consolidated Bandwidth Dockets	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback ADIT, Bandwidth Formula.
09/15	14-1693-EL-RDR	OH	Public Utilities Commission of Ohio	Ohio Energy Group	PPA rider for charges or credits for physical hedges against market.
12/15	45188	TX	Cities Served by Oncor Electric Delivery Company	Oncor Electric Delivery Company	Hunt family acquisition of Oncor; transaction structure; income tax savings from real estate investment trust (REIT) structure; conditions.
12/15 01/16	6680-CE-176 Direct, Surrebuttal, Supplemental Rebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Need for capacity and economics of proposed Riverside Energy Center Expansion project; ratemaking conditions.
03/16 03/16 04/16 05/16 06/16	EL01-88 Remand Direct Answering Cross-Answering Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Bandwidth Formula: Capital structure, fuel inventory, Waterford 3 sale/leaseback, Vidalia purchased power, ADIT, Blythesville, Spindletop, River Bend AFUDC, property insurance reserve, nuclear depreciation expense.
03/16	15-1673-E-T	WV	West Virginia Energy Users Group	Appalachian Power Company	Terms and conditions of utility service for commercial and industrial customers, including security deposits.
04/16	39971 Panel Direct	GA	Georgia Public Service Commission Staff	Southern Company, AGL Resources, Georgia Power Company, Atlanta Gas Light Company	Southern Company acquisition of AGL Resources, risks, opportunities, quantification of savings, ratemaking implications, conditions, settlement.
04/16	2015-00343	KY	Office of the Attorney General	Atmos Energy Corporation	Revenue requirements, including NOL ADIT, affiliate transactions.
04/16	2016-00070	KY	Office of the Attorney General	Atmos Energy Corporation	R & D Rider.

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05/16	2016-00026 2016-00027	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Need for environmental projects, calculation of environmental surcharge rider.
05/16	16-G-0058 16-G-0059	NY	New York City	Keyspan Gas East Corp., Brooklyn Union Gas Company	Depreciation, including excess reserves, leak prone pipe.
06/16	160088-EI	FL	South Florida Hospital and Healthcare Association	Florida Power and Light Company	Fuel Adjustment Clause Incentive Mechanism re: economy sales and purchases, asset optimization.
07/16	160021-EI	FL	South Florida Hospital and Healthcare Association	Florida Power and Light Company	Revenue requirements, including capital recovery, depreciation, ADIT.
07/16	16-057-01	UT	Office of Consumer Services	Dominion Resources, Inc. / Questar Corporation	Merger, risks, harms, benefits, accounting.
08/16	15-1022-EL-UNC 16-1105-EL-UNC	OH	Ohio Energy Group	AEP Ohio Power Company	SEET earnings, effects of other pending proceedings.
9/16	2016-00162	KY	Office of the Attorney General	Columbia Gas Kentucky	Revenue requirements, O&M expense, depreciation, affiliate transactions.
09/16	E-22 Sub 519, 532, 533	NC	Nucor Steel	Dominion North Carolina Power Company	Revenue requirements, deferrals and amortizations.
09/16	15-1256-G-390P (Reopened) 16-0922-G-390P	WV	West Virginia Energy Users Group	Mountaineer Gas Company	Infrastructure rider, including NOL ADIT and other income tax normalization and calculation issues.
10/16	10-2929-EL-UNC 11-346-EL-SSO 11-348-EL-SSO 11-349-EL-SSO 11-350-EL-SSO 14-1186-EL-RDR	OH	Ohio Energy Group	AEP Ohio Power Company	State compensation mechanism, capacity cost, Retail Stability Rider deferrals, refunds, SEET.
11/16	16-0395-EL-SSO Direct	OH	Ohio Energy Group	Dayton Power & Light Company	Credit support and other riders; financial stability of Utility, holding company.
12/16	Formal Case 1139	DC	Healthcare Council of the National Capital Area	Potomac Electric Power Company	Post test year adjust, merger costs, NOL ADIT, incentive compensation, rent.
01/17	46238	TX	Steering Committee of Cities Served by Oncor	Oncor Electric Delivery Company	Next Era acquisition of Oncor; goodwill, transaction costs, transition costs, cost deferrals, ratemaking issues.
02/17	16-0395-EL-SSO Direct (Stipulation)	OH	Ohio Energy Group	Dayton Power & Light Company	Non-unanimous stipulation re: credit support and other riders; financial stability of utility, holding company.
02/17	45414	TX	Cities of Midland, McAllen, and Colorado City	Sharyland Utilities, LP, Sharyland Distribution & Transmission Services, LLC	Income taxes, depreciation, deferred costs, affiliate expenses.

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03/17	2016-00370 2016-00371	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas and Electric Company	AMS, capital expenditures, maintenance expense, amortization expense, depreciation rates and expense.
06/17	29849 (Panel with Philip Hayet)	GA	Georgia Public Service Commission Staff	Georgia Power Company	Vogtle 3 and 4 economics.
08/17	17-0296-E-PC	WV	West Virginia Energy Users Group	Monongahela Power Company, The Potomac Edison Power Company	ADIT, OPEB.
10/17	2017-00179	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Weather normalization, Rockport lease, O&M, incentive compensation, depreciation, income taxes.
10/17	2017-00287	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Fuel cost allocation to native load customers.
12/17	2017-00321	KY	Attorney General	Duke Energy Kentucky (Electric)	Revenues, depreciation, income taxes, O&M, regulatory assets, environmental surcharge rider, FERC transmission cost reconciliation rider.
12/17	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	Vogtle 3 and 4 economics, tax abandonment loss.
01/18	2017-00349	KY	Kentucky Attorney General	Atmos Energy Kentucky	O&M expense, depreciation, regulatory assets and amortization, Annual Review Mechanism, Pipeline Replacement Program and Rider, affiliate expenses.
06/18	18-0047	OH	Ohio Energy Group	Ohio Electric Utilities	Tax Cuts and Jobs Act. Reduction in income tax expense; amortization of excess ADIT.
07/18	T-34695	LA	LPSC Staff	Crimson Gulf, LLC	Revenues, depreciation, income taxes, O&M, ADIT.
08/18	48325	TX	Cities Served by Oncor	Oncor Electric Delivery Company	Tax Cuts and Jobs Act; amortization of excess ADIT.
08/18	48401	TX	Cities Served by TNMP	Texas-New Mexico Power Company	Revenues, payroll, income taxes, amortization of excess ADIT, capital structure.
08/18	2018-00146	KY	KIUC	Big Rivers Electric Corporation	Station Two contracts termination, regulatory asset, regulatory liability for savings
09/18	20170235-EI 20170236-EU	FL	Office of Public Counsel	Florida Power & Light Company	FP&L acquisition of City of Vero Beach municipal electric utility systems.
10/18	Direct Supplemental Direct				



**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
09/18	2017-370-E Direct	SC	Office of Regulatory Staff	South Carolina Electric & Gas Company and Dominion Energy, Inc.	Recovery of Summer 2 and 3 new nuclear development costs, related regulatory liabilities, securitization, NOL carryforward and ADIT, TCJA savings, merger conditions and savings.
10/18	2017-207, 305, 370-E Surrebuttal Supplemental Surrebuttal				
12/18	2018-00261	KY	Attorney General	Duke Energy Kentucky (Gas)	Revenues, O&M, regulatory assets, payroll, integrity management, incentive compensation, cash working capital.
01/19	2018-00294 2018-00295	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas & Electric Company	AFUDC v. CWIP in rate base, transmission and distribution plant additions, capitalization, revenues generation outage expense, depreciation rates and expenses, cost of debt.
01/19	2018-00281	KY	Attorney General	Atmos Energy Corp.	AFUDC v. CWIP in rate base, ALG v. ELG depreciation rates, cash working capital, PRP Rider, forecast plant additions, forecast expenses, cost of debt, corporate cost allocation.
02/19	UD-18-07 Direct	New Orleans	Crescent City Power Users Group	Entergy New Orleans, LLC	Post-test year adjustments, storm reserve fund, NOL ADIT, FIN48 ADIT, cash working capital, depreciation, amortization, capital structure, formula rate plans, purchased power rider.
04/19	Surrebuttal and Cross-Answering				
03/19	2018-00358	KY	Attorney General	Kentucky American Water Company	Capital expenditures, cash working capital, payroll expense, incentive compensation, chemicals expense, electricity expense, water losses, rate case expense, excess deferred income taxes.
03/19	48929	TX	Steering Committee of Cities Served by Oncor	Oncor Electric Delivery Company LLC, Sempra Energy, Sharyland Distribution & Transmission Services, L.L.C., Sharyland Utilities, L.P.	Sale, transfer, merger transactions, hold harmless and other regulatory conditions.
06/19	49421	TX	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Prepaid pension asset, accrued OPEB liability, regulatory assets and liabilities, merger savings, storm damage expense, excess deferred income taxes.
07/19	49494	TX	Cities Served by AEP Texas	AEP Texas, Inc.	Plant in service, prepaid pension asset, O&M, ROW costs, incentive compensation, self-insurance expense, excess deferred income taxes.
08/19	19-G-0309 19-G-0310	NY	New York City	National Grid	Depreciation rates, net negative salvage.

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdct.	Party	Utility	Subject
10/19	42315	GA	Atlanta Gas Light Company	Public Interest Advocacy Staff	Capital expenditures, O&M expense, prepaid pension asset, incentive compensation, merger savings, affiliate expenses, excess deferred income taxes.
10/19	45253	IN	Duke Energy Indiana	Office of Utility Consumer Counselor	Prepaid pension asset, inventories, regulatory assets and liabilities, unbilled revenues, incentive compensation, income tax expense, affiliate charges, ADIT, riders.
12/19	2019-00271	KY	Attorney General	Duke Energy Kentucky	ADIT, EDIT, CWC, payroll expense, incentive compensation expense, depreciation rates, pilot programs
05/20	202000067-EI	FL	Office of Public Counsel	Tampa Electric Company	Storm Protection Plan.
06/20	20190038-EI	FL	Office of Public Counsel	Gulf Power Company	Hurricane Michael costs.
07/20	PUR-2020-00015 Direct	VA	Old Dominion Committee for Fair Utility Rates	Appalachian Power Company	Coal Amortization Rider, storm damage, prepaid pension and OPEB assets, return on joint-use assets.
09/20	Surrebuttal				
07/20	2019-226-E Direct	SC	Office of Regulatory Staff	Dominion Energy South Carolina	Integrated Resource Plan.
09/20	Surrebuttal				
10/20	2020-00160	KY	Attorney General	Water Service Corporation of Kentucky	Return on rate base v. operating ratio.
10/20	2020-00174	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Rate base v. capitalization, Rockport UPA, prepaid pension and OPEB, cash working capital, incentive compensation, Rockport 2 depreciation expense, EDIT, AMI, grid modernization rider.
11/20	2020-125-E Direct	SC	Office of Regulatory Staff	Dominion Energy South Carolina	Summer 2 and 3 cancelled plant and transmission cost recovery; TCJA; regulatory assets.
12/20	Surrebuttal				
12/20	2020172-EI	FL	Office of Public Counsel	Florida Power & Light Company	Hurricane Dorian costs.
12/20	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM23, Vogtle 3 and 4 rate impact analyses.
02/21	2019-224-E	SC	Office of Regulatory Staff	Duke Energy Carolinas, LLC, Duke Energy Progress, LLC	Integrated Resource Plans.
04/21	2019-225-E Direct				
04/21	Surrebuttal				
03/21	51611	TX	Steering Committee of Cities Served by Oncor	Sharyland Utilities, L.L.C.	ADIT, capital structure, return on equity.

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
03/21	2020-00349 2020-00350	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company and Louisville Gas and Electric Company	Rate base v. capitalization, retired plant costs, depreciation, securitization, staffing + payroll, pension + OPEB, AML, off-system sales margins.
04/21 Direct	18-857-EL-UNC 19-1338-EL-UNC 20-1034-EL-UNC 20-1476-EL-UNC	OH	The Ohio Energy Group	First Energy Ohio Companies	Significantly Excessive Earnings Test; legacy nuclear plant costs.
07/21	Supplemental Direct				
05/21	2021-00004 Direct	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	CPCN for CCR/ELG Projects at Mitchell Plant.
06/21	Supplemental Direct				
06/21	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM24, Vogtle 3 and 4 rate impact analyses.
06/21	2021-00103	KY	Attorney General and Nucor Steel Gallatin	East Kentucky Power Cooperative, Inc.	Revenues, depreciation, interest, TIER, O&M, regulatory asset.
07/21	U-35441 Direct	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Company	Revenues, O&M expense, depreciation, retirement rider.
08/21 10/21	Cross-Answering Surrebuttal				
09/21	2021-00190	KY	Attorney General	Duke Energy Kentucky	Revenues, O&M expense, depreciation, capital structure, cost of long-term debt, government mandate rider.
09/21	43838	GA	Public Interest Advocacy Staff	Georgia Power Company	Vogtle 3 base rates, NCCR rates; deferrals.
09/21	2021-00214	KY	Attorney General	Atmos Energy Corp.	NOL ADIT, working capital, affiliate expenses, amortization EDIT, capital structure, cost of debt, accelerated replacement Aldyl-A pipe, PRP Rider, Tax Act Adjustment Rider.
12/21	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM25, Vogtle 3 and 4 rate impact analyses.
01/22	2021-00358	KY	Attorney General	Jackson Purchase Energy Corporation	Revenues, nonrecurring expenses, normalized expenses, interest expense, TIER.
01/22	2021-00421	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Proposed Mitchell Plant Operations and Maintenance and Ownership Agreements; sale of Mitchell Plant interest.

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
02/22	2021-00481	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Proposed Liberty Utilities, Inc. acquisition of Kentucky Power Company; harm to customers; conditions to mitigate harm.
03/22	2021-00407	KY	Attorney General	South Kentucky Rural Electric Cooperative Corporation	Revenues, interest income, interest expense, TIER, payroll.
03/22	U-36190	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, LLC	Certification of solar resources.
04/22	Direct Cross-Answering				
05/22	20200241-EI 20210078-EI 20210079-EI	FL	Office of Public Counsel	Florida Power & Light Company, Gulf Power Company	Hurricanes Sally, Zeta, Isaias; Tropical Storm Eta, pre-planning, restoration and repair, costs, ratemaking recovery.
05/22	U-36268	LA	Louisiana Public Service Commission Staff	1803 Electric Cooperative, Inc.	Wholesale power contracts, wholesale rate tariffs, wholesale rates.
06/22	20220048-EI 20220049-EI 20220050-EI 20220051-EI	FL	Office of Public Counsel	Tampa Electric Company, Florida Public Utilities Company, Duke Energy Florida, LLC, Florida Power & Light Company	Storm Protection Plans. prudence, reasonableness, cost recovery, including deferred return on CWIP.
06/22	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM26, Vogtle 3 and 4 rate impact analyses.
07/22	S-36267	LA	Louisiana Public Service Commission Staff	1803 Electric Cooperative, Inc.	Non-opposition to establish revolving LOC and supporting guarantees by member cooperatives.
08/22	53601	TX	Steering Committee of Cities Served by Oncor	Oncor Electric Delivery Company, LLC	Vendor financing, customer advances, cash working capital, ADFIT and temporary differences, depreciation expense, amortization expense.
09/22	20220010-EI	FL	Office of Public Counsel	Tampa Electric Company, Florida Public Utilities Company, Duke Energy Florida, LLC, Florida Power & Light Company	Storm Protection Plan, Cost Recovery Clause, prudence, reasonableness, deferred return on CWIP.
10/22	5-UR-110	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company	Levelized recovery of retired plan costs, securitization financing.
10/22	2022-00283	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Rockport deferrals and recoveries.
12/22	2022-00263	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Fuel adjustment clause methodology and disallowances.

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdiction	Party	Utility	Subject
01/23	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM27, Vogtle 3 and 4 rate impact analyses.
1/23	2022-256-E Direct	SC	Office of Regulatory Staff	Duke Energy Progress, LLC	Storm response process, costs, deferrals, deferred carrying costs.
02/23	Surrebuttal				
03/23	2022-00372	KY	Attorney General	Duke Energy Kentucky, Inc.	Cash working capital, depreciation, decommissioning, regulatory asset amortization, retired generation asset recovery, modifications to existing tariffs, proposed new tariffs.
06/23	20230023-GU	FL	Office of Public Counsel	Peoples Gas System, Inc.	Restructuring, staffing, O&M expenses, storm expense, depreciation expense, amortization of theoretical depreciation surplus.
07/23	2022-00402	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company and Louisville Gas and Electric Company	CPCNs for combined cycle and owned solar resources, acquisition of PPA solar resources, retirement of coal resources.
07/23	2023-89-E Direct	SC	Office of Regulatory Staff	Duke Energy Progress, LLC	Securitization financing, quantifiable net benefits, regulatory liability for return on ADIT, financing order and tariff language for calculation of storm recovery charges.
08/23	Surrebuttal				
08/23	U-36685	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, LLC	Certification of solar PPAs and related ratemaking.
09/23	6680-UR-124 Direct Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Power and Light Company	Ratemaking alternatives for recovery of retired plant costs, including securitization financing.
09/23	05-UR-110 (Reopener) Direct	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company	Ratemaking alternatives for recovery of retired plant costs, including securitization financing.
10/23	29849	GA	Georgia Public Service Commission Staff	Georgia Power Company	Vogtle 3 and 4 prudence.
10/23	2023-00159	KY	Attorney General Kentucky Industrial Utility Customer, Inc.	Kentucky Power Company	NOL, COR, and other ADIT, incentive comp, regulatory assets, transmission and distribution cost riders, CAMT and other IRA, tax costs rider, securitization.
12/23	2021-00370 Direct	KY	Attorney General Kentucky Industrial Utility Customer, Inc.	Kentucky Power Company	Investigation into adequacy of service and reasonableness of rates.
02/24	Rebuttal				

**Expert Testimony Appearances  
of  
Lane Kollen  
As of January 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
02/24	2023-00008	KY	Attorney General, Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Fuel adjustment clause; fuel and purchased power expense; peaking unit equivalent methodology.
03/24	05-23-001513	TX	Cities Served by CenterPoint Gas	CenterPoint Energy Resources Corp.	Capital structure, Tax Rider, NOL ADIT, CAMT ADIT, annualize revenues, incentive compensation, vendor financing, customer financing, working capital.
05/24	56165	TX	Cities Served by AEP Texas	AEP Texas, Inc.	Tax Rider, NOL ADIT, CAMT ADIT, annualize revenues, incentive compensation, vendor financing, customer financing, working capital.
05/24	U-37071	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, LLC	RFP for solar resources; certification of Mondu PPA.
06/24	Direct in Support of Settlement				
06/24	2024-34-E	SC	Office of Regulatory Staff	Dominion Energy South Carolina, Inc.	Working capital, cash working capital.
06/24	20240026-EI	FL	Office of Public Counsel	Tampa Electric Company	O&M expense, A&G expense, incentive compensation, depreciation rates and expenses, dismantlement expense, tax credits, subsequent year adjustments, tax rider.
06/24	56211	TX	Gulf Coast Coalition of Cities	Centerpoint Energy Houston Electric, LLC	Tax Rider, CAMT ADIT, vendor financing, customer financing, working capital, prepaid pension, regulatory assets, annualize revenues, Texas margin tax.
08/24	5-UR-111	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company	Recovery of retired plant costs; securitization.
09/24	Direct Rebuttal				
09/24	Surrebuttal				
08/24	6690-UR-128	WI	Wisconsin Industrial Energy Group	Wisconsin Public Service Corporation	Recovery of retired plant costs; securitization.
09/24	Direct Rebuttal				
09/24	Surrebuttal				
11/24	2024-00243	KY	Attorney General, Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Bright Mountain Solar renewable energy purchase agreement.
12/24	2024-00285	KY	Attorney General	Duke Energy Kentucky, Inc.	Transition from PJM FRR entity to RPM entity; modifications to Rider Profit Sharing Mechanism.

**EXHIBIT LK-2**

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-33**  
**Page 1 of 1**

**REQUEST:**

Identify and describe 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:**

See Attachment 1 for the organization chart of Atmos Energy Corporation, Inc. ("AEC") and its subsidiaries that are included in the AEC consolidation for federal income tax purpose. Within AEC, there are different divisions set up for different jurisdictions, as well as shared service and call center functions.

**ATTACHMENT:**

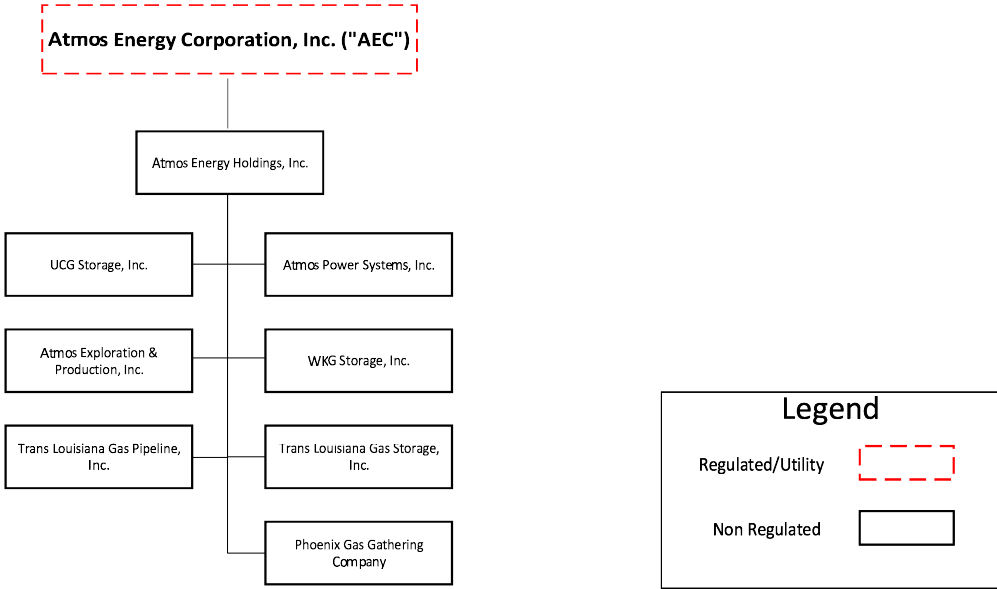
AG\_1-33\_Att1 - Atmos Energy Org Chart.pdf

Respondent: Joel Multer



# Atmos Energy Corporation Inc. & its Subsidiaries Organization Chart

as of September 30 2024



**EXHIBIT LK-3**

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-34**  
**Page 1 of 2**

**REQUEST:**

Provide a schedule showing the history of the taxable income and losses for AEC and each affiliate/subsidiary in total and separated into utility, nonregulated, and other for each month, each quarter, each fiscal year, and each calendar year since January 2021 through the end of the test year in this proceeding. Indicate whether AEC and each affiliate/subsidiary maintain 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:**

See Attachment 1 showing the tax effected cumulative NOL roll forward by utility, non-regulated and other by month, quarter and year.

Refer to the response to AG 1-33 and the associated organization chart. In this organization chart, the Company illustrates the AEC utilities vs. Non-Regulated structure. The utility NOL are generated from AEC and the Non-Regulated NOL are generated from the non regulated entities. The total of pre-tax utility NOL and Non-Regulated NOL tie to the NOL balances the Company filed on its consolidated 1120 Federal Income Tax return.

The NOL -Other is for GAAP purpose and it is to record the federal benefit of a state tax expense reserve due to uncertain tax position ("UTP"). This UTP is regarding Atmos Energy's operation in jurisdictions outside of Kentucky, and it is excluded from Kentucky filing.

Due to the Company's filing structure that all utility operations are in one entity "AEC" for tax filing purpose, the Company has historically allocated the Utility NOL to each of its operational jurisdictions based on the same factors used to allocate general office rate base.

It is not a routine process and practice for the Company to track taxable losses and the related asset NOLADIT due to a single event. There was one exception made during the 2021 KY rate case filing (Case No. 2021-00214), where the Company specifically assigned a portion of the NOL related to one single event, known as Winter Storm Uri. This was due to the fact that this single event resulted in a significant impact on limited jurisdictions outside of Kentucky.

Winter storm Uri posed a unique situation due to the extreme rareness of the event and the extraordinary magnitude of the impact on the NOL. The Company made adjustments to its utility NOL to exclude the Winter Storm Uri impact for jurisdictions that the winter storm did not hit. This incidence of the rare event is not representative of how Atmos Energy tracks temporary differences during its normal course of business.

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-34**  
**Page 2 of 2**

However, in Case No 2021-00214, the Commission considered the Company's historic manner of tracking and allocating NOLC ADIT associated with its regulatory operations to its various operating divisions. Specifically, the Commission ordered that "in future applications to increase base rates, Atmos Kentucky must file a report showing the generation and utilization of NOLC ADIT for Kentucky since this Order based on the expenses incurred and revenue generated from Kentucky operations." Additionally, the Order provided that if Atmos Kentucky proposes to use a different method to reflect the generation and utilization of NOLC ADIT for Kentucky in its revenue model that it needs to explain in detail while using that method would be reasonable. The Company has complied with the Commission's Order in Case No. 2021-00214 as illustrated in Exhibit JJM-1 NOLC Asset Kentucky of Witness Multer's Direct Testimony.

ATTACHMENT:

AG\_1-34\_Att1 - Atmos Monthly NOL.xlsx

Respondent: Joel Multer

Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Rate Division:  
002DIV

Adjustment Description	Category	Adj Code	Fiscal 2021	Fiscal 2021	Fiscal 2021	Fiscal 2021	Fiscal 2021	Fiscal 2021	Fiscal 2021	Fiscal 2021	Fiscal 2021	Fiscal 2021	Fiscal 2022
			1/31/2021	2/28/2021	3/31/2021	4/30/2021	5/31/2021	6/30/2021	7/31/2021	8/31/2021	9/30/2021	10/31/2021	
FD-NOL Credit Carryforward - Non Reg	TAX	TAX02NR	(169,285,085)	(169,285,085)	(170,609,458)	(170,609,458)	(170,609,458)	(170,609,458)	(171,811,030)	(171,811,030)	(171,811,030)	(172,186,819)	(172,186,819)
FD-NOL Credit Carryforward - Utility	TAX	TAX02U	598,045,312	598,045,312	977,066,724	977,066,724	977,066,724	977,066,724	969,847,887	969,847,887	969,847,887	1,015,494,919	1,015,494,919
FD-NOL Credit Carryforward - Other	TAX	TAX02OT	6,660,598	6,660,598	6,660,598	6,660,598	6,660,598	6,660,598	6,660,598	6,660,598	6,660,598	6,886,357	6,886,357

Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Rate Division:  
002DIV

Adjustment Description	Category	Adj Code	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2023
			11/30/2021	12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022	
FD-NOL Credit Carryforward - Non Reg	TAX	TAX02NR	(172,186,819)	(173,898,040)	(173,898,040)	(173,898,040)	(174,734,420)	(174,734,420)	(174,734,420)	(176,055,112)	(176,055,112)	(176,055,112)	(177,504,317)	(177,504,317)	
FD-NOL Credit Carryforward - Utility	TAX	TAX02U	1,015,494,919	1,017,844,563	1,017,844,563	1,017,844,563	606,028,135	606,028,135	606,028,135	573,673,647	573,673,647	573,673,647	610,407,005	610,407,005	
FD-NOL Credit Carryforward - Other	TAX	TAX02OT	6,886,357	6,734,879	6,734,879	6,734,879	6,734,879	6,734,879	6,734,879	6,734,879	6,734,879	6,734,879	8,380,701	8,380,701	

Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Rate Division:  
002DIV

Adjustment Description	Category	Adj Code	Fiscal 2023	Fiscal 2023	Fiscal 2023	Fiscal 2023	Fiscal 2023	Fiscal 2023	Fiscal 2023	Fiscal 2023	Fiscal 2023	Fiscal 2023	Fiscal 2023	Fiscal 2023	Fiscal 2024
			11/30/2022	12/31/2022	1/31/2023	2/28/2023	3/31/2023	4/30/2023	5/31/2023	6/30/2023	7/31/2023	8/31/2023	9/30/2023	10/31/2023	
FD-NOL Credit Carryforward - Non Reg	TAX	TAX02NR	(177,504,317)	(178,972,714)	(178,972,714)	(178,972,714)	(179,951,007)	(179,951,007)	(179,951,007)	(181,392,985)	(181,392,985)	(181,392,985)	(181,392,985)	(182,172,220)	(182,172,220)
FD-NOL Credit Carryforward - Utility	TAX	TAX02U	610,407,005	610,865,223	610,865,223	610,865,223	567,447,871	567,447,871	567,447,871	583,275,066	583,275,066	583,275,066	583,275,066	631,058,684	631,058,684
FD-NOL Credit Carryforward - Other	TAX	TAX02OT	8,380,701	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	9,790,216	9,790,216







Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Rate Division:  
002DIV

Adjustment Description	Category	Adj Code	Fiscal 2026 3/31/2026
FD-NOL Credit Carryforward - Non Reg	TAX	TAX02NR	(186,397,886)
FD-NOL Credit Carryforward - Utility	TAX	TAX02U	577,387,922
FD-NOL Credit Carryforward - Other	TAX	TAX02OT	8,132,211

**EXHIBIT LK-4**

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-40**  
**Page 1 of 2**

**REQUEST:**

Refer to the Excel workbook KY\_ADIT\_-\_EDIT\_Tax\_Update\_June\_2024 provided in response to Staff First Set of Data Requests.

- a. Provide a version of the Excel workbook with all formulas intact in all cells, including references to other worksheets within the workbook and to other worksheets and cells within other Excel workbooks and a copy of each other referenced Excel workbook in live format with all formulas intact.
- b. Refer to tab KY ADIT 2024 filing. Provide a narrative discussion of the purpose of this schedule, the amounts reflected on each line, the source of the amounts reflected on each line and the use of the amounts in the calculation of the ADIT subtracted from rate base in the filing.
- c. Refer to tab ADIT 002. Confirm that positive amounts indicate DTAs and negative amounts indicate DTLs. If this is not correct, then provide a corrected statement and all support relied on for the corrected statement.
- d. Refer to tab ADIT 002 and to rows 47, 48, and 49 that provide the monthly account 190 ADIT amounts for “FD-NOL Credit Carryforward – Non Reg,” “FD-NOL Credit Carryforward – Utility,” and “FD-NOL Credit Carryforward – Other,” respectively. Provide a detailed description of the methodology used to disaggregate or separately determine the actual and projected NOL carryforward amounts for nonregulated utility, and other. Provide a copy of all internal documentation and/or guidelines that document or otherwise address this methodology.
- e. Provide the tax depreciation and book depreciation temporary differences separately for AEC, AEC-NonReg, AEC utility, AEC other, and each AEC utility division for each tax year in which the NOL carryforward from that vintage year remains in the present NOLC in each month of the base year and continuing on through the end of the test year. In addition, provide the allocations of these temporary differences from each division to Division 009 for each of those tax years. Provide all support, including Excel workbooks in live format and with all formulas intact.
- f. Provide the taxable income (loss) for AEC, AEC-NonReg, AEC utility, AEC other, and each division for each tax year in which the NOL carryforward from that vintage year remains in the present NOLC in each month of the base year and continuing on through the end of the tax year, the NOLC balance for each entity/division at the end of each of those tax years by vintage year, the utilization by each entity/division of prior year NOLCs by vintage year in the tax years in which there was taxable income before such utilizations. In addition, provide the allocations of these amounts from each division to Division 009 for each of those tax years. Provide all support, including Excel workbooks in live format and with all formulas intact.
- g. Confirm that only the method and life differences between tax accelerated and straight-line depreciation are relevant in the determination of whether there is a normalization violation for failure to include some or all of the NOLC DTA in rate base. Explain your response and provide all support relied on for your response.

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-40**  
**Page 2 of 2**

- h. Provide a narrative description of how AEC calculates or will calculate the minimum NOLC DTA that must be included in the AEC Kentucky rate base in the base year and in the test year in this proceeding in order to avoid a normalization violation.
- i. Provide a calculation of the minimum NOLC DTA that must be included in the AEC Kentucky rate base in the base year and in the test year in this proceeding in order to avoid a normalization violation. Provide the calculations in an Excel workbook in live format with all formulas intact.

**RESPONSE:**

- a. The Excel file "KY\_ADIT\_-\_EDIT\_Tax\_Update\_June\_2024.xlsx" contains all tabs and formulas within the workbook to support the calculation on tab "KY ADIT 2024 filing", which provides a summary of book vs. tax differences with fully forward looking calculations till period ending March 2026.
- b. See the response to subpart (a).
- c. Confirmed.
- d. The actual NOL amount as of June 30, 2024 is based on the Company's provision calculation as described in the response to AG 1-39. The Company did not make further NOL projection in the ADIT 002 tab, and the balances as of June 30, 2024 are carried through the tested period. The NOLs in ADIT 002 is not used in this filing. Refer to the response to AG 1-34 for further information.
- e. The Company does not have the vintage data readily available. To provide the vintage data would require the Company to overhaul and reconfigure its Plant tax application and process.
- f. See the response to subpart (e).
- g. See the response to AG 1-38.
- h. See the responses to AG 1-34 and 1-38. For the Test Period, the Company made an adjustment at the bottom of Schedule B.5.F, consistent with the methodology used in previous cases, to properly synchronize ADIT included in rate base, tax expense and depreciation expense.
- i. See the responses to AG 1-34, 1-38 and the response to subpart (h).

Respondent: Joel Multer

**EXHIBIT LK-5**

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 2**  
**Question No. 2-09**  
**Page 1 of 2**

**REQUEST:**

Refer to Witness Multer's Direct Testimony in Case No. 2023-00231, at 6-7, wherein he states: "Based on Internal Revenue Code ("IRC") section 168(f)(2), 168(i)(9) and 1.167(l)-1, decreasing taxpayer's rate base by the full amount of its ADIT account balance without reducing it by the taxpayer's NOLC-related account balance would be a violation of the normalization rules. . . Accelerated tax depreciation is subject to the IRC normalization provisions. . . Cumulative NOLC [net operating loss carryforward] which is the result of accelerated depreciation is likewise subject to normalization rules. . . Determination of NOLC attributable to accelerated depreciation must be determined using a last dollar deducted methodology."

- a. Confirm that a more accurate and complete statement would be "Based on Internal Revenue Code ("IRC") section 168(f)(2), 168(i)(9) and 1.167(l)-1, decreasing taxpayer's rate base by the full amount of its ADIT account balance without reducing it by the taxpayer's NOLC-related account balance resulting from accelerated tax depreciation in excess of straight-line tax depreciation would be a violation of the normalization rules." If denied, then provide all authoritative support relied on for your position.
- b. Confirm that a more accurate and complete statement would be "Accelerated tax depreciation in excess of straight line tax depreciation is subject to the normalization provisions . . . Cumulative NOLC [net operating loss carryforward] which is the result of accelerated tax depreciation in excess of straight line tax depreciation is likewise subject to normalization rules . . . Determination of NOLC attributable to accelerated depreciation in excess of straight line tax depreciation must be determined using a last dollar deducted methodology." If denied, then provide all authoritative support relied on for your position.
- c. Confirm that the DTL due to accelerated depreciation is based solely on method/life temporary differences using the same tax basis for both the accelerated tax depreciation and straight-line tax depreciation calculations and is equal to accelerated tax depreciation less straight-line tax depreciation times the income tax rate. If denied, then provide all authoritative support for your position.
- d. Refer to part (c) of this question. Confirm that the DTL is not simply the accelerated tax depreciation times the income tax rate. If denied, then provide all authoritative support relied on for your position.

**RESPONSE:**

- a. Confirmed with clarification. Based on Internal Revenue Code ("IRC") section 168(f)(2), 168(i)(9) and 1.167(l)-1, decreasing taxpayer's rate base by the full amount of its ADIT account balance without reducing it by the taxpayer's NOLC-related account balance resulting from accelerated tax depreciation in excess of *book depreciation used for regulatory purposes in cost of service* would be a violation of the normalization rules."

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 2**  
**Question No. 2-09**  
**Page 2 of 2**

- b. The Company confirms each statement with the following clarifications, see also excerpt of IRC Sec. 168(i)(9)(A).

*Accelerated tax depreciation in excess of book depreciation used for regulatory purposes in cost of service* is subject to the normalization provisions.

Cumulative NOLC [net operating loss carryforward] which is the result of accelerated tax depreciation *in excess of book depreciation used for regulatory purposes* is likewise subject to the normalization rules.

The determination of NOLC attributable to accelerated depreciation *in excess of book depreciation used for regulatory purposes* must be determined using a last dollar deducted methodology.

IRC Sec. 168(i)(9)(A) In general. In order to use a normalization method of accounting with respect to any public utility property –

- (i) the taxpayer must, in computing its tax expense for purposes of establishing its cost of service for ratemaking purposes and reflecting operating results in its regulated books of account, use a method of depreciation with respect to such property that is the same as, and a depreciation period for such property that is no shorter than, the method and period used to compute its depreciation expense for such purposes; and
- (ii) if the amount allowable as a deduction under this section with respect to such property differs from the amount that would be allowable as a deduction under section 167 using the method (including the period, first and last year convention, and salvage value) used to compute regulated tax expense under clause (i), the taxpayer must make adjustments to a reserve to reflect the deferral of taxes resulting from such difference.

- c. Refer to the response to subpart (b).

- d. Confirmed.

Respondent: Joel Multer



**EXHIBIT LK-6**

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**Staff DR Set No. 3**  
**Question No. 3-04**  
**Page 1 of 1**

**REQUEST:**

Refer to Testimony of Joel J. Multer (Multer Direct Testimony), pages 3–4, and Exhibit JJM-1.

- a. Provide an update to Exhibit JJM-1 in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible through the most current month for which information is available.
- b. Provide work papers in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible, with updates through the most current month for which information is available, showing the calculation of “Pre Tax Book Income” in each fiscal year (FY) reflected in Exhibit JJM-1.
- c. Provide workpapers in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible showing the monthly accumulated deferred income tax (ADIT) balances associated with all of the ADIT balances reflected on page two of Exhibit JJM-1, including adjustments to the balances, beginning in the month prior to FY 2022 through the most current month for which information is available, and include in such work papers the calculation of such ADIT balances and changes thereto from book/tax timing differences in each month.

**RESPONSE:**

- a. See Attachment 1.
- b. See Attachment 2.
- c. See Attachment 1.

**ATTACHMENTS:**

Staff\_3-04\_Att1 - NOLC DTA Update Through 9-30-2024.xlsx  
Staff\_3-04\_Att2 - Div 009 Income Statements.xlsx

Respondent: Joel Multer

	FY 2022	FY 2023	As of 6/30/2024 FY 2024	July - Sept FY 2024	As of 9/30/2024 Total FY 2024
<b>DIV 09 Pre Tax Book Income</b>	<b>27,826,385</b>	<b>32,545,724</b>	<b>30,045,584</b>	<b>122,150</b>	<b>30,167,734</b>
<b>DIV 09</b> Federal Taxable Income (Loss) from Book/Tax Differences	(51,090,545)	(8,033,323)	(21,012,802)	2,303,078	(18,709,723)
<b>DIV 02</b> Federal Taxable Income (Loss) from Book/Tax Differences	(18,026,132)	(9,024,826)	(108,093)	3,961,381	3,853,288
<b>DIV 012</b> Federal Taxable Income (Loss) from Book/Tax Differences	155,935	433,981	290,790	(206,779)	84,011
<b>DIV 091</b> Federal Taxable Income (Loss) from Book/Tax Differences	<u>2,362,331</u>	<u>(4,907,832)</u>	<u>(8,629,366)</u>	<u>(2,397,230)</u>	<u>(11,026,597)</u>
Regulatory Federal Taxable Income (Loss)	(38,772,027)	11,013,723	586,113	3,782,600	4,368,713
Federal Tax Rate	<u>21.00%</u>	<u>21.00%</u>	<u>21.00%</u>	<u>21.00%</u>	<u>21.00%</u>
<b>Increase / (Decrease) in NOLC ADIT Asset</b>	<b>8,142,126</b>	<b>(2,312,882)</b>	<b>(123,084)</b>	<b>(794,346)</b>	<b>(917,430)</b>
<b>NOLC ADIT Beginning of Year</b>	<b>28,552,909</b> <sup>A</sup>	<b>36,695,035</b>	<b>34,382,153</b>	<b>34,259,069</b>	<b>34,382,153</b>
<b>Increase / (Decrease) in NOLC ADIT Asset</b>	<u><b>8,142,126</b></u>	<u><b>(2,312,882)</b></u>	<u><b>(123,084)</b></u>	<u><b>(794,346)</b></u>	<u><b>(917,430)</b></u>
<b>NOLC ADIT End of Year</b>	<u><b>36,695,035</b></u>	<u><b>34,382,153</b></u>	<u><b>34,259,069</b></u>	<u><b>33,464,723</b></u>	<u><b>33,464,723</b></u>

<sup>A</sup> - NOLADIT as of 9/30/2021 - End of Base Period in Case No. 2021-00214

	FY 2022	FY 2023	As of 6/30/2024 FY 2024	July - Sept FY 2024	As of 9/30/2024 Total FY 2024
<b>DIV 09</b>					
Pre Tax Book Income	27,826,385	32,545,724	30,045,584	122,150	30,167,734
ADIT Beginning of Year	(97,066,594)	(120,107,365)	(119,965,923)	(126,931,020)	(119,965,923)
Less Items Excluded from Rate Base	(1,439,654)	(5,485,739)	(1,437,843)	(1,011,179)	(1,437,843)
Less State Only Items	11,070,567	5,705,377	5,782,479	5,117,842	5,782,479
Less TCJA Regulatory Liability related ADIT	7,021,267	6,138,862	4,159,620	2,675,190	4,159,620
Adjusted ADIT Beginning of Year	(113,718,774)	(126,465,865)	(128,470,179)	(133,712,873)	(128,470,179)
ADIT End of Year	(120,107,365)	(119,965,923)	(126,931,020)	(125,813,250)	(125,813,250)
Less Items Excluded from Rate Base	(5,485,739)	(1,437,843)	(1,011,179)	(415,201)	(415,201)
Less State Only Items	5,705,377	5,782,479	5,117,842	5,559,682	5,559,682
Less TCJA Regulatory Liability related ADIT	6,138,862	4,159,620	2,675,190	2,180,524	2,180,524
Adjusted ADIT End of Year	(126,465,865)	(128,470,179)	(133,712,873)	(133,138,255)	(133,138,255)
Change in Adjusted ADIT	(12,747,091)	(2,004,314)	(5,242,694)	574,618	(4,688,076)
Applicable Federal & State Deferred Tax Rate	24.9500%	24.9500%	24.9500%	24.9500%	24.9500%
Kentucky Mid States Div Allocation	100.00%	100.00%	100.00%	100.00%	100.00%
Kentucky Jurisdiction Allocation	100.00%	100.00%	100.00%	100.00%	100.00%
<b>Federal Taxable Income (Loss) from Book/Tax Differences</b>	<b>(51,090,545)</b>	<b>(8,033,323)</b>	<b>(21,012,802)</b>	<b>2,303,078</b>	<b>(18,769,723)</b>
<b>DIV 02</b>					
ADIT Beginning of Year	841,973,871	342,022,601	314,468,054	252,997,116	314,468,054
Less Items Excluded from Rate Base	35,796,993	25,188,290	21,428,201	19,995,420	21,428,201
Less State Only Items	1,910,422	2,780,160	2,296,070	2,299,863	2,296,070
Less TCJA Regulatory Liability related ADIT	-	-	-	-	-
Less Federal NOL	850,194,457	441,283,389	458,676,680	399,122,247	458,676,680
Adjusted ADIT Beginning of Year	(45,928,001)	(127,229,238)	(167,932,897)	(168,420,414)	(167,932,897)
ADIT End of Year	342,022,601	314,468,054	252,997,116	311,818,167	311,818,167
Less Items Excluded from Rate Base	25,188,290	21,428,201	19,995,420	17,982,623	17,982,623
Less State Only Items	2,780,160	2,296,070	2,299,863	2,475,651	2,475,651
Less TCJA Regulatory Liability related ADIT	-	-	-	-	-
Less Federal NOL	441,283,389	458,676,680	399,122,247	441,913,339	441,913,339
Adjusted ADIT End of Year	(127,229,238)	(167,932,897)	(168,420,414)	(150,553,846)	(150,553,846)
Change in Adjusted ADIT	(81,301,236)	(40,703,659)	(487,517)	17,866,569	17,379,051
Applicable Federal & State Deferred Tax Rate	22.4220%	22.4220%	22.4220%	22.4220%	22.4220%
Kentucky Mid States Div Allocation	9.86%	9.86%	9.86%	9.86%	9.86%
Kentucky Jurisdiction Allocation	50.42%	50.42%	50.42%	50.42%	50.42%
<b>Federal Taxable Income (Loss) from Book/Tax Differences</b>	<b>(18,026,132)</b>	<b>(9,024,829)</b>	<b>(108,093)</b>	<b>3,961,381</b>	<b>3,853,288</b>
<b>DIV 012</b>					
ADIT Beginning of Year	(15,341,523)	(14,387,639)	(11,822,885)	(10,661,552)	(11,822,885)
Less Items Excluded from Rate Base	(1,166,404)	(841,660)	(27,859)	(39,651)	(27,859)
Less State Only Items	-	-	-	-	-
Less TCJA Regulatory Liability related ADIT	-	-	-	-	-
Adjusted ADIT Beginning of Year	(14,175,119)	(13,545,979)	(11,795,026)	(10,621,901)	(11,795,026)
ADIT End of Year	(14,387,639)	(11,822,885)	(10,661,552)	(10,383,728)	(10,383,728)
Less Items Excluded from Rate Base	(841,660)	(27,859)	(39,651)	1,072,375	1,072,375
Less State Only Items	-	-	-	-	-
Less TCJA Regulatory Liability related ADIT	-	-	-	-	-
Adjusted ADIT End of Year	(13,545,979)	(11,795,026)	(10,621,901)	(11,456,103)	(11,456,103)
Change in Adjusted ADIT	629,140	1,750,953	1,173,125	(834,202)	338,923
Applicable Federal & State Deferred Tax Rate	22.42%	22.42%	22.42%	22.42%	22.42%
Kentucky Mid States Div Allocation	11.02%	11.02%	11.02%	11.02%	11.02%
Kentucky Jurisdiction Allocation	50.42%	50.42%	50.42%	50.42%	50.42%
<b>Federal Taxable Income (Loss) from Book/Tax Differences</b>	<b>155,935</b>	<b>433,981</b>	<b>290,790</b>	<b>(206,779)</b>	<b>84,011</b>
<b>DIV 091</b>					
ADIT Beginning of Year	(3,474,544)	(2,438,663)	(4,559,829)	(8,390,118)	(4,559,829)
Less Items Excluded from Rate Base	1,222,305	1,207,647	1,269,016	1,276,245	1,269,016
Less State Only Items	-	-	-	-	-
Less TCJA Regulatory Liability related ADIT	-	-	-	-	-
Adjusted ADIT Beginning of Year	(4,696,849)	(3,646,310)	(5,828,845)	(9,666,363)	(5,828,845)
ADIT End of Year	(2,438,663)	(4,559,829)	(8,390,118)	(9,326,201)	(9,326,201)
Less Items Excluded from Rate Base	1,207,647	1,269,016	1,276,245	1,406,221	1,406,221
Less State Only Items	-	-	-	-	-
Less TCJA Regulatory Liability related ADIT	-	-	-	-	-
Adjusted ADIT End of Year	(3,646,310)	(5,828,845)	(9,666,363)	(10,732,422)	(10,732,422)
Change in Adjusted ADIT	1,050,539	(2,182,535)	(3,837,518)	(1,066,059)	(4,903,577)
Applicable Federal & State Deferred Tax Rate	22.42%	22.42%	22.42%	22.42%	22.42%
Kentucky Mid States Div Allocation	100.00%	100.00%	100.00%	100.00%	100.00%
Kentucky Jurisdiction Allocation	50.42%	50.42%	50.42%	50.42%	50.42%
<b>Federal Taxable Income (Loss) from Book/Tax Differences</b>	<b>2,362,331</b>	<b>(4,907,832)</b>	<b>(8,629,366)</b>	<b>(2,397,230)</b>	<b>(11,026,597)</b>
<b>Regulatory Federal Taxable Income (Loss)</b>	<b>(38,772,027)</b>	<b>11,013,723</b>	<b>586,113</b>	<b>3,782,600</b>	<b>4,368,713</b>
<b>Federal Tax Rate</b>	<b>21.00%</b>	<b>21.00%</b>	<b>21.00%</b>	<b>21.00%</b>	<b>21.00%</b>
<b>Increase / (Decrease) in NOLC ADIT Asset</b>	<b>8,142,126</b>	<b>(2,312,882)</b>	<b>(123,084)</b>	<b>(794,346)</b>	<b>(917,430)</b>

Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Category	Adj Code	Fiscal 2021 9/30/2021	Fiscal 2022 10/31/2021	Fiscal 2022 11/30/2021	Fiscal 2022 12/31/2021	Fiscal 2022 1/31/2022	Fiscal 2022 2/28/2022	Fiscal 2022 3/31/2022	Fiscal 2022 4/30/2022	Fiscal 2022 5/31/2022	Fiscal 2022 6/30/2022	Fiscal 2022 7/31/2022
Environmental Activities	ACC	ACC01											
Ad Valorem Taxes	ACC	ACC02											
Directors Deferred Bonus	ACC	ACC03											
MIP/VPP Accrual	Excl ACC	ACC04	(248,888)	(248,888)	(248,888)	(249,043)	(249,043)	(249,043)	(249,197)	(249,197)	(249,197)	(249,352)	(249,352)
Accrued Environmental Asset	ACC	ACC05											
Miscellaneous Accrued	ACC	ACC06											
Self Insurance - Adjustment	ACC	ACC08											
Vacation Accrual	ACC	ACC11	(72,129)	(72,129)	(72,129)	(72,129)	(72,129)	(72,129)	(72,129)	(72,129)	(72,129)	(72,129)	(72,129)
Worker's Comp Insurance Reserve	ACC	ACC12	117,791	117,791	117,791	120,851	120,851	120,851	126,540	126,540	126,540	131,190	131,190
<b>Accrual - Subtotal</b>			<b>(203,226)</b>	<b>(203,226)</b>	<b>(203,226)</b>	<b>(200,321)</b>	<b>(200,321)</b>	<b>(200,321)</b>	<b>(194,786)</b>	<b>(194,786)</b>	<b>(194,786)</b>	<b>(190,291)</b>	<b>(190,291)</b>
Rabbi Trust - True Up	BEN	NBP01											
SEBP Adjustment	BEN	NBP03											
SERP DTL Offset	BEN	NBP04											
Restricted Stock Grant Plan	BEN	NBP05											
Rabbi Trust	BEN	NBP06											
VEBA Trust Contribution Adjustment	BEN	NBP08											
Restricted Stock - MIP	BEN	NBP13											
Director's Stock Awards	BEN	NBP16											
Director's Stock - Temp	BEN	NBP18											
Rabbi Trust Book Gain or Loss	BEN	NBP22											
Rabbi Trust Tax Gain or Loss	BEN	NBP23											
Rabbi Trust Unrealized Gain or Loss	BEN	NBP24											
Pension Expense	BEN	PEN01											
FAS106 Adjustment	BEN	PRB01	-	-	-	-	-	-	-	-	-	-	-
<b>Benefits - Subtotal</b>													
CWIP	Excl CWIP/RWIP	FXA26	(79,453)	(79,453)	(79,453)	(79,453)	(79,453)	(79,453)	(79,453)	(79,453)	(79,453)	(79,453)	(79,453)
RWIP	Excl CWIP/RWIP	FXA47	(54,610)	(54,610)	(54,610)	(54,610)	(54,610)	(54,610)	(54,610)	(54,610)	(54,610)	(54,610)	(54,610)
<b>CWIP/RWIP - Subtotal</b>			<b>(134,063)</b>	<b>(134,063)</b>	<b>(134,063)</b>	<b>(134,063)</b>	<b>(134,063)</b>	<b>(134,063)</b>	<b>(134,063)</b>	<b>(134,063)</b>	<b>(134,063)</b>	<b>(134,063)</b>	<b>(134,063)</b>
Fixed Asset Cost Adjustment	FXA	FXA01	(93,738,475)	(93,738,475)	(93,738,475)	(95,856,080)	(95,856,080)	(95,856,080)	(99,259,385)	(99,259,385)	(99,259,385)	(100,037,852)	(100,037,852)
Depreciation Adjustment	FXA	FXA02	(23,051,260)	(23,051,260)	(23,051,260)	(23,417,178)	(23,417,178)	(23,417,178)	(23,787,850)	(23,787,850)	(23,787,850)	(24,031,299)	(24,031,299)
Book Gain/Loss on Sale of Fixed Assets	FXA	FXA03	-	-	-	-	-	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	FXA	FXA04	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Cushion Gas	FXA	FXA13	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Line Pack Gas	FXA	FXA14	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Cost	FXA	FXA15	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Accum	FXA	FXA16	-	-	-	-	-	-	-	-	-	-	-
Repair % Completion Allowance	FXA	FXA41	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) TPR	FXA	FXA46	-	-	-	-	-	-	-	-	-	-	-
Repairs Aggregation Sec 481(a) Adj	FXA	FXA50	-	-	-	-	-	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj	FXA	FXA80	-	-	-	(26,660)	(26,660)	(26,660)	(88,910)	(88,910)	(88,910)	(173,800)	(173,800)
<b>Plant - Subtotal</b>			<b>(116,789,735)</b>	<b>(116,789,735)</b>	<b>(116,789,735)</b>	<b>(119,299,918)</b>	<b>(119,299,918)</b>	<b>(119,299,918)</b>	<b>(123,136,145)</b>	<b>(123,136,145)</b>	<b>(123,136,145)</b>	<b>(124,242,951)</b>	<b>(124,242,951)</b>
Deferred Gas Costs	Excl GCA	GCA01	(895,760)	(895,760)	(895,760)	(2,986,611)	(2,986,611)	(2,986,611)	(1,435,225)	(1,435,225)	(1,435,225)	(2,515,491)	(2,515,491)
Over Recoveries of PGA	Excl GCA	GCA03	(714,552)	(714,552)	(714,552)	(642,814)	(642,814)	(642,814)	(2,393,468)	(2,393,468)	(2,393,468)	-	-
PGA - Amended Item	GCA	GCA04	-	-	-	-	-	-	-	-	-	-	-
<b>Gas Cost Adjustment - Subtotal</b>			<b>(1,610,312)</b>	<b>(1,610,312)</b>	<b>(1,610,312)</b>	<b>(3,629,425)</b>	<b>(3,629,425)</b>	<b>(3,629,425)</b>	<b>(3,828,693)</b>	<b>(3,828,693)</b>	<b>(3,828,693)</b>	<b>(2,515,491)</b>	<b>(2,515,491)</b>
LGS - Goodwill Amortization	GDW	ONT13	-	-	-	-	-	-	-	-	-	-	-
TXU - Goodwill Amortization	GDW	ONT49	-	-	-	-	-	-	-	-	-	-	-
<b>Goodwill - Subtotal</b>													
Customer Advances	ONT	CAP01	233,412	233,412	233,412	204,852	204,852	204,852	200,613	200,613	200,613	196,043	196,043
Capital Loss CarryForward	ONT	CAP_LOSS_CF	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-13523	ONT	DTE01	-	-	-	-	-	-	-	-	-	-	-
Deferred Expense Projects	ONT	DTE09	(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	ONT	DTE12	-	-	-	-	-	-	-	-	-	-	-
Deferred Projects - TXU Acquisition	ONT	DTE14	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Amortized	ONT	DVA05	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Capitalized	ONT	DVA06	-	-	-	-	-	-	-	-	-	-	-
Leases - Assets	ONT	DVA10	(4,155,415)	(4,155,415)	(4,155,415)	(4,065,299)	(4,065,299)	(4,065,299)	(4,086,023)	(4,086,023)	(4,086,023)	(4,110,084)	(4,110,084)
DIG on Fixed Assets	ONT	DVA16	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	ONT	DVA18	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - WKG	ONT	DVA19	-	-	-	-	-	-	-	-	-	-	-
Leases - Liabilities	ONT	DVA20	4,155,415	4,155,415	4,155,415	4,065,299	4,065,299	4,065,299	4,086,023	4,086,023	4,086,023	4,110,084	4,110,084



**AFFIDAVIT**

STATE OF GEORGIA )

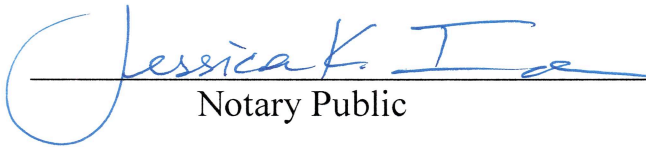
COUNTY OF FULTON )

LANE KOLLEN, being duly sworn, deposes and states: that the attached is his sworn testimony and that the statements contained are true and correct to the best of his knowledge, information and belief.



Lane Kollen

Sworn to and subscribed before me on this  
27th day of January 2025.



Notary Public

Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027

Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Category	Adj Code	Fiscal 2021	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022
			9/30/2021	10/31/2021	11/30/2021	12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	
<b>Other - Subtotal</b>			<b>10,600,175</b>	<b>10,572,343</b>	<b>10,544,510</b>	<b>10,724,752</b>	<b>10,696,920</b>	<b>10,669,087</b>	<b>10,344,473</b>	<b>10,316,641</b>	<b>10,288,808</b>	<b>11,924,387</b>	<b>11,759,450</b>	
FD-NOL Credit Carryforward - Non Reg	fed nol	TAX												
FD-NOL Credit Carryforward - Utility	fed nol	TAX												
FD-NOL Credit Carryforward - Other	fed nol	TAX												
ST-State Net Operating Loss	state	TAX	9,947,978	9,947,978	9,947,978	9,938,726	9,938,726	9,938,726	4,421,100	4,421,100	4,421,100	3,858,497	3,858,497	
ST-State Bonus Depreciation	state	TAX	4,065,397	4,065,397	4,065,397	4,065,397	4,065,397	4,065,397	4,065,397	4,065,397	4,065,397	4,065,397	4,065,397	
FD-FAS 115 Adjustment		TAX												
FD-Treasury Lock Adjustment		TAX												
FD-Other		TAX												
FD-Federal Benefit on State Bonus	state	TAX	(853,733)	(853,733)	(853,733)	(853,733)	(853,733)	(853,733)	(853,733)	(853,733)	(853,733)	(853,733)	(853,733)	
FD-Federal Benefit on State NOL	state	TAX	(2,089,075)	(2,089,075)	(2,089,075)	(2,087,132)	(2,087,132)	(2,087,132)	(928,431)	(928,431)	(928,431)	(810,284)	(810,284)	
FD-Fuel Cell Credit		TAX												
State Texas Margin WWE DTL		TAX												
ST-Other		TAX												
ST - Valuation Allow on State NOL		TAX												
FD - Valuation on Fed Tax of St NO		TAX												
FD-FAS 158 Measurement Date Change		TAX												
FD-AMT Minimum Tax Credit		TAX												
ST- Valuation Allow Enterprise Zone ITC		TAX												
FD- Valuation Allow Fed Tax Enterprise Zone ITC		TAX												
ST-Enterprise Zone ITC		TAX	-	-	-	-	-	-	-	-	-	-	-	
STATE NOL_FIN48	state	TAX												
STATE NOL_FIN48 TN		TAX												
FD-Treasury Lock Adjustment-Realized		TAX	-	-	-	-	-	-	-	-	-	-	-	
FD-Treasury Lock Adjustment-Unrealized		TAX	-	-	-	-	-	-	-	-	-	-	-	
FD -Federal Tax on Enterprise ITC		TAX	-	-	-	-	-	-	-	-	-	-	-	
<b>Other Tax Effected Items - Subtotal</b>			<b>11,070,567</b>	<b>11,070,567</b>	<b>11,070,567</b>	<b>11,063,258</b>	<b>11,063,258</b>	<b>11,063,258</b>	<b>6,704,333</b>	<b>6,704,333</b>	<b>6,704,333</b>	<b>6,259,877</b>	<b>6,259,877</b>	
<b>Total Accumulated Deferred Income Tax</b>			<b>(97,066,594)</b>	<b>(97,094,426)</b>	<b>(97,122,259)</b>	<b>(101,475,717)</b>	<b>(101,503,549)</b>	<b>(101,531,382)</b>	<b>(110,244,881)</b>	<b>(110,272,713)</b>	<b>(110,300,546)</b>	<b>(108,898,532)</b>	<b>(109,063,469)</b>	

Excluded (1,439,654)  
State Only 11,070,567  
TCJA Reg Liab Related 7,021,267  
Fed NOL -  
(113,718,774.00)



Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Fiscal 2022 8/31/2022	Fiscal 2022 9/30/2022	Fiscal 2023 10/31/2022	Fiscal 2023 11/30/2022	Fiscal 2023 12/31/2022	Fiscal 2023 1/31/2023	Fiscal 2023 2/28/2023	Fiscal 2023 3/31/2023	Fiscal 2023 4/30/2023	Fiscal 2023 5/31/2023	Fiscal 2023 6/30/2023	Fiscal 2023 7/31/2023	Fiscal 2023 8/31/2023	Fiscal 2023 9/30/2023	Fiscal 2024 10/31/2023	Fiscal 2024 11/30/2023
Environmental Activities																
Ad Valorem Taxes																
Directors Deferred Bonus																
MIP/VPP Accrual	(249,352)	(296,676)	(296,676)	(296,676)	(296,638)	(296,638)	(296,638)	(296,601)	(296,601)	(296,601)	(296,563)	(296,563)	(296,563)	(253,480)	(253,480)	(253,480)
Accrued Environmental Asset																
Miscellaneous Accrued																
Self Insurance - Adjustment																
Vacation Accrual	(72,129)	(66,331)	(66,331)	(66,331)	(66,331)	(66,331)	(66,331)	(66,331)	(66,331)	(66,331)	(66,331)	(66,331)	(66,331)	(67,490)	(67,490)	(67,490)
Worker's Comp Insurance Reserve	131,190	138,263	138,263	138,263	141,339	141,339	141,339	146,279	146,279	146,279	150,448	150,448	150,448	157,105	157,105	157,105
<b>Accrual - Subtotal</b>	<b>(190,291)</b>	<b>(224,744)</b>	<b>(224,744)</b>	<b>(224,744)</b>	<b>(221,630)</b>	<b>(221,630)</b>	<b>(221,630)</b>	<b>(216,653)</b>	<b>(216,653)</b>	<b>(216,653)</b>	<b>(212,446)</b>	<b>(212,446)</b>	<b>(212,446)</b>	<b>(163,865)</b>	<b>(163,865)</b>	<b>(163,865)</b>
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																
Rabbi Trust Book Gain or Loss																
Rabbi Trust Tax Gain or Loss																
Rabbi Trust Unrealized Gain or Loss																
Pension Expense																
FAS106 Adjustment	-	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736
<b>Benefits - Subtotal</b>	<b>-</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>
CWIP	(79,453)	(96,103)	(96,103)	(96,103)	(96,103)	(96,103)	(96,103)	(96,103)	(96,103)	(96,103)	(96,103)	(96,103)	(96,103)	(81,088)	(81,088)	(81,088)
RWIP	(54,610)	(43,127)	(43,127)	(43,127)	(43,127)	(43,127)	(43,127)	(43,127)	(43,127)	(43,127)	(43,127)	(43,127)	(43,127)	(52,369)	(52,369)	(52,369)
<b>CWIP/RWIP - Subtotal</b>	<b>(134,063)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(139,230)</b>	<b>(133,457)</b>	<b>(133,457)</b>	<b>(133,457)</b>
Fixed Asset Cost Adjustment	(100,037,852)	(103,748,559)	(103,748,559)	(103,748,559)	(106,742,671)	(106,742,671)	(106,742,671)	(109,399,745)	(109,399,745)	(109,399,745)	(109,373,523)	(109,373,523)	(109,373,523)	(98,904,501)	(98,904,501)	(98,904,501)
Depreciation Adjustment	(24,031,299)	(25,975,181)	(25,975,181)	(25,975,181)	(25,976,862)	(25,976,862)	(25,976,862)	(25,977,947)	(25,977,947)	(25,977,947)	(26,414,187)	(26,414,187)	(26,414,187)	(32,555,781)	(32,555,781)	(32,555,781)
Book Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Cushion Gas	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Line Pack Gas	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Cost	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Accum	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repair % Completion Allowance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) TPR	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repairs Aggregation Sec 481(a) Adj	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj	(173,800)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Plant - Subtotal</b>	<b>(124,242,951)</b>	<b>(129,723,740)</b>	<b>(129,723,740)</b>	<b>(129,723,740)</b>	<b>(132,719,533)</b>	<b>(132,719,533)</b>	<b>(132,719,533)</b>	<b>(135,377,692)</b>	<b>(135,377,692)</b>	<b>(135,377,692)</b>	<b>(135,787,710)</b>	<b>(135,787,710)</b>	<b>(135,787,710)</b>	<b>(131,460,282)</b>	<b>(131,460,282)</b>	<b>(131,460,282)</b>
Deferred Gas Costs	(2,515,491)	(5,619,177)	(5,619,177)	(5,619,177)	(6,911,117)	(6,911,117)	(6,911,117)	(3,066,716)	(3,066,716)	(3,066,716)	991,766	991,766	991,766	3,159,397	3,159,397	3,159,397
Over Recoveries of PGA	-	-	-	-	-	-	-	(1,855,612)	(1,855,612)	(1,855,612)	(3,852,553)	(3,852,553)	(3,852,553)	(5,105,649)	(5,105,649)	(5,105,649)
PGA - Amended Item	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0
<b>Gas Cost Adjustment - Subtotal</b>	<b>(2,515,491)</b>	<b>(5,619,177)</b>	<b>(5,619,177)</b>	<b>(5,619,177)</b>	<b>(6,911,117)</b>	<b>(6,911,117)</b>	<b>(6,911,117)</b>	<b>(4,922,328)</b>	<b>(4,922,328)</b>	<b>(4,922,328)</b>	<b>(2,860,787)</b>	<b>(2,860,787)</b>	<b>(2,860,787)</b>	<b>(1,946,252)</b>	<b>(1,946,252)</b>	<b>(1,946,252)</b>
LGS - Goodwill Amortization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TXU - Goodwill Amortization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Goodwill - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Customer Advances	196,043	194,564	194,564	194,564	193,205	193,205	193,205	188,553	188,553	188,553	188,553	188,553	188,553	183,666	183,666	183,666
Capital Loss CarryForward	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-13523	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Expense Projects	(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)	(8,918)	(8,918)	(8,918)
Amortization - LGS Acq. 1810-14155	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Projects - TXU Acquisition	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Amortized	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Capitalized	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Assets	(4,110,084)	(4,005,865)	(4,005,865)	(4,005,865)	(3,904,043)	(3,904,043)	(3,904,043)	(3,820,561)	(3,820,561)	(3,820,561)	(3,707,257)	(3,707,257)	(3,707,257)	(3,612,666)	(3,612,666)	(3,612,666)
DIG on Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - WKG	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Liabilities	4,110,084	4,005,865	4,005,865	4,005,865	3,904,043	3,904,043	3,904,043	3,820,561	3,820,561	3,820,561	3,707,257	3,707,257	3,707,257	3,612,666	3,612,666	3,612,666





**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024
	12/31/2023	1/31/2024	2/29/2024	3/31/2024	4/30/2024	5/31/2024	6/30/2024	6/30/2024	7/31/2024	8/31/2024	9/30/2024	9/30/2024
Environmental Activities	-	-	-	-	-	-	-	-	-	-	-	-
Ad Valorem Taxes	-	-	-	-	-	-	-	-	-	-	-	-
Directors Deferred Bonus	-	-	-	-	-	-	-	-	-	-	-	-
MIP/VPP Accrual	(252,751)	(252,751)	(252,751)	(252,021)	(252,021)	(252,021)	(251,292)	(251,292)	(251,292)	(251,292)	(251,109)	(251,109)
Accrued Environmental Asset	-	-	-	-	-	-	-	-	-	-	-	-
Miscellaneous Accrued	-	-	-	-	-	-	-	-	-	-	-	-
Self Insurance - Adjustment	-	-	-	-	-	-	-	-	-	-	-	-
Vacation Accrual	(67,490)	(67,490)	(67,490)	(67,490)	(67,490)	(67,490)	(67,490)	(67,490)	(67,490)	(67,490)	(66,998)	(66,998)
Worker's Comp Insurance Reserve	159,774	159,774	159,774	163,840	163,840	163,840	167,938	167,938	167,938	167,938	172,845	172,845
<b>Accrual - Subtotal</b>	<b>(160,467)</b>	<b>(160,467)</b>	<b>(160,467)</b>	<b>(155,671)</b>	<b>(155,671)</b>	<b>(155,671)</b>	<b>(150,844)</b>	<b>(150,844)</b>	<b>(150,844)</b>	<b>(150,844)</b>	<b>(145,262)</b>	<b>(145,262)</b>
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	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Book Gain or Loss	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Tax Gain or Loss	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Unrealized Gain or Loss	-	-	-	-	-	-	-	-	-	-	-	-
Pension Expense	-	-	-	-	-	-	-	-	-	-	-	-
FAS106 Adjustment	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736	29,736	18,958	18,958
<b>Benefits - Subtotal</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>29,736</b>	<b>18,958</b>	<b>18,958</b>
CWIP	(81,088)	(81,088)	(81,088)	(81,088)	(81,088)	(81,088)	(81,088)	(81,088)	(81,088)	(81,088)	631,594	631,594
RWIP	(52,369)	(52,369)	(52,369)	(52,369)	(52,369)	(52,369)	(52,369)	(52,369)	(52,369)	(52,369)	(47,648)	(47,648)
<b>CWIP/RWIP - Subtotal</b>	<b>(133,457)</b>	<b>(133,457)</b>	<b>(133,457)</b>	<b>(133,457)</b>	<b>(133,457)</b>	<b>(133,457)</b>	<b>(133,457)</b>	<b>(133,457)</b>	<b>(133,457)</b>	<b>(133,457)</b>	<b>583,946</b>	<b>583,946</b>
Fixed Asset Cost Adjustment	(101,079,155)	(101,079,155)	(101,079,155)	(103,808,145)	(103,808,145)	(103,808,145)	(104,751,034)	(104,751,034)	(104,751,034)	(104,751,034)	(99,190,469)	(99,190,469)
Depreciation Adjustment	(32,887,309)	(32,887,309)	(32,887,309)	(33,272,401)	(33,272,401)	(33,272,401)	(33,585,505)	(33,585,505)	(33,585,505)	(33,585,505)	(36,964,103)	(36,964,103)
Book Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Cushion Gas	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Line Pack Gas	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Cost	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Accum	-	-	-	-	-	-	-	-	-	-	-	-
Repair % Completion Allowance	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) TPR	-	-	-	-	-	-	-	-	-	-	-	-
Repairs Aggregation Sec 481(a) Adj	-	-	-	-	-	-	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj	-	-	-	-	-	-	-	-	-	-	-	-
<b>Plant - Subtotal</b>	<b>(133,966,464)</b>	<b>(133,966,464)</b>	<b>(133,966,464)</b>	<b>(137,080,546)</b>	<b>(137,080,546)</b>	<b>(137,080,546)</b>	<b>(138,336,539)</b>	<b>(138,336,539)</b>	<b>(138,336,539)</b>	<b>(138,336,539)</b>	<b>(136,154,572)</b>	<b>(136,154,572)</b>
Deferred Gas Costs	2,932,638	2,932,638	2,932,638	2,525,883	2,525,883	2,525,883	2,039,530	2,039,530	2,039,530	2,039,530	528,447	528,447
Over Recoveries of PGA	(5,017,403)	(5,017,403)	(5,017,403)	(4,918,759)	(4,918,759)	(4,918,759)	(3,787,553)	(3,787,553)	(3,787,553)	(3,787,553)	(2,500,805)	(2,500,805)
PGA - Amended Item	-	-	-	-	-	-	-	-	-	-	-	-
<b>Gas Cost Adjustment - Subtotal</b>	<b>(2,084,765)</b>	<b>(2,084,765)</b>	<b>(2,084,765)</b>	<b>(2,392,876)</b>	<b>(2,392,876)</b>	<b>(2,392,876)</b>	<b>(1,748,023)</b>	<b>(1,748,023)</b>	<b>(1,748,023)</b>	<b>(1,748,023)</b>	<b>(1,972,358)</b>	<b>(1,972,358)</b>
LGS - Goodwill Amortization	-	-	-	-	-	-	-	-	-	-	-	-
TXU - Goodwill Amortization	-	-	-	-	-	-	-	-	-	-	-	-
<b>Goodwill - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Customer Advances	183,666	183,666	183,666	183,666	183,666	183,666	183,666	183,666	183,666	183,666	172,606	172,606
Capital Loss CarryForward	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-13523	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Expense Projects	(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	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Projects - TXU Acquisition	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Amortized	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Capitalized	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Assets	(3,192,885)	(3,192,885)	(3,192,885)	(3,198,398)	(3,198,398)	(3,198,398)	(3,144,373)	(3,144,373)	(3,144,373)	(3,144,373)	(3,376,514)	(3,376,514)
DIG on Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - WKG	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Liabilities	3,192,885	3,192,885	3,192,885	3,198,398	3,198,398	3,198,398	3,144,373	3,144,373	3,144,373	3,144,373	3,376,514	3,376,514



**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024
	12/31/2023	1/31/2024	2/29/2024	3/31/2024	4/30/2024	5/31/2024	6/30/2024	6/30/2024	7/31/2024	8/31/2024	9/30/2024
<b>Other - Subtotal</b>	<b>8,145,587</b>	<b>7,980,650</b>	<b>7,815,713</b>	<b>9,263,547</b>	<b>9,098,610</b>	<b>8,933,673</b>	<b>8,290,265</b>	<b>8,290,265</b>	<b>8,125,328</b>	<b>7,960,391</b>	<b>6,296,356</b>
FD-NOL Credit Carryforward - Non Reg	-	-	-	-	-	-	-	-	-	-	-
FD-NOL Credit Carryforward - Utility	-	-	-	-	-	-	-	-	-	-	-
FD-NOL Credit Carryforward - Other	-	-	-	-	-	-	-	-	-	-	-
ST-State Net Operating Loss	6,431,960	6,431,960	6,431,960	5,905,450	5,905,450	5,905,450	5,865,312	5,865,312	5,865,312	5,865,312	6,786,468
ST-State Bonus Depreciation	2,869,415	2,869,415	2,869,415	2,869,415	2,869,415	2,869,415	2,869,415	2,869,415	2,869,415	2,869,415	2,507,549
FD-FAS 115 Adjustment	-	-	-	-	-	-	-	-	-	-	-
FD-Treasury Lock Adjustment	-	-	-	-	-	-	-	-	-	-	-
FD-Other	-	-	-	-	-	-	-	-	-	-	-
FD-Federal Benefit on State Bonus	(602,577)	(602,577)	(602,577)	(602,577)	(602,577)	(602,577)	(602,577)	(602,577)	(602,577)	(602,577)	(526,585)
FD-Federal Benefit on State NOL	(1,350,712)	(1,350,712)	(1,350,712)	(1,240,144)	(1,240,144)	(1,240,144)	(1,231,716)	(1,231,716)	(1,231,716)	(1,231,716)	(1,425,158)
FD-Fuel Cell Credit	-	-	-	-	-	-	-	-	-	-	-
State Texas Margin WWE DTL	-	-	-	-	-	-	-	-	-	-	-
ST-Other	-	-	-	-	-	-	-	-	-	-	-
ST - Valuation Allow on State NOL	-	-	-	-	-	-	-	-	-	-	-
FD - Valuation on Fed Tax of St NO	-	-	-	-	-	-	-	-	-	-	-
FD-FAS 158 Measurement Date Change	-	-	-	-	-	-	-	-	-	-	-
FD-AMT Minimum Tax Credit	-	-	-	-	-	-	-	-	-	-	-
ST - Valuation Allow Enterprise Zone ITC	-	-	-	-	-	-	-	-	-	-	-
FD - Valuation Allow Fed Tax Enterprise Zone ITC	-	-	-	-	-	-	-	-	-	-	-
ST-Enterprise Zone ITC	-	-	-	-	-	-	-	-	-	-	-
STATE NOL_FIN48	(1,782,592)	(1,782,592)	(1,782,592)	(1,782,592)	(1,782,592)	(1,782,592)	(1,782,592)	(1,782,592)	(1,782,592)	(1,782,592)	(1,782,592)
STATE NOL_FIN48 TN	-	-	-	-	-	-	-	-	-	-	-
FD-Treasury Lock Adjustment-Realized	-	-	-	-	-	-	-	-	-	-	-
FD-Treasury Lock Adjustment-Unrealized	-	-	-	-	-	-	-	-	-	-	-
FD - Federal Tax on Enterprise ITC	-	-	-	-	-	-	-	-	-	-	-
<b>Other Tax Effected Items - Subtotal</b>	<b>5,565,494</b>	<b>5,565,494</b>	<b>5,565,494</b>	<b>5,149,552</b>	<b>5,149,552</b>	<b>5,149,552</b>	<b>5,117,842</b>	<b>5,117,842</b>	<b>5,117,842</b>	<b>5,117,842</b>	<b>5,559,682</b>
<b>Total Accumulated Deferred Income Tax</b>	<b>(122,604,336)</b>	<b>(122,769,273)</b>	<b>(122,934,210)</b>	<b>(125,319,715)</b>	<b>(125,484,652)</b>	<b>(125,649,589)</b>	<b>(126,931,020)</b>	<b>(126,931,020)</b>	<b>(127,095,957)</b>	<b>(127,260,894)</b>	<b>(125,813,250)</b>
	<b>(122,604,336)</b>	<b>(122,769,273)</b>	<b>(122,934,210)</b>	<b>(125,319,715)</b>	<b>(125,484,652)</b>	<b>(125,649,589)</b>	<b>(126,931,020)</b>	<b>(126,931,020)</b>	<b>(127,095,957)</b>	<b>(127,260,894)</b>	<b>(125,813,250)</b>

(1,011,179) (415,201)  
5,117,842 5,559,682  
2,675,190 2,180,524  
- -

Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Category	Adj Code	Fiscal 2021 9/30/2021	Fiscal 2022 10/31/2021	Fiscal 2022 11/30/2021	Fiscal 2022 12/31/2021	Fiscal 2022 1/31/2022	Fiscal 2022 2/28/2022	Fiscal 2022 3/31/2022	Fiscal 2022 4/30/2022	Fiscal 2022 5/31/2022	Fiscal 2022 6/30/2022	Fiscal 2022 7/31/2022
Environmental Activities	ACC	ACC01											
Ad Valorem Taxes	ACC	ACC02											
Directors Deferred Bonus	ACC	ACC03	94,915	94,915	94,915	96,428	96,428	96,428	98,801	98,801	98,801	100,952	100,952
MIP/VPP Accrual	Excl ACC	ACC04	1,249,670	1,249,670	1,249,670	1,278,088	1,278,088	1,278,088	1,306,506	1,306,506	1,306,506	1,334,924	1,334,924
Accrued Environmental Asset	ACC	ACC05											
Miscellaneous Accrued	ACC	ACC06	-	-	-	-	-	-	6,428	6,428	6,428	5,858	5,858
Self Insurance - Adjustment	Excl ACC	ACC08	2,086,143	2,086,143	2,086,143	9,880,030	9,880,030	9,880,030	(349,917)	(349,917)	(349,917)	(271,440)	(271,440)
Vacation Accrual	ACC	ACC11	67,023	67,023	67,023	67,023	67,023	67,023	67,023	67,023	67,023	67,023	67,023
Worker's Comp Insurance Reserve	ACC	ACC12	55,170	55,170	55,170	57,705	57,705	57,705	67,641	67,641	67,641	65,522	65,522
<b>Accrual - Subtotal</b>			<b>3,552,921</b>	<b>3,552,921</b>	<b>3,552,921</b>	<b>11,379,274</b>	<b>11,379,274</b>	<b>11,379,274</b>	<b>1,196,482</b>	<b>1,196,482</b>	<b>1,196,482</b>	<b>1,302,839</b>	<b>1,302,839</b>
Rabbi Trust - True Up	BEN	NBP01											
SEBP Adjustment	Excl BEN	NBP03	11,156,393	11,156,393	11,156,393	7,704,295	7,704,295	7,704,295	7,800,331	7,800,331	7,800,331	7,895,271	7,895,271
SERP DTL Offset	Excl BEN	NBP04	(3,482,825)	(3,482,825)	(3,482,825)	-	-	-	-	-	-	-	-
Restricted Stock Grant Plan	Excl BEN	NBP05	(4,330,129)	(4,330,129)	(4,330,129)	(3,659,230)	(3,659,230)	(3,659,230)	(3,855,052)	(3,855,052)	(3,855,052)	(3,647,768)	(3,647,768)
Rabbi Trust	Excl BEN	NBP06	895,381	895,381	895,381	895,381	895,381	895,381	895,381	895,381	895,381	895,381	895,381
VEBA Trust Contribution Adjustment	Excl BEN	NBP08	4,800,453	4,800,453	4,800,453	4,911,712	4,911,712	4,911,712	4,911,712	4,911,712	4,911,712	4,911,712	4,911,712
Restricted Stock - MIP	Excl BEN	NBP13	10,725,812	10,725,812	10,725,812	10,725,812	10,725,812	10,725,812	10,725,812	10,725,812	10,725,812	10,725,812	10,725,812
Director's Stock Awards	Excl BEN	NBP16	5,757,264	5,757,264	5,757,264	3,934,672	3,934,672	3,934,672	3,997,721	3,997,721	3,997,721	4,052,407	4,052,407
Director's Stock - Temp	BEN	NBP18	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Book Gain or Loss	BEN	NBP22	(1,384,637)	(1,384,637)	(1,384,637)	(1,384,637)	(1,384,637)	(1,384,637)	(1,384,637)	(1,384,637)	(1,384,637)	(1,384,637)	(1,384,637)
Rabbi Trust Tax Gain or Loss	BEN	NBP23	1,384,637	1,384,637	1,384,637	1,384,637	1,384,637	1,384,637	1,384,637	1,384,637	1,384,637	1,384,637	1,384,637
Rabbi Trust Unrealized Gain or Loss	BEN	NBP24	-	-	-	-	-	-	-	-	-	-	-
Pension Expense	Excl BEN	PEN01	590,990	590,990	590,990	914,125	914,125	914,125	1,398,827	1,398,827	1,398,827	1,883,529	1,883,529
FAS106 Adjustment	Excl BEN	PR001	13,781,153	13,781,153	13,781,153	8,186,342	8,186,342	8,186,342	8,198,092	8,198,092	8,198,092	8,176,820	8,176,820
<b>Benefits - Subtotal</b>			<b>39,894,492</b>	<b>39,894,492</b>	<b>39,894,492</b>	<b>33,613,109</b>	<b>33,613,109</b>	<b>33,613,109</b>	<b>34,072,824</b>	<b>34,072,824</b>	<b>34,072,824</b>	<b>34,893,164</b>	<b>34,893,164</b>
CWIP	Excl	CWIP/RWIP	(1,639,039)	(1,639,039)	(1,639,039)	(1,639,039)	(1,639,039)	(1,639,039)	(1,639,039)	(1,639,039)	(1,639,039)	(1,639,039)	(1,639,039)
RWIP	Excl	CWIP/RWIP	-	-	-	-	-	-	-	-	-	-	-
<b>CWIP/RWIP - Subtotal</b>			<b>(1,639,039)</b>	<b>(1,639,039)</b>	<b>(1,639,039)</b>	<b>(1,639,039)</b>	<b>(1,639,039)</b>	<b>(1,639,039)</b>	<b>(1,639,039)</b>	<b>(1,639,039)</b>	<b>(1,639,039)</b>	<b>(1,639,039)</b>	<b>(1,639,039)</b>
Fixed Asset Cost Adjustment	FXA	FXA01	(36,833,985)	(36,833,985)	(36,833,985)	(37,268,722)	(37,268,722)	(37,268,722)	(37,698,924)	(37,698,924)	(37,698,924)	(38,128,666)	(38,128,666)
Depreciation Adjustment	FXA	FXA02	18,771,079	18,771,079	18,771,079	18,497,338	18,497,338	18,497,338	18,523,287	18,523,287	18,523,287	19,227,851	19,227,851
Book Gain/Loss on Sale of Fixed Assets	FXA	FXA03											
Tax Gain/Loss on Sale of Fixed Assets	FXA	FXA04											
Section 481(a) Cushion Gas	FXA	FXA13	337,426	337,426	337,426	337,426	337,426	337,426	337,426	337,426	337,426	337,426	337,426
Section 481(a) Line Pack Gas	FXA	FXA14	40,942	40,942	40,942	40,942	40,942	40,942	40,942	40,942	40,942	40,942	40,942
IRS Audit Assessment - Cost	FXA	FXA15											
IRS Audit Assessment - Accum	FXA	FXA16											
Repair % Completion Allowance	FXA	FXA41											
Section 481(a) TPR	FXA	FXA46											
Repairs Aggregation Sec 481(a) Adj	FXA	FXA50											
AFUDC - Equity Asset Cost Adj	FXA	FXA80	-	-	-	(15,349)	(15,349)	(15,349)	(15,990)	(15,990)	(15,990)	(14,991)	(14,991)
<b>Plant - Subtotal</b>			<b>(17,684,538)</b>	<b>(17,684,538)</b>	<b>(17,684,538)</b>	<b>(18,408,365)</b>	<b>(18,408,365)</b>	<b>(18,408,365)</b>	<b>(18,813,259)</b>	<b>(18,813,259)</b>	<b>(18,813,259)</b>	<b>(18,537,438)</b>	<b>(18,537,438)</b>
Deferred Gas Costs	GCA	GCA01											
Over Recoveries of PGA	GCA	GCA03											
PGA - Amended Item	GCA	GCA04											
<b>Gas Cost Adjustment - Subtotal</b>			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
LGS - Goodwill Amortization	GDW	ONT13											
TXU - Goodwill Amortization	GDW	ONT49											
<b>Goodwill - Subtotal</b>			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Customer Advances	ONT	CAP01											
Capital Loss CarryForward	ONT	CAP_LOSS_CF											
Amortization - LGS Acq. 1810-13523	ONT	DTE01											
Deferred Expense Projects	ONT	DTE09											
Amortization - LGS Acq. 1810-14155	ONT	DTE12											
Deferred Projects - TXU Acquisition	ONT	DTE14											
RAR 91/93 Bond Cost Amortized	ONT	DVA05											
RAR 91/93 Bond Cost Capitalized	ONT	DVA06											
Leases - Assets	ONT	DVA10	(10,862,628)	(10,862,628)	(10,862,628)	(10,718,449)	(10,718,449)	(10,718,449)	(10,501,718)	(10,501,718)	(10,501,718)	(10,292,346)	(10,292,346)
DIG on Fixed Assets	ONT	DVA16											
DIG on Fixed Assets - UCG Storage	ONT	DVA18											
DIG on Fixed Assets - WKG	ONT	DVA19											
Leases - Liabilities	ONT	DVA20	10,862,628	10,862,628	10,862,628	10,718,449	10,718,449	10,718,449	10,501,718	10,501,718	10,501,718	10,292,346	10,292,346





Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Category	Adj Code	Fiscal 2021	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022
			9/30/2021	10/31/2021	11/30/2021	12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022
<b>Other - Subtotal</b>			<b>(11,639,821)</b>	<b>(11,639,821)</b>	<b>(11,639,821)</b>	<b>(3,720,136)</b>	<b>(3,720,136)</b>	<b>(3,720,136)</b>	<b>(2,663,414)</b>	<b>(2,663,414)</b>	<b>(2,663,414)</b>	<b>(8,795,739)</b>	<b>(8,795,739)</b>
FD-NOL Credit Carryforward - Non Reg	fed nol	TAX	TAX02NR	(172,186,819)	(172,186,819)	(172,186,819)	(173,898,040)	(173,898,040)	(173,898,040)	(174,734,420)	(174,734,420)	(176,055,112)	(176,055,112)
FD-NOL Credit Carryforward - Utility	fed nol	TAX	TAX02U	1,015,494,919	1,015,494,919	1,015,494,919	1,017,844,563	1,017,844,563	1,017,844,563	606,028,135	606,028,135	573,673,647	573,673,647
FD-NOL Credit Carryforward - Other	fed nol	TAX	TAX02OT	6,886,357	6,886,357	6,886,357	6,734,879	6,734,879	6,734,879	6,734,879	6,734,879	6,734,879	6,734,879
ST-State Net Operating Loss	state	TAX	TAX04	262,745	262,745	262,745	436,644	436,644	436,644	436,644	436,644	436,644	436,644
ST-State Bonus Depreciation	state	TAX	TAX05										
FD-FAS 115 Adjustment		TAX	TAX06	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)
FD-Treasury Lock Adjustment		TAX	TAX08										
FD-Other		TAX	TAX10										
FD-Federal Benefit on State Bonus	state	TAX	TAX11										
FD-Federal Benefit on State NOL	state	TAX	TAX12										
FD-Fuel Cell Credit		TAX	TAX15				1,120,717	1,120,717	1,120,717	1,120,717	1,120,717	1,120,717	1,120,717
State Texas Margin WWE DTL		TAX	SATTD_ONT10										
ST-Other	state	TAX	TAX43										
ST - Valuation Allow on State NOL		TAX	TAX13										
FD - Valuation on Fed Tax of St NO		TAX	TAX14										
FD-FAS 158 Measurement Date Change		TAX	TAX22										
FD-AMT Minimum Tax Credit		TAX	TAX23										
ST- Valuation Allow Enterprise Zone ITC	state	TAX	TAX37	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)
FD- Valuation Allow Fed Tax Enterprise Zone ITC	state	TAX	TAX38	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809
ST-Enterprise Zone ITC	state	TAX	TAX39	2,213,331	2,213,331	2,213,331	2,213,331	2,213,331	2,213,331	2,213,331	2,213,331	2,213,331	2,213,331
STATE NOL_FIN48	state	TAX	TAX44										
STATE NOL_FIN48 TN	state	TAX	TAX45										
FD-Treasury Lock Adjustment-Realized		TAX	TAX40	17,941,793	17,870,111	17,798,428	17,726,746	17,655,064	17,583,381	17,511,699	17,440,017	17,368,334	17,296,652
FD-Treasury Lock Adjustment-Unrealized		TAX	TAX41	(38,090,514)	(28,957,718)	(18,147,957)	(24,615,587)	(41,785,601)	(43,646,845)	(59,628,131)	(93,255,617)	(101,722,095)	(105,581,121)
FD -Federal Tax on Enterprise ITC	state	TAX	TAX42	(464,800)	(464,800)	(464,800)	(464,800)	(464,800)	(464,800)	(464,800)	(464,800)	(464,800)	(464,800)
<b>Other Tax Effected Items - Subtotal</b>				<b>829,489,856</b>	<b>838,550,969</b>	<b>849,289,047</b>	<b>844,531,296</b>	<b>827,289,600</b>	<b>825,356,673</b>	<b>396,650,898</b>	<b>362,951,730</b>	<b>354,413,569</b>	<b>316,807,681</b>
<b>Total Accumulated Deferred Income Tax</b>				<b>841,973,871</b>	<b>851,034,984</b>	<b>861,773,062</b>	<b>865,756,139</b>	<b>848,514,443</b>	<b>846,581,516</b>	<b>408,804,492</b>	<b>375,105,324</b>	<b>366,567,163</b>	<b>324,031,468</b>
				<b>841,973,871</b>	<b>851,034,984</b>	<b>861,773,062</b>	<b>865,756,139</b>	<b>848,514,443</b>	<b>846,581,516</b>	<b>408,804,492</b>	<b>375,105,324</b>	<b>366,567,163</b>	<b>324,031,468</b>

Excluded 35,796,993  
State Only 1,910,422  
TCJA Reg Liab Related -  
Fed NOL 850,194,457

(45,928,001) (81,301,236)  
17,941,793 (86,669,920)  
(38,090,514)  
(20,148,721)





Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Fiscal 2022 8/31/2022	Fiscal 2022 9/30/2022	Fiscal 2023 10/31/2022	Fiscal 2023 11/30/2022	Fiscal 2023 12/31/2022	Fiscal 2023 1/31/2023	Fiscal 2023 2/28/2023	Fiscal 2023 3/31/2023	Fiscal 2023 4/30/2023	Fiscal 2023 5/31/2023	Fiscal 2023 6/30/2023	Fiscal 2023 7/31/2023	Fiscal 2023 8/31/2023	Fiscal 2023 9/30/2023	Fiscal 2023 10/31/2023	Fiscal 2024 11/30/2023
<b>Other - Subtotal</b>	<b>(8,795,739)</b>	<b>(11,880,359)</b>	<b>(11,880,359)</b>	<b>(11,880,359)</b>	<b>(10,991,717)</b>	<b>(10,991,717)</b>	<b>(10,991,717)</b>	<b>(23,890,496)</b>	<b>(23,890,496)</b>	<b>(23,890,496)</b>	<b>(17,704,957)</b>	<b>(17,704,957)</b>	<b>(17,704,957)</b>	<b>(7,976,717)</b>	<b>(7,976,717)</b>	<b>(7,976,717)</b>
FD-NOL Credit Carryforward - Non Reg	(176,055,112)	(177,504,317)	(177,504,317)	(177,504,317)	(178,972,714)	(178,972,714)	(178,972,714)	(179,951,007)	(179,951,007)	(179,951,007)	(181,392,985)	(181,392,985)	(181,392,985)	(182,172,220)	(182,172,220)	(182,172,220)
FD-NOL Credit Carryforward - Utility	573,673,647	610,407,005	610,407,005	610,407,005	610,865,223	610,865,223	610,865,223	567,447,871	567,447,871	567,447,871	583,275,066	583,275,066	583,275,066	631,058,684	631,058,684	631,058,684
FD-NOL Credit Carryforward - Other	6,734,879	8,380,701	8,380,701	8,380,701	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	8,248,175	9,790,216	9,790,216	9,790,216
ST-State Net Operating Loss	436,644	978,371	978,371	978,371	978,371	978,371	978,371	978,371	978,371	978,371	978,371	978,371	978,371	501,177	501,177	501,177
ST-State Bonus Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-FAS 115 Adjustment	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)
FD-Treasury Lock Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Federal Benefit on State Bonus	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Federal Benefit on State NOL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Fuel Cell Credit	1,120,717	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
State Texas Margin WVE DTL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ST-Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ST - Valuation Allow on State NOL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD - Valuation on Fed Tax of St NO	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-FAS 158 Measurement Date Change	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-AMT Minimum Tax Credit	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ST- Valuation Allow Enterprise Zone ITC	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)
FD- Valuation Allow Fed Tax Enterprise Zone ITC	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809
ST-Enterprise Zone ITC	2,213,331	2,408,409	2,408,409	2,408,409	2,408,409	2,408,409	2,408,409	2,408,409	2,408,409	2,408,409	2,408,409	2,408,409	2,408,409	2,399,680	2,399,680	2,399,680
STATE NOL_FIN48	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
STATE NOL_FIN48 TN	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Treasury Lock Adjustment-Realized	17,153,288	(27,203,680)	(27,152,619)	(27,101,557)	(27,050,496)	(26,999,435)	(26,948,374)	(26,897,313)	(26,846,252)	(26,795,191)	(26,744,129)	(26,693,068)	(26,642,007)	(64,972,208)	(64,732,208)	(64,492,207)
FD-Treasury Lock Adjustment-Unrealized	(104,924,806)	(79,614,961)	(95,033,677)	(77,884,472)	(86,164,526)	(77,176,952)	(86,936,232)	(77,511,825)	(80,539,706)	(89,531,553)	(90,245,689)	(99,063,898)	(107,144,119)	(84,994,853)	(94,212,423)	(82,824,782)
FD -Federal Tax on Enterprise ITC	(464,800)	(505,766)	(505,766)	(505,766)	(505,766)	(505,766)	(505,766)	(505,766)	(505,766)	(505,766)	(505,766)	(505,766)	(505,766)	(503,933)	(503,933)	(503,933)
<b>Other Tax Effected Items - Subtotal</b>	<b>317,320,631</b>	<b>334,778,605</b>	<b>319,410,951</b>	<b>336,611,217</b>	<b>327,239,519</b>	<b>336,278,154</b>	<b>326,569,936</b>	<b>291,649,759</b>	<b>288,672,939</b>	<b>279,732,153</b>	<b>293,454,295</b>	<b>284,687,147</b>	<b>276,657,987</b>	<b>308,539,386</b>	<b>299,561,816</b>	<b>311,189,458</b>
<b>Total Accumulated Deferred Income Tax</b>	<b>324,544,418</b>	<b>342,022,601</b>	<b>326,654,947</b>	<b>343,855,213</b>	<b>334,168,941</b>	<b>343,207,576</b>	<b>333,499,358</b>	<b>285,968,200</b>	<b>282,991,380</b>	<b>274,050,594</b>	<b>293,464,394</b>	<b>284,697,246</b>	<b>276,668,086</b>	<b>314,468,054</b>	<b>305,490,484</b>	<b>317,118,126</b>

25,188,290  
2,780,160  
-  
441,283,389  
  
(127,229,238)  
  
(27,203,680)  
(79,614,961)  
(106,818,641)

21,428,201  
2,296,070  
-  
458,676,680

Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024
	12/31/2023	1/31/2024	2/29/2024	3/31/2024	4/30/2024	5/31/2024	6/30/2024	6/30/2024	7/31/2024	8/31/2024	9/30/2024	9/30/2024
Environmental Activities	-	-	-	-	-	-	-	-	-	-	-	-
Ad Valorem Taxes	-	-	-	-	-	-	-	-	-	-	-	-
Directors Deferred Bonus	32,244	32,244	32,244	34,800	34,800	34,800	37,403	37,403	37,403	37,403	40,193	40,193
MIP/VPP Accrual	900,522	900,522	900,522	936,974	936,974	936,974	973,425	973,425	973,425	973,425	1,177,127	1,177,127
Accrued Environmental Asset	-	-	-	-	-	-	-	-	-	-	-	-
Miscellaneous Accrued	-	-	-	-	-	-	17	17	17	17	-	-
Self Insurance - Adjustment	679,877	679,877	679,877	(8,407,498)	(8,407,498)	(8,407,498)	3,004,096	3,004,096	3,004,096	3,004,096	3,640,505	3,640,505
Vacation Accrual	51,114	51,114	51,114	51,114	51,114	51,114	51,114	51,114	51,114	51,114	23,539	23,539
Worker's Comp Insurance Reserve	55,754	55,754	55,754	55,277	55,277	55,277	53,850	53,850	53,850	53,850	52,462	52,462
<b>Accrual - Subtotal</b>	<b>1,719,511</b>	<b>1,719,511</b>	<b>1,719,511</b>	<b>(7,329,333)</b>	<b>(7,329,333)</b>	<b>(7,329,333)</b>	<b>4,119,905</b>	<b>4,119,905</b>	<b>4,119,905</b>	<b>4,119,905</b>	<b>4,933,826</b>	<b>4,933,826</b>
Rabbi Trust - True Up	-	-	-	-	-	-	-	-	-	-	-	-
SEBP Adjustment	7,329,364	7,329,364	7,329,364	6,298,606	6,298,606	6,298,606	6,288,048	6,288,048	6,288,048	6,288,048	5,603,373	5,603,373
SERP DTL Offset	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock Grant Plan	(5,177,922)	(5,177,922)	(5,177,922)	(5,177,922)	(5,177,922)	(5,177,922)	(5,177,922)	(5,177,922)	(5,177,922)	(5,177,922)	(5,540,782)	(5,540,782)
Rabbi Trust	896,430	896,430	896,430	896,430	896,430	896,430	896,430	896,430	896,430	896,430	892,937	892,937
VEBA Trust Contribution Adjustment	4,911,712	4,911,712	4,911,712	4,911,712	4,911,712	4,911,712	4,911,712	4,911,712	4,911,712	4,911,712	4,903,059	4,903,059
Restricted Stock - MIP	11,994,141	11,994,141	11,994,141	11,994,141	11,994,141	11,994,141	11,994,141	11,994,141	11,994,141	11,994,141	11,280,430	11,280,430
Director's Stock Awards	3,085,107	3,085,107	3,085,107	3,460,731	3,460,731	3,460,731	3,499,676	3,499,676	3,499,676	3,499,676	3,568,372	3,568,372
Director's Stock - Temp	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Book Gain or Loss	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Tax Gain or Loss	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Unrealized Gain or Loss	2,233,934	2,233,934	2,233,934	2,130,685	2,130,685	2,130,685	2,125,078	2,125,078	2,125,078	2,125,078	1,861,538	1,861,538
Pension Expense	523,469	523,469	523,469	882,398	882,398	882,398	1,241,328	1,241,328	1,241,328	1,241,328	597,745	597,745
FAS106 Adjustment	7,591,377	7,591,377	7,591,377	7,424,072	7,424,072	7,424,072	7,305,130	7,305,130	7,305,130	7,305,130	7,050,367	7,050,367
<b>Benefits - Subtotal</b>	<b>33,387,612</b>	<b>33,387,612</b>	<b>33,387,612</b>	<b>32,820,853</b>	<b>32,820,853</b>	<b>32,820,853</b>	<b>33,083,621</b>	<b>33,083,621</b>	<b>33,083,621</b>	<b>33,083,621</b>	<b>30,217,039</b>	<b>30,217,039</b>
CWIP	(1,499,174)	(1,499,174)	(1,499,174)	(1,499,174)	(1,499,174)	(1,499,174)	(1,499,174)	(1,499,174)	(1,499,174)	(1,499,174)	(1,336,136)	(1,336,136)
RWIP	-	-	-	-	-	-	-	-	-	-	-	-
<b>CWIP/RWIP - Subtotal</b>	<b>(1,499,174)</b>	<b>(1,499,174)</b>	<b>(1,499,174)</b>	<b>(1,499,174)</b>	<b>(1,499,174)</b>	<b>(1,499,174)</b>	<b>(1,499,174)</b>	<b>(1,499,174)</b>	<b>(1,499,174)</b>	<b>(1,499,174)</b>	<b>(1,336,136)</b>	<b>(1,336,136)</b>
Fixed Asset Cost Adjustment	(38,372,991)	(38,372,991)	(38,372,991)	(38,436,452)	(38,436,452)	(38,436,452)	(38,499,914)	(38,499,914)	(38,499,914)	(38,499,914)	(36,095,392)	(36,095,392)
Depreciation Adjustment	18,625,967	18,625,967	18,625,967	18,591,767	18,591,767	18,591,767	19,313,453	19,313,453	19,313,453	19,313,453	19,408,674	19,408,674
Book Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Cushion Gas	337,426	337,426	337,426	337,426	337,426	337,426	337,426	337,426	337,426	337,426	336,832	336,832
Section 481(a) Line Pack Gas	40,942	40,942	40,942	40,942	40,942	40,942	40,942	40,942	40,942	40,942	40,870	40,870
IRS Audit Assessment - Cost	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Accum	-	-	-	-	-	-	-	-	-	-	-	-
Repair % Completion Allowance	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) TPR	-	-	-	-	-	-	-	-	-	-	-	-
Repairs Aggregation Sec 481(a) Adj	-	-	-	-	-	-	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj	-	-	-	-	-	-	-	-	-	-	-	-
<b>Plant - Subtotal</b>	<b>(19,368,656)</b>	<b>(19,368,656)</b>	<b>(19,368,656)</b>	<b>(19,466,317)</b>	<b>(19,466,317)</b>	<b>(19,466,317)</b>	<b>(18,808,093)</b>	<b>(18,808,093)</b>	<b>(18,808,093)</b>	<b>(18,808,093)</b>	<b>(16,309,016)</b>	<b>(16,309,016)</b>
Deferred Gas Costs	-	-	-	-	-	-	-	-	-	-	-	-
Over Recoveries of PGA	-	-	-	-	-	-	-	-	-	-	-	-
PGA - Amended Item	-	-	-	-	-	-	-	-	-	-	-	-
<b>Gas Cost Adjustment - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
LGS - Goodwill Amortization	-	-	-	-	-	-	-	-	-	-	-	-
TXU - Goodwill Amortization	-	-	-	-	-	-	-	-	-	-	-	-
<b>Goodwill - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Customer Advances	-	-	-	-	-	-	-	-	-	-	-	-
Capital Loss CarryForward	2,366	2,366	2,366	2,366	2,366	2,366	2,366	2,366	2,366	2,366	312,834	312,834
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	(9,779,500)	(9,779,500)	(9,779,500)	(9,590,096)	(9,590,096)	(9,590,096)	(9,516,482)	(9,516,482)	(9,516,482)	(9,516,482)	(9,392,957)	(9,392,957)
DIG on Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - WKG	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Liabilities	9,779,500	9,779,500	9,779,500	9,590,096	9,590,096	9,590,096	9,516,482	9,516,482	9,516,482	9,516,482	9,392,957	9,392,957



Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024
	12/31/2023	1/31/2024	2/29/2024	3/31/2024	4/30/2024	5/31/2024	6/30/2024	6/30/2024	7/31/2024	8/31/2024	9/30/2024	9/30/2024
<b>Other - Subtotal</b>	<b>(8,582,234)</b>	<b>(8,582,234)</b>	<b>(8,582,234)</b>	<b>(17,245,692)</b>	<b>(17,245,692)</b>	<b>(17,245,692)</b>	<b>(15,339,653)</b>	<b>(15,339,653)</b>	<b>(15,339,653)</b>	<b>(15,339,653)</b>	<b>(13,034,522)</b>	<b>(13,034,522)</b>
FD-NOL Credit Carryforward - Non Reg	(183,632,891)	(183,632,891)	(183,632,891)	(184,671,913)	(184,671,913)	(184,671,913)	(186,397,886)	(186,397,886)	(186,397,886)	(186,397,886)	(188,094,637)	(188,094,637)
FD-NOL Credit Carryforward - Utility	613,526,418	613,526,418	613,526,418	578,886,554	578,886,554	578,886,554	577,387,922	577,387,922	577,387,922	577,387,922	620,311,385	620,311,385
FD-NOL Credit Carryforward - Other	8,865,702	8,865,702	8,865,702	8,332,257	8,332,257	8,332,257	8,132,211	8,132,211	8,132,211	8,132,211	9,696,591	9,696,591
ST-State Net Operating Loss	501,177	501,177	501,177	501,177	501,177	501,177	501,177	501,177	501,177	501,177	501,177	501,177
ST-State Bonus Depreciation	-	-	-	-	-	-	-	-	-	-	-	-
FD-FAS 115 Adjustment	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)	(2,466,303)
FD-Treasury Lock Adjustment	-	-	-	-	-	-	-	-	-	-	-	-
FD-Other	-	-	-	-	-	-	-	-	-	-	-	-
FD-Federal Benefit on State Bonus	-	-	-	-	-	-	-	-	-	-	-	-
FD-Federal Benefit on State NOL	-	-	-	-	-	-	-	-	-	-	-	-
FD-Fuel Cell Credit	-	-	-	-	-	-	(39,445)	(39,445)	(39,445)	(39,445)	(39,445)	(39,445)
State Texas Margin WWE DTL	-	-	-	-	-	-	-	-	-	-	-	-
ST-Other	-	-	-	3,793	3,793	3,793	3,793	3,793	3,793	3,793	3,687	3,687
ST - Valuation Allow on State NOL	-	-	-	-	-	-	-	-	-	-	-	-
FD - Valuation on Fed Tax of St NO	-	-	-	-	-	-	-	-	-	-	-	-
FD-FAS 158 Measurement Date Change	-	-	-	-	-	-	-	-	-	-	-	-
FD-AMT Minimum Tax Credit	-	-	-	-	-	-	-	-	-	-	-	-
ST- Valuation Allow Enterprise Zone ITC	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)	(127,663)
FD- Valuation Allow Fed Tax Enterprise Zone ITC	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809	26,809
ST-Enterprise Zone ITC	2,399,680	2,399,680	2,399,680	2,399,680	2,399,680	2,399,680	2,399,680	2,399,680	2,399,680	2,399,680	2,622,583	2,622,583
STATE NOL_FIN48	-	-	-	-	-	-	-	-	-	-	-	-
STATE NOL_FIN48 TN	-	-	-	-	-	-	-	-	-	-	-	-
FD-Treasury Lock Adjustment-Realized	(64,252,206)	(64,012,206)	(63,772,205)	(63,532,204)	(63,292,204)	(63,052,203)	(62,812,202)	(62,812,202)	(62,572,202)	(62,332,201)	(113,912,589)	(113,912,589)
FD-Treasury Lock Adjustment-Unrealized	(71,201,740)	(76,832,949)	(79,627,647)	(79,771,419)	(89,585,933)	(87,239,398)	(84,663,650)	(84,663,650)	(81,029,806)	(77,737,938)	(20,623,877)	(20,623,877)
FD -Federal Tax on Enterprise ITC	(503,933)	(503,933)	(503,933)	(503,933)	(503,933)	(503,933)	(503,933)	(503,933)	(503,933)	(503,933)	(550,742)	(550,742)
<b>Other Tax Effected Items - Subtotal</b>	<b>303,135,050</b>	<b>297,743,842</b>	<b>295,189,144</b>	<b>259,076,835</b>	<b>249,502,322</b>	<b>252,088,857</b>	<b>251,440,510</b>	<b>251,440,510</b>	<b>255,314,355</b>	<b>258,846,223</b>	<b>307,346,976</b>	<b>307,346,976</b>
<b>Total Accumulated Deferred Income Tax</b>	<b>308,792,109</b>	<b>303,400,901</b>	<b>300,846,203</b>	<b>246,357,172</b>	<b>236,782,659</b>	<b>239,369,194</b>	<b>252,997,116</b>	<b>252,997,116</b>	<b>256,870,961</b>	<b>260,402,829</b>	<b>311,818,167</b>	<b>311,818,167</b>
	<b>308,792,109</b>	<b>303,400,901</b>	<b>300,846,203</b>	<b>246,357,172</b>	<b>236,782,659</b>	<b>239,369,194</b>	<b>252,997,116</b>	<b>252,997,116</b>	<b>256,870,961</b>	<b>260,402,829</b>	<b>311,818,167</b>	<b>311,818,167</b>

19,995,420	17,982,823
2,299,863	2,475,851
-	-
399,122,247	441,913,339

Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Category	Adj Code	Fiscal 2021	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2023
			9/30/2021	10/31/2021	11/30/2021	12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	10/31/2022
Environmental Activities	ACC	ACC01														
Ad Valorem Taxes	ACC	ACC02														
Directors Deferred Bonus	ACC	ACC03														
MIP/VPP Accrual	Excl ACC	ACC04	(687,431)	(687,431)	(687,431)	(688,190)	(688,190)	(688,190)	(688,949)	(688,949)	(688,949)	(689,708)	(689,708)	(689,708)	(834,776)	(834,776)
Accrued Environmental Asset	ACC	ACC05														
Miscellaneous Accrued	ACC	ACC06														
Self Insurance - Adjustment	ACC	ACC08														
Vacation Accrual	ACC	ACC11	9,852	9,852	9,852	9,852	9,852	9,852	9,852	9,852	9,852	9,852	9,852	9,852	224	224
Worker's Comp Insurance Reserve	ACC	ACC12	530	530	530	560	560	560	646	646	646	720	720	720	729	729
<b>Accrual - Subtotal</b>			<b>(677,049)</b>	<b>(677,049)</b>	<b>(677,049)</b>	<b>(677,778)</b>	<b>(677,778)</b>	<b>(677,778)</b>	<b>(678,451)</b>	<b>(678,451)</b>	<b>(678,451)</b>	<b>(679,136)</b>	<b>(679,136)</b>	<b>(679,136)</b>	<b>(833,823)</b>	<b>(833,823)</b>
Rabbi Trust - True Up	BEN	NBP01														
SEBP Adjustment	BEN	NBP03														
SERP DTL Offset	BEN	NBP04														
Restricted Stock Grant Plan	BEN	NBP05														
Rabbi Trust	BEN	NBP06														
VEBA Trust Contribution Adjustment	BEN	NBP08														
Restricted Stock - MIP	BEN	NBP13														
Director's Stock Awards	BEN	NBP16														
Director's Stock - Temp	BEN	NBP18														
Rabbi Trust Book Gain or Loss	BEN	NBP22														
Rabbi Trust Tax Gain or Loss	BEN	NBP23														
Rabbi Trust Unrealized Gain or Loss	BEN	NBP24														
Pension Expense	BEN	PEN01														
FAS106 Adjustment	BEN	PRB01	(936,951)	(936,951)	(936,951)	(1,107,361)	(1,107,361)	(1,107,361)	(1,145,022)	(1,145,022)	(1,145,022)	(1,149,269)	(1,149,269)	(1,149,269)	(1,146,908)	(1,146,908)
<b>Benefits - Subtotal</b>			<b>(936,951)</b>	<b>(936,951)</b>	<b>(936,951)</b>	<b>(1,107,361)</b>	<b>(1,107,361)</b>	<b>(1,107,361)</b>	<b>(1,145,022)</b>	<b>(1,145,022)</b>	<b>(1,145,022)</b>	<b>(1,149,269)</b>	<b>(1,149,269)</b>	<b>(1,149,269)</b>	<b>(1,146,908)</b>	<b>(1,146,908)</b>
CWIP	Excl CWIP/RWIP	FXA26	(236,984)	(236,984)	(236,984)	(236,984)	(236,984)	(236,984)	(236,984)	(236,984)	(236,984)	(236,984)	(236,984)	(236,984)	(62,582)	(62,582)
RWIP	Excl CWIP/RWIP	FXA47	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>CWIP/RWIP - Subtotal</b>			<b>(236,984)</b>	<b>(236,984)</b>	<b>(236,984)</b>	<b>(236,984)</b>	<b>(236,984)</b>	<b>(236,984)</b>	<b>(236,984)</b>	<b>(236,984)</b>	<b>(236,984)</b>	<b>(236,984)</b>	<b>(236,984)</b>	<b>(236,984)</b>	<b>(62,582)</b>	<b>(62,582)</b>
Fixed Asset Cost Adjustment	FXA	FXA01	(22,333,444)	(22,333,444)	(22,333,444)	(22,396,903)	(22,396,903)	(22,396,903)	(22,460,362)	(22,460,362)	(22,460,362)	(22,523,822)	(22,523,822)	(22,523,822)	(23,037,662)	(23,037,662)
Depreciation Adjustment	FXA	FXA02	9,083,799	9,083,799	9,083,799	9,555,624	9,555,624	9,555,624	9,977,712	9,977,712	9,977,712	10,087,031	10,087,031	10,087,031	10,648,828	10,648,828
Book Gain/Loss on Sale of Fixed Assets	FXA	FXA03														
Tax Gain/Loss on Sale of Fixed Assets	FXA	FXA04														
Section 481(a) Cushion Gas	FXA	FXA13														
Section 481(a) Line Pack Gas	FXA	FXA14														
IRS Audit Assessment - Cost	FXA	FXA15														
IRS Audit Assessment - Accum	FXA	FXA16														
Repair % Completion Allowance	FXA	FXA41														
Section 481(a) TPR	FXA	FXA46														
Repairs Aggregation Sec 481(a) Adj	FXA	FXA50														
AFUDC - Equity Asset Cost Adj	FXA	FXA80														
<b>Plant - Subtotal</b>			<b>(13,249,645)</b>	<b>(13,249,645)</b>	<b>(13,249,645)</b>	<b>(12,841,279)</b>	<b>(12,841,279)</b>	<b>(12,841,279)</b>	<b>(12,482,650)</b>	<b>(12,482,650)</b>	<b>(12,482,650)</b>	<b>(12,436,791)</b>	<b>(12,436,791)</b>	<b>(12,436,791)</b>	<b>(12,388,834)</b>	<b>(12,388,834)</b>
Deferred Gas Costs	GCA	GCA01														
Over Recoveries of PGA	GCA	GCA03														
PGA - Amended Item	GCA	GCA04														
<b>Gas Cost Adjustment - Subtotal</b>			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
LGS - Goodwill Amortization	GDW	ONT13														
TXU - Goodwill Amortization	GDW	ONT49														
<b>Goodwill - Subtotal</b>			<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Customer Advances	ONT	CAP01														
Capital Loss CarryForward	ONT	CAP_LOSS_CF														
Amorization - LGS Acq. 1810-13523	ONT	DTE01														
Deferred Expense Projects	ONT	DTE09														
Amorization - LGS Acq. 1810-14155	ONT	DTE12														
Deferred Projects - TXU Acquisition	ONT	DTE14														
RAR 91/93 Bond Cost Amortized	ONT	DVA05														
RAR 91/93 Bond Cost Capitalized	ONT	DVA06														
Leases - Assets	ONT	DVA10	(2,545,695)	(2,545,695)	(2,545,695)	(2,510,790)	(2,510,790)	(2,510,790)	(2,458,125)	(2,458,125)	(2,458,125)	(2,405,086)	(2,405,086)	(2,405,086)	(2,333,782)	(2,333,782)
DIG on Fixed Assets	ONT	DVA16														
DIG on Fixed Assets - UCG Storage	ONT	DVA18														
DIG on Fixed Assets - WKG	ONT	DVA19														
Leases - Liabilities	ONT	DVA20	2,545,695	2,545,695	2,545,695	2,510,790	2,510,790	2,510,790	2,458,125	2,458,125	2,458,125	2,405,086	2,405,086	2,405,086	2,333,782	2,333,782







**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Fiscal 2023 11/30/2022	Fiscal 2023 12/31/2022	Fiscal 2023 1/31/2023	Fiscal 2023 2/28/2023	Fiscal 2023 3/31/2023	Fiscal 2023 4/30/2023	Fiscal 2023 5/31/2023	Fiscal 2023 6/30/2023	Fiscal 2023 7/31/2023	Fiscal 2023 8/31/2023	Fiscal 2023 9/30/2023	Fiscal 2024 10/31/2023	Fiscal 2024 11/30/2023	Fiscal 2024 12/31/2023	Fiscal 2024 1/31/2024	Fiscal 2024 2/29/2024	Fiscal 2024 3/31/2024	Fiscal 2024 4/30/2024
Environmental Activities																		
Ad Valorem Taxes																		
Directors Deferred Bonus																		
MIP/VPP Accrual	(834,776)	(833,473)	(833,473)	(833,473)	(832,169)	(832,169)	(832,169)	(830,866)	(830,866)	(830,866)	(756,501)	(756,501)	(756,501)	(758,365)	(758,365)	(758,365)	(760,229)	(760,229)
Accrued Environmental Asset																		
Miscellaneous Accrued																		
Self Insurance - Adjustment																		
Vacation Accrual	224	224	224	224	224	224	224	224	224	224	(8,408)	(8,408)	(8,408)	(8,408)	(8,408)	(8,408)	(8,408)	(8,408)
Worker's Comp Insurance Reserve	729	738	738	738	779	779	779	847	847	847	924	924	924	932	932	932	962	962
<b>Accrual - Subtotal</b>	<b>(833,823)</b>	<b>(832,511)</b>	<b>(832,511)</b>	<b>(832,511)</b>	<b>(831,166)</b>	<b>(831,166)</b>	<b>(831,166)</b>	<b>(829,795)</b>	<b>(829,795)</b>	<b>(829,795)</b>	<b>(763,985)</b>	<b>(763,985)</b>	<b>(763,985)</b>	<b>(765,841)</b>	<b>(765,841)</b>	<b>(765,841)</b>	<b>(767,675)</b>	<b>(767,675)</b>
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																		
Rabbi Trust Book Gain or Loss																		
Rabbi Trust Tax Gain or Loss																		
Rabbi Trust Unrealized Gain or Loss																		
Pension Expense																		
FAS106 Adjustment	(1,146,908)	(1,146,908)	(1,146,908)	(1,146,908)	(1,159,540)	(1,159,540)	(1,159,540)	(1,168,981)	(1,168,981)	(1,168,981)	(1,182,516)	(1,182,516)	(1,182,516)	(1,188,408)	(1,188,408)	(1,188,408)	(1,194,926)	(1,194,926)
<b>Benefits - Subtotal</b>	<b>(1,146,908)</b>	<b>(1,146,908)</b>	<b>(1,146,908)</b>	<b>(1,146,908)</b>	<b>(1,159,540)</b>	<b>(1,159,540)</b>	<b>(1,159,540)</b>	<b>(1,168,981)</b>	<b>(1,168,981)</b>	<b>(1,168,981)</b>	<b>(1,182,516)</b>	<b>(1,182,516)</b>	<b>(1,182,516)</b>	<b>(1,188,408)</b>	<b>(1,188,408)</b>	<b>(1,188,408)</b>	<b>(1,194,926)</b>	<b>(1,194,926)</b>
CWIP	(62,582)	(62,582)	(62,582)	(62,582)	(62,582)	(62,582)	(62,582)	(62,582)	(62,582)	(62,582)	(68,320)	(68,320)	(68,320)	(68,320)	(68,320)	(68,320)	(68,320)	(68,320)
RWIP																		
<b>CWIP/RWIP - Subtotal</b>	<b>(62,582)</b>	<b>(62,582)</b>	<b>(62,582)</b>	<b>(62,582)</b>	<b>(62,582)</b>	<b>(62,582)</b>	<b>(62,582)</b>	<b>(62,582)</b>	<b>(62,582)</b>	<b>(62,582)</b>	<b>(68,320)</b>	<b>(68,320)</b>	<b>(68,320)</b>	<b>(68,320)</b>	<b>(68,320)</b>	<b>(68,320)</b>	<b>(68,320)</b>	<b>(68,320)</b>
Fixed Asset Cost Adjustment	(23,037,662)	(23,144,414)	(23,144,414)	(23,144,414)	(23,251,165)	(23,251,165)	(23,251,165)	(23,357,917)	(23,357,917)	(23,357,917)	(22,696,272)	(22,696,272)	(22,696,272)	(22,699,710)	(22,699,710)	(22,699,710)	(22,703,147)	(22,703,147)
Depreciation Adjustment	10,648,828	11,049,531	11,049,531	11,049,531	11,449,590	11,449,590	11,449,590	11,877,733	11,877,733	11,877,733	12,096,546	12,096,546	12,096,546	12,384,286	12,384,286	12,384,286	12,763,900	12,763,900
Book Gain/Loss on Sale of Fixed Assets																		
Tax Gain/Loss on Sale of Fixed Assets																		
Section 481(a) Cushion Gas																		
Section 481(a) Line Pack Gas																		
IRS Audit Assessment - Cost																		
IRS Audit Assessment - Accum																		
Repair % Completion Allowance																		
Section 481(a) TPR																		
Repairs Aggregation Sec 481(a) Adj																		
AFUDC - Equity Asset Cost Adj																		
<b>Plant - Subtotal</b>	<b>(12,388,834)</b>	<b>(12,094,883)</b>	<b>(12,094,883)</b>	<b>(12,094,883)</b>	<b>(11,801,575)</b>	<b>(11,801,575)</b>	<b>(11,801,575)</b>	<b>(11,480,184)</b>	<b>(11,480,184)</b>	<b>(11,480,184)</b>	<b>(10,599,726)</b>	<b>(10,599,726)</b>	<b>(10,599,726)</b>	<b>(10,315,424)</b>	<b>(10,315,424)</b>	<b>(10,315,424)</b>	<b>(9,939,247)</b>	<b>(9,939,247)</b>
Deferred Gas Costs																		
Over Recoveries of PGA																		
PGA - Amended Item																		
<b>Gas Cost Adjustment - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
LGS - Goodwill Amortization																		
TXU - Goodwill Amortization																		
<b>Goodwill - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Customer Advances																		
Capital Loss CarryForward																		
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	(2,333,782)	(2,297,877)	(2,297,877)	(2,297,877)	(2,243,702)	(2,243,702)	(2,243,702)	(2,189,143)	(2,189,143)	(2,189,143)	(2,115,795)	(2,115,795)	(2,115,795)	(2,235,177)	(2,235,177)	(2,235,177)	(2,176,535)	(2,176,535)
DIG on Fixed Assets																		
DIG on Fixed Assets - UCG Storage																		
DIG on Fixed Assets - WKG																		
Leases - Liabilities	2,333,782	2,297,877	2,297,877	2,297,877	2,243,702	2,243,702	2,243,702	2,189,143	2,189,143	2,189,143	2,115,795	2,115,795	2,115,795	2,235,177	2,235,177	2,235,177	2,176,535	2,176,535



Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Fiscal 2023 11/30/2022	Fiscal 2023 12/31/2022	Fiscal 2023 1/31/2023	Fiscal 2023 2/28/2023	Fiscal 2023 3/31/2023	Fiscal 2023 4/30/2023	Fiscal 2023 5/31/2023	Fiscal 2023 6/30/2023	Fiscal 2023 7/31/2023	Fiscal 2023 8/31/2023	Fiscal 2023 9/30/2023	Fiscal 2023 10/31/2023	Fiscal 2024 11/30/2023	Fiscal 2024 12/31/2023	Fiscal 2024 1/31/2024	Fiscal 2024 2/29/2024	Fiscal 2024 3/31/2024	Fiscal 2024 4/30/2024
<b>Other - Subtotal</b>	44,508	95,283	95,283	95,283	(33,638)	(33,638)	(33,638)	372,712	372,712	372,712	791,658	791,658	791,658	921,570	921,570	921,570	603,246	603,246
FD-NOL Credit Carryforward - Non Reg													-	-	-	-	-	-
FD-NOL Credit Carryforward - Utility													-	-	-	-	-	-
FD-NOL Credit Carryforward - Other													-	-	-	-	-	-
ST-State Net Operating Loss													-	-	-	-	-	-
ST-State Bonus Depreciation													-	-	-	-	-	-
FD-FAS 115 Adjustment													-	-	-	-	-	-
FD-Treasury Lock Adjustment													-	-	-	-	-	-
FD-Other													-	-	-	-	-	-
FD-Federal Benefit on State Bonus													-	-	-	-	-	-
FD-Federal Benefit on State NOL													-	-	-	-	-	-
FD-Fuel Cell Credit													-	-	-	-	-	-
State Texas Margin WWE DTL													-	-	-	-	-	-
ST-Other													-	-	-	-	-	-
ST - Valuation Allow on State NOL													-	-	-	-	-	-
FD - Valuation on Fed Tax of St NO													-	-	-	-	-	-
FD-FAS 158 Measurement Date Change													-	-	-	-	-	-
FD-AMT Minimum Tax Credit													-	-	-	-	-	-
ST- Valuation Allow Enterprise Zone ITC													-	-	-	-	-	-
FD- Valuation Allow Fed Tax Enterprise Zone ITC													-	-	-	-	-	-
ST-Enterprise Zone ITC													-	-	-	-	-	-
STATE NOL_FIN48													-	-	-	-	-	-
STATE NOL_FIN48 TN													-	-	-	-	-	-
FD-Treasury Lock Adjustment-Realized													-	-	-	-	-	-
FD-Treasury Lock Adjustment-Unrealized													-	-	-	-	-	-
FD -Federal Tax on Enterprise ITC													-	-	-	-	-	-
<b>Other Tax Effected Items - Subtotal</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total Accumulated Deferred Income Tax</b>	<b>(14,387,639)</b>	<b>(14,041,601)</b>	<b>(14,041,601)</b>	<b>(14,041,601)</b>	<b>(13,888,501)</b>	<b>(13,888,501)</b>	<b>(13,888,501)</b>	<b>(13,168,830)</b>	<b>(13,168,830)</b>	<b>(13,168,830)</b>	<b>(11,822,889)</b>	<b>(11,822,889)</b>	<b>(11,822,889)</b>	<b>(11,416,423)</b>	<b>(11,416,423)</b>	<b>(11,416,423)</b>	<b>(11,366,922)</b>	<b>(11,366,922)</b>
	<b>(14,387,639)</b>	<b>(14,041,601)</b>	<b>(14,041,601)</b>	<b>(14,041,601)</b>	<b>(13,888,501)</b>	<b>(13,888,499)</b>	<b>(13,888,499)</b>	<b>(13,168,828)</b>	<b>(13,168,828)</b>	<b>(13,168,828)</b>	<b>(11,822,885)</b>	<b>(11,822,889)</b>	<b>(11,822,889)</b>	<b>(11,416,423)</b>	<b>(11,416,423)</b>	<b>(11,416,423)</b>	<b>(11,366,922)</b>	<b>(11,366,922)</b>

(27,859)

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**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024
	5/31/2024	6/30/2024	6/30/2024	7/31/2024	8/31/2024	9/30/2024
Environmental Activities	-	-	-	-	-	-
Ad Valorem Taxes	-	-	-	-	-	-
Directors Deferred Bonus	-	-	-	-	-	-
MIP/VPP Accrual	(760,229)	(762,093)	(762,093)	(762,093)	(762,093)	(241,751)
Accrued Environmental Asset	-	-	-	-	-	-
Miscellaneous Accrued	-	-	-	-	-	-
Self Insurance - Adjustment	-	-	-	-	-	-
Vacation Accrual	(8,408)	(8,408)	(8,408)	(8,408)	(8,408)	(14,216)
Worker's Comp Insurance Reserve	962	991	991	991	991	1,025
<b>Accrual - Subtotal</b>	<b>(767,675)</b>	<b>(769,510)</b>	<b>(769,510)</b>	<b>(769,510)</b>	<b>(769,510)</b>	<b>(254,942)</b>
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	-	-	-	-	-	-
Rabbi Trust Book Gain or Loss	-	-	-	-	-	-
Rabbi Trust Tax Gain or Loss	-	-	-	-	-	-
Rabbi Trust Unrealized Gain or Loss	-	-	-	-	-	-
Pension Expense	-	-	-	-	-	-
FAS106 Adjustment	(1,194,926)	(1,207,677)	(1,207,677)	(1,207,677)	(1,207,677)	(1,214,904)
<b>Benefits - Subtotal</b>	<b>(1,194,926)</b>	<b>(1,207,677)</b>	<b>(1,207,677)</b>	<b>(1,207,677)</b>	<b>(1,207,677)</b>	<b>(1,214,904)</b>
CWIP	(68,320)	(68,320)	(68,320)	(68,320)	(68,320)	(4,426)
RWIP	-	-	-	-	-	-
<b>CWIP/RWIP - Subtotal</b>	<b>(68,320)</b>	<b>(68,320)</b>	<b>(68,320)</b>	<b>(68,320)</b>	<b>(68,320)</b>	<b>(4,426)</b>
Fixed Asset Cost Adjustment	(22,703,147)	(22,706,585)	(22,706,585)	(22,706,585)	(22,706,585)	(23,779,801)
Depreciation Adjustment	12,763,900	13,301,101	13,301,101	13,301,101	13,301,101	13,554,153
Book Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-
Section 481(a) Cushion Gas	-	-	-	-	-	-
Section 481(a) Line Pack Gas	-	-	-	-	-	-
IRS Audit Assessment - Cost	-	-	-	-	-	-
IRS Audit Assessment - Accum	-	-	-	-	-	-
Repair % Completion Allowance	-	-	-	-	-	-
Section 481(a) TPR	-	-	-	-	-	-
Repairs Aggregation Sec 481(a) Adj	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj	-	-	-	-	-	-
<b>Plant - Subtotal</b>	<b>(9,939,247)</b>	<b>(9,405,484)</b>	<b>(9,405,484)</b>	<b>(9,405,484)</b>	<b>(9,405,484)</b>	<b>(10,225,648)</b>
Deferred Gas Costs	-	-	-	-	-	-
Over Recoveries of PGA	-	-	-	-	-	-
PGA - Amended Item	-	-	-	-	-	-
<b>Gas Cost Adjustment - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
LGS - Goodwill Amortization	-	-	-	-	-	-
TXU - Goodwill Amortization	-	-	-	-	-	-
<b>Goodwill - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Customer Advances	-	-	-	-	-	-
Capital Loss CarryForward	-	-	-	-	-	-
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	(2,176,535)	(2,147,929)	(2,147,929)	(2,147,929)	(2,147,929)	(2,105,759)
DIG on Fixed Assets	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	-	-	-	-	-	-
DIG on Fixed Assets - WKG	-	-	-	-	-	-
Leases - Liabilities	2,176,535	2,147,929	2,147,929	2,147,929	2,147,929	2,105,759

**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024
	5/31/2024	6/30/2024	6/30/2024	7/31/2024	8/31/2024	9/30/2024
Leases Reclass - Liabilities	-	-	-	-	-	-
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	-	-	-	-	-	-
Industrial Contracts	-	-	-	-	-	-
Linder - Partnership Investment	-	-	-	-	-	-
UNICAP Section 263A Costs	-	-	-	-	-	-
481(a) UNICAP	-	-	-	-	-	-
UNICAP - IRS Audit	-	-	-	-	-	-
Allowance for Doubtful Accounts	-	-	-	-	-	-
Clearing Account - Adjustment	-	-	-	-	-	-
Charitable Contribution Carryover	11,720	12,851	12,851	12,851	12,851	10,248
RAR CFWE 1990-1985	-	-	-	-	-	-
Contributed Contracts	-	-	-	-	-	-
Book Inc Recognized for MTM Acctg	-	-	-	-	-	-
RAR Amortization of Non-Compete	-	-	-	-	-	-
Union Gas - Non Compete	-	-	-	-	-	-
Monarch - Non Compete	-	-	-	-	-	-
Palmyra - Non Compete	-	-	-	-	-	-
Duke - Purchased Contracts	-	-	-	-	-	-
Prepayments	600,288	777,911	777,911	777,911	777,911	1,308,304
Rate Case Accrual	-	-	-	-	-	-
Research and Development Expenses	-	-	-	-	-	-
Partnership Investment - Unitary	-	-	-	-	-	-
IGS - Purchased Contracts	-	-	-	-	-	-
Inventory Adjustment	-	-	-	-	-	-
Stock Option Expense	-	-	-	-	-	-
Prepayments - MVG	-	-	-	-	-	-
WACOG to FIFO Adjustment	-	-	-	-	-	-
Tax Free Interest - Temp	-	-	-	-	-	-
Federal & State Tax Interest	-	-	-	-	-	-
Prepayments - IRS Audits	-	-	-	-	-	-
Impairment - Atmos Gathering LLC	-	-	-	-	-	-
VA Charitable Contributions	-	-	-	-	-	-
Reg Asset Benefit Accrual	-	-	-	-	-	-
TX Rule 8.209 Reg Asset Deferral	-	-	-	-	-	-
LA SIIP Reg Asset	-	-	-	-	-	-
TN Reg Asset Deferral	-	-	-	-	-	-
Intra Period Tax Allocation	(4,765)	2,037	2,037	2,037	2,037	-
Regulatory Asset - LGS Amortization	-	-	-	-	-	-
AFUDC - Equity Gross-Up	-	-	-	-	-	-
Regulatory Asset - Mid Tex	-	-	-	-	-	-
Regulatory Asset - Winter Weather Event	-	-	-	-	-	-
Regulatory Liability - Atmos 109	-	-	-	-	-	-
Reg Liability - Pension & OPEB asset	-	-	-	-	-	-
Regulatory Liability - GGC 109	-	-	-	-	-	-
Regulatory Liability - UCGC 109	-	-	-	-	-	-
Regulatory Liability - UCGC Rate	-	-	-	-	-	-
Regulatory Liability - 2017 Gross Up	-	-	-	-	-	-
Regulatory Liability - KY GUD	-	-	-	-	-	-
Regulatory Liability - NSC	(3,997)	(3,360)	(3,360)	(3,360)	(3,360)	(2,360)
Fuel Cell ITC	-	-	-	-	-	-
Regulatory Liability - LA - Hurricane Ida	-	-	-	-	-	-
Regulatory Liability - LA	-	-	-	-	-	-
CNG Tax Credit	-	-	-	-	-	-

**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Fiscal 2024		Fiscal 2024			
	5/31/2024	6/30/2024	6/30/2024	7/31/2024	8/31/2024	9/30/2024
<b>Other - Subtotal</b>	<b>603,246</b>	<b>789,439</b>	<b>789,439</b>	<b>789,439</b>	<b>789,439</b>	<b>1,316,192</b>
FD-NOL Credit Carryforward - Non Reg	-	-	-	-	-	-
FD-NOL Credit Carryforward - Utility	-	-	-	-	-	-
FD-NOL Credit Carryforward - Other	-	-	-	-	-	-
ST-State Net Operating Loss	-	-	-	-	-	-
ST-State Bonus Depreciation	-	-	-	-	-	-
FD-FAS 115 Adjustment	-	-	-	-	-	-
FD-Treasury Lock Adjustment	-	-	-	-	-	-
FD-Other	-	-	-	-	-	-
FD-Federal Benefit on State Bonus	-	-	-	-	-	-
FD-Federal Benefit on State NOL	-	-	-	-	-	-
FD-Fuel Cell Credit	-	-	-	-	-	-
State Texas Margin WWE DTL	-	-	-	-	-	-
ST-Other	-	-	-	-	-	-
ST - Valuation Allow on State NOL	-	-	-	-	-	-
FD - Valuation on Fed Tax of St NO	-	-	-	-	-	-
FD-FAS 158 Measurement Date Change	-	-	-	-	-	-
FD-AMT Minimum Tax Credit	-	-	-	-	-	-
ST- Valuation Allow Enterprise Zone ITC	-	-	-	-	-	-
FD- Valuation Allow Fed Tax Enterprise Zone ITC	-	-	-	-	-	-
ST-Enterprise Zone ITC	-	-	-	-	-	-
STATE NOL_FIN48	-	-	-	-	-	-
STATE NOL_FIN48 TN	-	-	-	-	-	-
FD-Treasury Lock Adjustment-Realized	-	-	-	-	-	-
FD-Treasury Lock Adjustment-Unrealized	-	-	-	-	-	-
FD -Federal Tax on Enterprise ITC	-	-	-	-	-	-
<b>Other Tax Effected Items - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total Accumulated Deferred Income Tax</b>	<b><u>(11,366,922)</u></b>	<b><u>(10,661,552)</u></b>	<b><u>(10,661,552)</u></b>	<b><u>(10,661,552)</u></b>	<b><u>(10,661,552)</u></b>	<b><u>(10,383,728)</u></b>
			<b><u>(10,661,552)</u></b>	<b><u>(10,661,552)</u></b>	<b><u>(10,661,552)</u></b>	<b><u>(10,383,728)</u></b>

	(39,651)	1,072,375
	-	-
	-	-
	-	-



Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Category	Adj Code	Fiscal 2021	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022
			9/30/2021	10/31/2021	11/30/2021	12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022
Environmental Activities	ACC	ACC01	-	-	-	-	-	-	-	-	-	-	-	-	-
Ad Valorem Taxes	ACC	ACC02	-	-	-	-	-	-	-	-	-	-	-	-	-
Directors Deferred Bonus	ACC	ACC03	-	-	-	-	-	-	-	-	-	-	-	-	-
MIP/VPP Accrual	Excl	ACC04	331,396	331,396	331,396	344,082	344,082	344,082	356,838	356,838	356,838	369,744	369,744	369,744	325,429
Accrued Environmental Asset	ACC	ACC05	-	-	-	-	-	-	-	-	-	-	-	-	-
Miscellaneous Accrued	ACC	ACC06	-	-	-	-	-	-	-	-	-	-	-	-	-
Self Insurance - Adjustment	ACC	ACC08	-	-	-	-	-	-	-	-	-	-	-	-	-
Vacation Accrual	ACC	ACC11	98,271	98,271	98,271	98,254	98,254	98,254	98,258	98,258	98,258	98,301	98,301	98,301	99,204
Worker's Comp Insurance Reserve	ACC	ACC12	(51,585)	(51,585)	(51,585)	(54,446)	(54,446)	(54,446)	(79,481)	(79,481)	(79,481)	(86,240)	(86,240)	(86,240)	(104,128)
<b>Accrual - Subtotal</b>			<b>378,082</b>	<b>378,082</b>	<b>378,082</b>	<b>387,890</b>	<b>387,890</b>	<b>387,890</b>	<b>375,615</b>	<b>375,615</b>	<b>375,615</b>	<b>381,805</b>	<b>381,805</b>	<b>381,805</b>	<b>320,505</b>
Rabbi Trust - True Up		BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
SEBP Adjustment	Excl	BEN	1,014,325	1,014,325	1,014,325	1,013,442	1,013,442	1,013,442	1,012,417	1,012,417	1,012,417	1,011,801	1,011,801	1,011,801	1,010,204
SERP DTL Offset	Excl	BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock Grant Plan	Excl	BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust		BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
VEBA Trust Contribution Adjustment		BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock - MIP		BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
Director's Stock Awards		BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
Director's Stock - Temp		BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Book Gain or Loss		BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Tax Gain or Loss		BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Unrealized Gain or Loss		BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
Pension Expense		BEN	-	-	-	-	-	-	-	-	-	-	-	-	-
FAS106 Adjustment		BEN	(4,262,009)	(4,262,009)	(4,262,009)	(3,515,440)	(3,515,440)	(3,515,440)	(3,892,260)	(3,892,260)	(3,892,260)	(4,237,703)	(4,237,703)	(4,237,703)	(4,729,631)
<b>Benefits - Subtotal</b>			<b>(3,247,684)</b>	<b>(3,247,684)</b>	<b>(3,247,684)</b>	<b>(2,501,998)</b>	<b>(2,501,998)</b>	<b>(2,501,998)</b>	<b>(2,879,843)</b>	<b>(2,879,843)</b>	<b>(2,879,843)</b>	<b>(3,225,902)</b>	<b>(3,225,902)</b>	<b>(3,225,902)</b>	<b>(3,719,427)</b>
CWIP	Excl	CWIP/RWIP	(126,936)	(126,936)	(126,936)	(126,914)	(126,914)	(126,914)	(126,919)	(126,919)	(126,919)	(126,975)	(126,975)	(126,975)	(126,943)
RWIP	Excl	CWIP/RWIP	(107)	(107)	(107)	(107)	(107)	(107)	(107)	(107)	(107)	(107)	(107)	(107)	(1)
<b>CWIP/RWIP - Subtotal</b>			<b>(127,043)</b>	<b>(127,043)</b>	<b>(127,043)</b>	<b>(127,021)</b>	<b>(127,021)</b>	<b>(127,021)</b>	<b>(127,026)</b>	<b>(127,026)</b>	<b>(127,026)</b>	<b>(127,082)</b>	<b>(127,082)</b>	<b>(127,082)</b>	<b>(126,944)</b>
Fixed Asset Cost Adjustment		FXA	(1,090,547)	(1,090,547)	(1,090,547)	(1,090,420)	(1,090,420)	(1,090,420)	(1,091,948)	(1,091,948)	(1,091,948)	(1,092,490)	(1,092,490)	(1,092,490)	(959,665)
Depreciation Adjustment		FXA	349,179	349,179	349,179	347,061	347,061	347,061	344,925	344,925	344,925	343,661	343,661	343,661	241,311
Book Gain/Loss on Sale of Fixed Assets		FXA	-	-	-	-	-	-	-	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets		FXA	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Cushion Gas		FXA	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Line Pack Gas		FXA	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Cost		FXA	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Accum		FXA	-	-	-	-	-	-	-	-	-	-	-	-	-
Repair % Completion Allowance		FXA	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) TPR		FXA	-	-	-	-	-	-	-	-	-	-	-	-	-
Repairs Aggregation Sec 481(a) Adj		FXA	-	-	-	-	-	-	-	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj		FXA	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Plant - Subtotal</b>			<b>(741,368)</b>	<b>(741,368)</b>	<b>(741,368)</b>	<b>(743,359)</b>	<b>(743,359)</b>	<b>(743,359)</b>	<b>(747,023)</b>	<b>(747,023)</b>	<b>(747,023)</b>	<b>(748,829)</b>	<b>(748,829)</b>	<b>(748,829)</b>	<b>(718,354)</b>
Deferred Gas Costs	GCA	GCA01	-	-	-	-	-	-	-	-	-	-	-	-	-
Over Recoveries of PGA	GCA	GCA03	-	-	-	-	-	-	-	-	-	-	-	-	-
PGA - Amended Item	GCA	GCA04	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Gas Cost Adjustment - Subtotal</b>			-	-	-	-	-	-	-	-	-	-	-	-	-
LGS - Goodwill Amortization	GDW	ONT13	-	-	-	-	-	-	-	-	-	-	-	-	-
TXU - Goodwill Amortization	GDW	ONT49	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Goodwill - Subtotal</b>			-	-	-	-	-	-	-	-	-	-	-	-	-
Customer Advances	ONT	CAP01	-	-	-	-	-	-	-	-	-	-	-	-	-
Capital Loss CarryForward	ONT	CAP_LOSS_CF	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-13523	ONT	DTE01	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Expense Projects	ONT	DTE09	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-14155	ONT	DTE12	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Projects - TXU Acquisition	ONT	DTE14	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Amortized	ONT	DVA05	22,562	22,562	22,562	22,558	22,558	22,558	22,559	22,559	22,559	22,569	22,569	22,565	
RAR 91/93 Bond Cost Capitalized	ONT	DVA06	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Assets	ONT	DVA10	(1,480,631)	(1,480,631)	(1,480,631)	(1,438,090)	(1,438,090)	(1,438,090)	(1,381,877)	(1,381,877)	(1,381,877)	(1,318,838)	(1,318,838)	(1,318,838)	(1,232,790)
DIG on Fixed Assets	ONT	DVA16	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	ONT	DVA18	(810,599)	(810,599)	(810,599)	(810,460)	(810,460)	(810,460)	(810,490)	(810,490)	(810,490)	(810,848)	(810,848)	(810,848)	(810,703)
DIG on Fixed Assets - WKG	ONT	DVA19	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Liabilities	ONT	DVA20	1,480,631	1,480,631	1,480,631	1,438,090	1,438,090	1,438,090	1,381,877	1,381,877	1,381,877	1,318,838	1,318,838	1,318,838	1,232,790



**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Category	Adj Code	Fiscal 2021	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022	Fiscal 2022
			9/30/2021	10/31/2021	11/30/2021	12/31/2021	1/31/2022	2/28/2022	3/31/2022	4/30/2022	5/31/2022	6/30/2022	7/31/2022	8/31/2022	9/30/2022	
<b>Other - Subtotal</b>			263,469	263,469	263,469	196,927	196,927	196,927	1,413,842	1,413,842	1,413,842	1,176,735	1,176,735	1,176,735	1,805,557	
FD-NOL Credit Carryforward - Non Reg	fed nol	TAX														
FD-NOL Credit Carryforward - Utility	fed nol	TAX														
FD-NOL Credit Carryforward - Other	fed nol	TAX														
ST-State Net Operating Loss	state	TAX														
ST-State Bonus Depreciation	state	TAX														
FD-FAS 115 Adjustment		TAX														
FD-Treasury Lock Adjustment		TAX														
FD-Other		TAX														
FD-Federal Benefit on State Bonus	state	TAX														
FD-Federal Benefit on State NOL	state	TAX														
FD-Fuel Cell Credit		TAX														
State Texas Margin WWE DTL		TAX														
ST-Other	state	TAX														
ST - Valuation Allow on State NOL	state	TAX														
FD - Valuation on Fed Tax of St NO		TAX														
FD-FAS 158 Measurement Date Change		TAX														
FD-AMT Minimum Tax Credit		TAX														
ST- Valuation Allow Enterprise Zone ITC	state	TAX														
FD- Valuation Allow Fed Tax Enterprise Zone ITC		TAX														
ST-Enterprise Zone ITC	state	TAX														
STATE NOL_FIN48	state	TAX														
STATE NOL_FIN48 TN	state	TAX														
FD-Treasury Lock Adjustment-Realized		TAX														
FD-Treasury Lock Adjustment-Unrealized		TAX														
FD -Federal Tax on Enterprise ITC		TAX														
<b>Other Tax Effected Items - Subtotal</b>			-	-	-	-	-	-	-	-	-	-	-	-	-	
<b>Total Accumulated Deferred Income Tax</b>			<u>(3,474,544)</u>	<u>(3,474,544)</u>	<u>(3,474,544)</u>	<u>(2,787,561)</u>	<u>(2,787,561)</u>	<u>(2,787,561)</u>	<u>(1,964,435)</u>	<u>(1,964,435)</u>	<u>(1,964,435)</u>	<u>(2,543,273)</u>	<u>(2,543,273)</u>	<u>(2,543,273)</u>	<u>(2,438,663)</u>	
			<u>(3,474,544)</u>	<u>(3,474,544)</u>	<u>(3,474,544)</u>	<u>(2,787,561)</u>	<u>(2,787,561)</u>	<u>(2,787,561)</u>	<u>(1,964,435)</u>	<u>(1,964,435)</u>	<u>(1,964,435)</u>	<u>(2,543,273)</u>	<u>(2,543,273)</u>	<u>(2,543,273)</u>	<u>(2,438,663)</u>	

Excluded	1,222,305	1,207,647
State Only	-	-
TCJA Reg Liab Related	-	-
Fed NOL	-	-

**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Fiscal 2023 10/31/2022	Fiscal 2023 11/30/2022	Fiscal 2023 12/31/2022	Fiscal 2023 1/31/2023	Fiscal 2023 2/28/2023	Fiscal 2023 3/31/2023	Fiscal 2023 4/30/2023	Fiscal 2023 5/31/2023	Fiscal 2023 6/30/2023	Fiscal 2023 7/31/2023	Fiscal 2023 8/31/2023	Fiscal 2023 9/30/2023	Fiscal 2024 10/31/2023	Fiscal 2024 11/30/2023	Fiscal 2024 12/31/2023	Fiscal 2024 1/31/2024	Fiscal 2024 2/29/2024	Fiscal 2024 3/31/2024	Fiscal 2024 4/30/2024
Environmental Activities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ad Valorem Taxes	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Directors Deferred Bonus	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MIP/VPP Accrual	325,429	325,429	311,957	311,957	311,957	298,613	298,613	298,613	285,296	285,296	285,296	396,122	396,122	396,122	405,946	405,946	405,946	415,738	415,738
Accrued Environmental Asset	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Miscellaneous Accrued	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Self Insurance - Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Vacation Accrual	99,204	99,204	99,181	99,181	99,181	99,198	99,198	99,198	99,227	99,227	99,227	97,281	97,281	97,281	97,293	97,293	97,293	97,297	97,297
Worker's Comp Insurance Reserve	(104,128)	(104,128)	(105,063)	(105,063)	(105,063)	(126,605)	(126,605)	(126,605)	(140,230)	(140,230)	(140,230)	(149,359)	(149,359)	(149,359)	(154,655)	(154,655)	(154,655)	(186,680)	(186,680)
<b>Accrual - Subtotal</b>	<b>320,505</b>	<b>320,505</b>	<b>306,075</b>	<b>306,075</b>	<b>306,075</b>	<b>271,206</b>	<b>271,206</b>	<b>271,206</b>	<b>244,293</b>	<b>244,293</b>	<b>244,293</b>	<b>344,044</b>	<b>344,044</b>	<b>344,044</b>	<b>348,584</b>	<b>348,584</b>	<b>348,584</b>	<b>326,355</b>	<b>326,355</b>
Rabbi Trust - True Up	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SEBP Adjustment	1,010,204	1,010,204	1,009,647	1,009,647	1,009,647	1,009,626	1,009,626	1,009,626	1,010,310	1,010,310	1,010,310	1,011,675	1,011,675	1,011,675	1,011,495	1,011,495	1,011,495	972,930	972,930
SERP DTL Offset	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock Grant Plan	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
VEBA Trust Contribution Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Restricted Stock - MIP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Director's Stock Awards	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Director's Stock - Temp	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Book Gain or Loss	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Tax Gain or Loss	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Rabbi Trust Unrealized Gain or Loss	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pension Expense	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FAS106 Adjustment	(4,729,631)	(4,729,631)	(4,953,608)	(4,953,608)	(4,953,608)	(5,310,861)	(5,310,861)	(5,310,861)	(5,698,517)	(5,698,517)	(5,698,517)	(6,937,121)	(6,937,121)	(6,937,121)	(7,227,186)	(7,227,186)	(7,227,186)	(7,781,845)	(7,781,845)
<b>Benefits - Subtotal</b>	<b>(3,719,427)</b>	<b>(3,719,427)</b>	<b>(3,943,961)</b>	<b>(3,943,961)</b>	<b>(3,943,961)</b>	<b>(4,301,235)</b>	<b>(4,301,235)</b>	<b>(4,301,235)</b>	<b>(4,688,207)</b>	<b>(4,688,207)</b>	<b>(4,688,207)</b>	<b>(5,925,446)</b>	<b>(5,925,446)</b>	<b>(5,925,446)</b>	<b>(6,215,691)</b>	<b>(6,215,691)</b>	<b>(6,215,691)</b>	<b>(6,808,915)</b>	<b>(6,808,915)</b>
CWIP	(126,943)	(126,943)	(126,913)	(126,913)	(126,913)	(126,936)	(126,936)	(126,936)	(126,973)	(126,973)	(126,973)	(127,089)	(127,089)	(127,089)	(127,104)	(127,104)	(127,104)	(127,110)	(127,110)
RWIP	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(107)	(107)	(107)	(107)	(107)	(107)	(107)	(107)
<b>CWIP/RWIP - Subtotal</b>	<b>(126,944)</b>	<b>(126,944)</b>	<b>(126,914)</b>	<b>(126,914)</b>	<b>(126,914)</b>	<b>(126,937)</b>	<b>(126,937)</b>	<b>(126,937)</b>	<b>(126,974)</b>	<b>(126,974)</b>	<b>(126,974)</b>	<b>(127,196)</b>	<b>(127,196)</b>	<b>(127,196)</b>	<b>(127,211)</b>	<b>(127,211)</b>	<b>(127,211)</b>	<b>(127,217)</b>	<b>(127,217)</b>
Fixed Asset Cost Adjustment	(959,665)	(959,665)	(959,443)	(959,443)	(959,443)	(959,614)	(959,614)	(959,614)	(959,893)	(959,893)	(959,893)	(960,698)	(960,698)	(960,698)	(960,818)	(960,818)	(960,818)	(960,857)	(960,857)
Depreciation Adjustment	241,311	241,311	239,698	239,698	239,698	238,096	238,096	238,096	236,520	236,520	236,520	268,197	268,197	268,197	266,830	266,830	266,830	265,436	265,436
Book Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Cushion Gas	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) Line Pack Gas	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Cost	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IRS Audit Assessment - Accum	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repair % Completion Allowance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Section 481(a) TPR	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repairs Aggregation Sec 481(a) Adj	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Plant - Subtotal</b>	<b>(718,354)</b>	<b>(718,354)</b>	<b>(719,745)</b>	<b>(719,745)</b>	<b>(719,745)</b>	<b>(721,518)</b>	<b>(721,518)</b>	<b>(721,518)</b>	<b>(723,373)</b>	<b>(723,373)</b>	<b>(723,373)</b>	<b>(692,501)</b>	<b>(692,501)</b>	<b>(692,501)</b>	<b>(693,988)</b>	<b>(693,988)</b>	<b>(693,988)</b>	<b>(695,421)</b>	<b>(695,421)</b>
Deferred Gas Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Over Recoveries of PGA	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PGA - Amended Item	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Gas Cost Adjustment - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
LGS - Goodwill Amortization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TXU - Goodwill Amortization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Goodwill - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Customer Advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Capital Loss CarryForward	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-13523	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Expense Projects	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Amortization - LGS Acq. 1810-14155	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deferred Projects - TXU Acquisition	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RAR 91/93 Bond Cost Amortized	22,565	22,565	22,559	22,559	22,559	22,563	22,563	22,563	22,570	22,570	22,570	22,589	22,589	22,589	22,592	22,592	22,592	22,593	22,593
RAR 91/93 Bond Cost Capitalized	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Assets	(1,232,790)	(1,232,790)	(1,189,253)	(1,189,253)	(1,189,253)	(1,124,343)	(1,124,343)	(1,124,343)	(1,060,125)	(1,060,125)	(1,060,125)	(1,008,700)	(1,008,700)	(1,008,700)	(1,285,194)	(1,285,194)	(1,285,194)	(1,691,344)	(1,691,344)
DIG on Fixed Assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	(810,703)	(810,703)	(810,516)	(810,516)	(810,516)	(810,660)	(810,660)	(810,660)	(810,896)	(810,896)	(810,896)	(811,576)	(811,576)	(811,576)	(811,677)	(811,677)	(811,677)	(811,710)	(811,710)
DIG on Fixed Assets - WKG	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Leases - Liabilities	1,232,790	1,232,790	1,189,253	1,189,253	1,189,253	1,124,343	1,124,343	1,124,343	1,060,125	1,060,125	1,060,125	1,008,700	1,008,700	1,008,700	1,285,194	1,285,194	1,285,194	1,691,344	1,691,344



Atmos Energy Corporation, Inc.  
Accumulated Deferred Income Taxes

Adjustment Description	Fiscal 2023 10/31/2022	Fiscal 2023 11/30/2022	Fiscal 2023 12/31/2022	Fiscal 2023 1/31/2023	Fiscal 2023 2/28/2023	Fiscal 2023 3/31/2023	Fiscal 2023 4/30/2023	Fiscal 2023 5/31/2023	Fiscal 2023 6/30/2023	Fiscal 2023 7/31/2023	Fiscal 2023 8/31/2023	Fiscal 2023 9/30/2023	Fiscal 2024 10/31/2023	Fiscal 2024 11/30/2023	Fiscal 2024 12/31/2023	Fiscal 2024 1/31/2024	Fiscal 2024 2/29/2024	Fiscal 2024 3/31/2024	Fiscal 2024 4/30/2024
<b>Other - Subtotal</b>	1,805,557	1,805,557	2,278,482	2,278,482	2,278,482	2,634,778	2,634,778	2,634,778	2,957,454	2,957,454	2,957,454	1,841,271	1,841,271	1,841,271	1,295,343	1,295,343	1,295,343	(249,097)	(249,097)
FD-NOL Credit Carryforward - Non Reg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-NOL Credit Carryforward - Utility	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-NOL Credit Carryforward - Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ST-State Net Operating Loss	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ST-State Bonus Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-FAS 115 Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Treasury Lock Adjustment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Federal Benefit on State Bonus	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Federal Benefit on State NOL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Fuel Cell Credit	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
State Texas Margin WWE DTL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ST-Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ST - Valuation Allow on State NOL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD - Valuation on Fed Tax of St NO	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-FAS 158 Measurement Date Change	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-AMT Minimum Tax Credit	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ST- Valuation Allow Enterprise Zone ITC	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD- Valuation Allow Fed Tax Enterprise Zone ITC	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ST-Enterprise Zone ITC	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
STATE NOL_FIN48	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
STATE NOL_FIN48 TN	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Treasury Lock Adjustment-Realized	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD-Treasury Lock Adjustment-Unrealized	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FD -Federal Tax on Enterprise ITC	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Other Tax Effected Items - Subtotal</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total Accumulated Deferred Income Tax</b>	<b>(2,438,663)</b>	<b>(2,438,663)</b>	<b>(2,206,063)</b>	<b>(2,206,063)</b>	<b>(2,206,063)</b>	<b>(2,243,706)</b>	<b>(2,243,706)</b>	<b>(2,243,706)</b>	<b>(2,336,807)</b>	<b>(2,336,807)</b>	<b>(2,336,807)</b>	<b>(4,559,828)</b>	<b>(4,559,828)</b>	<b>(4,559,828)</b>	<b>(5,392,963)</b>	<b>(5,392,963)</b>	<b>(5,392,963)</b>	<b>(7,554,295)</b>	<b>(7,554,295)</b>
	<b>(2,438,663)</b>	<b>(2,438,663)</b>	<b>(2,206,063)</b>	<b>(2,206,063)</b>	<b>(2,206,063)</b>	<b>(2,243,706)</b>	<b>(2,243,706)</b>	<b>(2,243,706)</b>	<b>(2,336,811)</b>	<b>(2,336,811)</b>	<b>(2,336,811)</b>	<b>(4,559,829)</b>	<b>(4,559,828)</b>	<b>(4,559,828)</b>	<b>(5,392,963)</b>	<b>(5,392,963)</b>	<b>(5,392,963)</b>	<b>(7,554,295)</b>	<b>(7,554,295)</b>

1,269,016

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**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024
	5/31/2024	6/30/2024	6/30/2024	7/31/2024	8/31/2024	9/30/2024
Environmental Activities	-	-	-	-	-	-
Ad Valorem Taxes	-	-	-	-	-	-
Directors Deferred Bonus	-	-	-	-	-	-
MIP/VPP Accrual	415,738	425,513	425,513	425,513	425,513	577,788
Accrued Environmental Asset	-	-	-	-	-	-
Miscellaneous Accrued	-	-	-	-	-	-
Self Insurance - Adjustment	-	-	-	-	-	-
Vacation Accrual	97,297	97,297	97,297	97,297	97,297	95,728
Worker's Comp Insurance Reserve	(186,680)	(198,279)	(198,279)	(198,279)	(198,279)	(204,844)
<b>Accrual - Subtotal</b>	<b>326,355</b>	<b>324,531</b>	<b>324,531</b>	<b>324,531</b>	<b>324,531</b>	<b>468,672</b>
Rabbi Trust - True Up	-	-	-	-	-	-
SEBP Adjustment	972,930	972,463	972,463	972,463	972,463	972,526
SERP DTL Offset	-	-	-	-	-	-
Restricted Stock Grant Plan	-	-	-	-	-	-
Rabbi Trust	-	-	-	-	-	-
VEBA Trust Contribution Adjustment	-	-	-	-	-	-
Restricted Stock - MIP	-	-	-	-	-	-
Director's Stock Awards	-	-	-	-	-	-
Director's Stock - Temp	-	-	-	-	-	-
Rabbi Trust Book Gain or Loss	-	-	-	-	-	-
Rabbi Trust Tax Gain or Loss	-	-	-	-	-	-
Rabbi Trust Unrealized Gain or Loss	-	-	-	-	-	-
Pension Expense	-	-	-	-	-	-
FAS106 Adjustment	(7,781,845)	(8,357,208)	(8,357,208)	(8,357,208)	(8,357,208)	(8,131,615)
<b>Benefits - Subtotal</b>	<b>(6,808,915)</b>	<b>(7,384,745)</b>	<b>(7,384,745)</b>	<b>(7,384,745)</b>	<b>(7,384,745)</b>	<b>(7,159,089)</b>
CWIP	(127,110)	(127,110)	(127,110)	(127,110)	(127,110)	(127,189)
RWIP	(107)	(107)	(107)	(107)	(107)	(107)
<b>CWIP/RWIP - Subtotal</b>	<b>(127,217)</b>	<b>(127,217)</b>	<b>(127,217)</b>	<b>(127,217)</b>	<b>(127,217)</b>	<b>(127,296)</b>
Fixed Asset Cost Adjustment	(960,857)	(960,857)	(960,857)	(960,857)	(960,857)	(915,338)
Depreciation Adjustment	265,436	264,005	264,005	264,005	264,005	247,991
Book Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-
Tax Gain/Loss on Sale of Fixed Assets	-	-	-	-	-	-
Section 481(a) Cushion Gas	-	-	-	-	-	-
Section 481(a) Line Pack Gas	-	-	-	-	-	-
IRS Audit Assessment - Cost	-	-	-	-	-	-
IRS Audit Assessment - Accum	-	-	-	-	-	-
Repair % Completion Allowance	-	-	-	-	-	-
Section 481(a) TPR	-	-	-	-	-	-
Repairs Aggregation Sec 481(a) Adj	-	-	-	-	-	-
AFUDC - Equity Asset Cost Adj	-	-	-	-	-	-
<b>Plant - Subtotal</b>	<b>(695,421)</b>	<b>(696,852)</b>	<b>(696,852)</b>	<b>(696,852)</b>	<b>(696,852)</b>	<b>(667,347)</b>
Deferred Gas Costs	-	-	-	-	-	-
Over Recoveries of PGA	-	-	-	-	-	-
PGA - Amended Item	-	-	-	-	-	-
<b>Gas Cost Adjustment - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
LGS - Goodwill Amortization	-	-	-	-	-	-
TXU - Goodwill Amortization	-	-	-	-	-	-
<b>Goodwill - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Customer Advances	-	-	-	-	-	-
Capital Loss CarryForward	-	-	-	-	-	-
Amortization - LGS Acq. 1810-13523	-	-	-	-	-	-
Deferred Expense Projects	-	-	-	-	-	-
Amortization - LGS Acq. 1810-14155	-	-	-	-	-	-
Deferred Projects - TXU Acquisition	-	-	-	-	-	-
RAR 91/93 Bond Cost Amortized	22,593	22,593	22,593	22,593	22,593	22,607
RAR 91/93 Bond Cost Capitalized	-	-	-	-	-	-
Leases - Assets	(1,691,344)	(1,650,384)	(1,650,384)	(1,650,384)	(1,650,384)	(1,579,732)
DIG on Fixed Assets	-	-	-	-	-	-
DIG on Fixed Assets - UCG Storage	(811,710)	(811,710)	(811,710)	(811,710)	(811,710)	(812,218)
DIG on Fixed Assets - WKG	-	-	-	-	-	-
Leases - Liabilities	1,691,344	1,650,384	1,650,384	1,650,384	1,650,384	1,579,732

**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024
	5/31/2024	6/30/2024	6/30/2024	7/31/2024	8/31/2024	9/30/2024
Leases Reclass - Liabilities	-	-	-	-	-	-
RAR 86/90 Lease Expense Amortiz.	(120,950)	(120,950)	(120,950)	(120,950)	(120,950)	(121,026)
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	-	-	-	-	-	-
Industrial Contracts	-	-	-	-	-	-
Linder - Partnership Investment	-	-	-	-	-	-
UNICAP Section 263A Costs	1,316,197	1,316,197	1,316,197	1,316,197	1,316,197	932,287
481(a) UNICAP	-	-	-	-	-	-
UNICAP - IRS Audit	-	-	-	-	-	-
Allowance for Doubtful Accounts	48,543	70,600	70,600	70,600	70,600	94,335
Clearing Account - Adjustment	-	-	-	-	-	-
Charitable Contribution Carryover	493	493	493	493	493	404
RAR CFWE 1990-1985	-	-	-	-	-	-
Contributed Contracts	-	-	-	-	-	-
Book Inc Recognized for MTM Acctg	-	-	-	-	-	-
RAR Amortization of Non-Compete	-	-	-	-	-	-
Union Gas - Non Compete	282,311	282,311	282,311	282,311	282,311	282,487
Monarch - Non Compete	-	-	-	-	-	-
Palmyra - Non Compete	-	-	-	-	-	-
Duke - Purchased Contracts	-	-	-	-	-	-
Prepayments	1,070	4,993	4,993	4,993	4,993	(17,201)
Rate Case Accrual	-	-	-	-	-	-
Research and Development Expenses	-	-	-	-	-	-
Partnership Investment - Unitary	-	-	-	-	-	-
IGS - Purchased Contracts	-	-	-	-	-	-
Inventory Adjustment	-	-	-	-	-	-
Stock Option Expense	-	-	-	-	-	-
Prepayments - MVG	-	-	-	-	-	-
WACOG to FIFO Adjustment	(1,026,265)	(1,321,585)	(1,321,585)	(1,321,585)	(1,321,585)	(2,231,063)
Tax Free Interest - Temp	-	-	-	-	-	-
Federal & State Tax Interest	-	-	-	-	-	-
Prepayments - IRS Audits	-	-	-	-	-	-
Impairment - Atmos Gathering LLC	-	-	-	-	-	-
VA Charitable Contributions	-	-	-	-	-	-
Reg Asset Benefit Accrual	-	-	-	-	-	-
TX Rule 8.209 Reg Asset Deferral	-	-	-	-	-	-
LA SIIP Reg Asset	-	-	-	-	-	-
TN Reg Asset Deferral	-	-	-	-	-	-
Intra Period Tax Allocation	30,379	42,981	42,981	42,981	42,981	-
Regulatory Asset - LGS Amortization	-	-	-	-	-	-
AFUDC - Equity Gross-Up	-	-	-	-	-	-
Regulatory Asset - Mid Tex	-	-	-	-	-	-
Regulatory Asset - Winter Weather Event	-	-	-	-	-	-
Regulatory Liability - Atmos 109	-	-	-	-	-	-
Reg Liability - Pension & OPEB asset	-	-	-	-	-	-
Regulatory Liability - GGC 109	-	-	-	-	-	-
Regulatory Liability - UCGC 109	-	-	-	-	-	-
Regulatory Liability - UCGC Rate	-	-	-	-	-	-
Regulatory Liability - 2017 Gross Up	-	-	-	-	-	-
Regulatory Liability - KY GUD	-	-	-	-	-	-
Regulatory Liability - NSC	8,242	8,242	8,242	8,242	8,242	8,247
Fuel Cell ITC	-	-	-	-	-	-
Regulatory Liability - LA - Hurricane Ida	-	-	-	-	-	-
Regulatory Liability - LA	-	-	-	-	-	-
CNG Tax Credit	-	-	-	-	-	-



**Atmos Energy Corporation, Inc.**  
**Accumulated Deferred Income Taxes**

Adjustment Description	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024	Fiscal 2024
	5/31/2024	6/30/2024	6/30/2024	7/31/2024	8/31/2024	9/30/2024
<b>Other - Subtotal</b>	<b>(249,097)</b>	<b>(505,835)</b>	<b>(505,835)</b>	<b>(505,835)</b>	<b>(505,835)</b>	<b>(1,841,141)</b>
FD-NOL Credit Carryforward - Non Reg	-	-	-	-	-	-
FD-NOL Credit Carryforward - Utility	-	-	-	-	-	-
FD-NOL Credit Carryforward - Other	-	-	-	-	-	-
ST-State Net Operating Loss	-	-	-	-	-	-
ST-State Bonus Depreciation	-	-	-	-	-	-
FD-FAS 115 Adjustment	-	-	-	-	-	-
FD-Treasury Lock Adjustment	-	-	-	-	-	-
FD-Other	-	-	-	-	-	-
FD-Federal Benefit on State Bonus	-	-	-	-	-	-
FD-Federal Benefit on State NOL	-	-	-	-	-	-
FD-Fuel Cell Credit	-	-	-	-	-	-
State Texas Margin WWE DTL	-	-	-	-	-	-
ST-Other	-	-	-	-	-	-
ST - Valuation Allow on State NOL	-	-	-	-	-	-
FD - Valuation on Fed Tax of St NO	-	-	-	-	-	-
FD-FAS 158 Measurement Date Change	-	-	-	-	-	-
FD-AMT Minimum Tax Credit	-	-	-	-	-	-
ST- Valuation Allow Enterprise Zone ITC	-	-	-	-	-	-
FD- Valuation Allow Fed Tax Enterprise Zone ITC	-	-	-	-	-	-
ST-Enterprise Zone ITC	-	-	-	-	-	-
STATE NOL_FIN48	-	-	-	-	-	-
STATE NOL_FIN48 TN	-	-	-	-	-	-
FD-Treasury Lock Adjustment-Realized	-	-	-	-	-	-
FD-Treasury Lock Adjustment-Unrealized	-	-	-	-	-	-
FD -Federal Tax on Enterprise ITC	-	-	-	-	-	-
<b>Other Tax Effected Items - Subtotal</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total Accumulated Deferred Income Tax</b>	<b><u>(7,554,295)</u></b>	<b><u>(8,390,118)</u></b>	<b><u>(8,390,118)</u></b>	<b><u>(8,390,118)</u></b>	<b><u>(8,390,118)</u></b>	<b><u>(9,326,201)</u></b>
		1,276,245				1,406,221
		-				-
		-				-
		-				-



## Atmos Energy Corporation

### Income Statements

For the Month Ended YTD September, 2024

<b>Company</b>				
	Fiscal 2024 YTD September	Fiscal 2024 YTD June	Fiscal 2023 YTD September	Fiscal 2022 YTD September
<b>Operating Revenue</b>				
Total Gas Revenue	137,770,845	118,546,242	206,773,798	180,044,786
Transportation Revenue	21,219,804	16,487,393	20,852,819	19,523,879
Forfeited Discounts	125,934	99,447	(7)	(198)
Other Operating Revenue	58,341	47,616	45,251	216,180
Realized Gas Trading Margin	0	0	0	0
Unrealized Gas Trading Margin	0	0	0	0
Intersegment Revenue Elimination	0	0	0	0
<b>Total Operating Revenues</b>	<b>159,174,924</b>	<b>135,180,698</b>	<b>227,671,862</b>	<b>199,784,647</b>
Purchased Gas Cost	55,543,671	51,225,299	126,649,928	103,693,139
Intersegment Gas Cost Elimination	0	0	0	0
<b>Total Purchased Gas Costs</b>	<b>55,543,671</b>	<b>51,225,299</b>	<b>126,649,928</b>	<b>103,693,139</b>
<b>Contribution Margin</b>	<b>103,631,253</b>	<b>83,955,399</b>	<b>101,021,934</b>	<b>96,091,507</b>
<b>Operating Expenses</b>				
Total Operation & Maintenance Exp - Excl Bad Debt	32,335,983	22,719,594	31,422,280	29,733,337
Bad Debt Expense	1,187,654	1,307,423	871,146	711,048
Depreciation and Amortization	20,017,760	14,840,029	19,272,159	20,618,446
<b>Taxes-Other Than Income Taxes</b>				
Payroll Taxes	384,149	307,371	398,958	349,088
Ad Valorem	11,989,580	8,666,060	8,487,060	9,162,525
Franchise Taxes	7,500	828	1,113	1,116
State Gross Receipts	0	0	0	0
Others	1,162,380	861,895	1,074,896	1,062,803
<b>Total Taxes - Other Than Income Taxes</b>	<b>13,543,610</b>	<b>9,836,153</b>	<b>9,962,028</b>	<b>10,575,532</b>
<b>Total Operating Expenses</b>	<b>67,085,007</b>	<b>48,703,200</b>	<b>61,527,613</b>	<b>61,638,363</b>
<b>Operating Income (Loss)</b>	<b>36,546,246</b>	<b>35,252,199</b>	<b>39,494,320</b>	<b>34,453,144</b>
<b>Other Non-Operating Income/Expense</b>				
Interest Income	1,362,942	468,179	176,377	87,830
PBR	3,881,074	2,779,011	3,137,416	4,173,276
Others Income	575,911	338,218	783,586	949,974
<b>Total Non-Operating Income</b>	<b>5,819,928</b>	<b>3,585,408</b>	<b>4,097,380</b>	<b>5,211,080</b>
Long Term Interest Expenses	11,168,798	8,248,390	10,406,565	10,100,848
Short Term Interest Expenses	162,676	150,379	184,442	(17,999)
Donations	1,417,191	809,645	617,240	1,161,800
Other Non-Operating Expense	(550,226)	(416,391)	(162,270)	593,191
<b>Total Non-Operating Expense</b>	<b>12,198,439</b>	<b>8,792,023</b>	<b>11,045,976</b>	<b>11,837,839</b>
Equity in Earnings	0	0	0	0
<b>Total Other Non-Operating Income/Expense</b>	<b>6,378,512</b>	<b>5,206,615</b>	<b>6,948,597</b>	<b>6,626,759</b>
<b>Income (Loss), Before Income Taxes</b>	<b>30,167,734</b>	<b>30,045,584</b>	<b>32,545,724</b>	<b>27,826,385</b>
<b>Provision (Benefit) for Income Taxes</b>				
Current Federal Income Tax	3,282,169	1,302,179	8,484,954	(7,467,226)
Current State Income Tax	355,663	(392,189)	812,522	(3,680,699)
Deferred Federal Income Tax	(3,791,963)	(1,444,379)	(8,369,127)	9,471,086
Deferred State Income Tax	277,376	1,283,137	(245,030)	8,003,557
Investment Tax Credits	0	0	0	0
<b>Total Provision (Benefit) for Inc Tax</b>	<b>123,245</b>	<b>748,748</b>	<b>683,319</b>	<b>6,326,718</b>
<b>Income (Loss), Before Cumulative Effect</b>	<b>30,044,489</b>	<b>29,296,836</b>	<b>31,862,405</b>	<b>21,499,667</b>
Cumulative Effect of Acct Change, Net of Tax	0	0	0	0
<b>Income Statement - Net Income (Loss)</b>	<b>30,044,489</b>	<b>29,296,836</b>	<b>31,862,405</b>	<b>21,499,667</b>

**EXHIBIT LK-7**

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 2**  
**Question No. 2-10**  
**Page 1 of 2**

**REQUEST:**

Refer to the Commission's Order dated Sept. 29, 2023, in Case No. 2023-00231 at 7-8 wherein the Commission states:

"Atmos's explanation of how the normalization rules would apply to its ADIT was also materially incomplete. The bulk of the ADIT liability that Atmos projected would be generated during its 2023 and 2024 fiscal years was booked in account FXA01 and represents book-tax differences in the original cost, or basis, of pipeline replacement projects arising from repair deductions made for tax but not book purposes." [Note: original footnote 20 from this Commission Order in Case No. 2023-00231 is pasted in below.]<sup>1</sup>

"Normalization rules only apply to ADIT arising from accelerated tax depreciation, and the IRS has specifically stated that normalization rules do not apply to ADIT associated with repair deductions. [Note: original footnote 21 from this Commission Order is pasted in below.]<sup>2</sup> Thus, the bulk of the ADIT generated in Atmos's 2023 and 2024 fiscal years would not be subject to normalization rules, and therefore, it would not be necessary to include NOL ADIT, if any, offsetting that ADIT liability to avoid a normalization violation."

- a. Confirm that the DTL related to the repair allowance deduction is not subject to the normalization rules. If denied, then provide all authoritative support relied on for your position and cite and provide a copy of each reference to the IRC of 1986, Treasury Regulations and/or all other authoritative support.
- b. Confirm that the repair allowance deductions are reflected in account FXA01. Identify and describe each other temporary differences that is reflected in account FXA01. In addition, describe the source of each temporary difference and how it was/is calculated. Further, confirm the Company's fixed asset system is sufficiently detailed that each of the temporary differences aggregated into FXA01 can be identified and quantified.
- c. Identify and describe each temporary difference that is reflected in account FXA02. In addition, describe the source of each temporary difference and how it was/is calculated, e.g., straight-line tax depreciation calculated on the tax basis. Further, confirm the Company's fixed asset system is sufficiently detailed that each of the temporary differences aggregated into FXA02 can be identified and quantified.

---

<sup>1</sup> Original footnote 20 from PSC order, 2023-00231: "See Application, Exhibit F, Lines 1-10 (reflecting the connection between ADIT liability and plant additions in the relevant period); Application, Exhibit F-1, Lines 2-22 (reflecting the differences in the original book and tax bases and showing that they are due to expensing of repairs); see also Case No. 2022-00222, May 25, 2023 Order at 5, FN 19 (discussing how Atmos acknowledged that FXA01 only recorded differences arising from repair deductions)."

<sup>2</sup> Original footnote 21 from PSC order, 2023-00231: "See Private Letter Ruling 113227-19, 2020 WL 1071276 (issued Dec. 3, 2019) (finding, among other things, that book-tax timing differences arising from repairs, are not subject to normalization rules); see also 26 C.F.R. § 1.167(l)-1(h)(1)(i) (requiring a utility's reserve for deferred taxes to reflect the total amount of the deferral of federal income tax liability resulting from the taxpayer's use of accelerated depreciation); see also Case No. 2022-00222, May 25, 2023 Order at 5-6 (discussing how Atmos acknowledged that the repair deductions reflected in account FXA01 are not subject to normalization rules)."

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 2**  
**Question No. 2-10**  
**Page 2 of 2**

**RESPONSE:**

- a. The Company confirms the DTL related to the repair deduction is not subject to the normalization rules.
- b. The Company confirms the repair allowance deductions are reflected in ADIT account description FXA01. The following basis adjustments are also reflected in ADIT account descriptions FXA01,
  - i. FXA07 Aid in Construction
    - 1. Aid in construction represents payments received by the Company to aid in the constructions or improvements of the company's facilities. For income tax purposes these payments are treated as taxable.
  - ii. FXA09 Capitalized interest
    - 1. Capitalized interest represents the cost of borrowing funds for the construction of assets. The temporary difference arises as a result of the different methodologies for calculating the interest for book purposes under GAAP versus calculating for income tax under the IRC.
  - iii. FXA10 Capitalized overhead
    - 1. Capitalized overhead represents the capitalization of overhead expenses as it relates to the construction of assets. The temporary difference arises as a result of the different methodologies for calculating the Overhead for book purposes under GAAP versus calculating for income tax under the IRC.
  - iv. FXA80 AFUDC Equity
    - 1. AFUDC Equity represents basis for GAAP/Book purposes however, is not taxable under IRC and therefore does not give rise to tax basis.

The Company's fixed asset system is at the level of detail required to identify and quantify the cumulative tax deduction. However, the net timing difference cannot be bifurcated. Therefore, at any point in time, the sum of ADIT for FXA01 and FXA02 provides the after-tax cumulative difference between the book basis of fixed assets and the tax basis of fixed assets.

- c. The temporary differences included in FXA02 include the differences between tax and book depreciation.

The Company's fixed asset system is at the level of detail required to identify and quantify the cumulative tax deduction. Therefore, at any point in time, the sum of ADIT for FXA01 and FXA02 provides the after-tax cumulative difference between the book basis of fixed assets and the tax basis of fixed assets.

Respondent: Joel Multer

**EXHIBIT LK-8**

ATO-CWC1 A

**Atmos Energy Corporation-Kentucky  
Cash Working Capital Lead/Lag Analysis  
For Forecast Test Year Ended March 31, 2026**

Line No.	Description	Test Year Expenses	Average Daily Expense (b) / 365 days	Revenue Lag	Expense Lead	Net Lag (d) - (e)	CWC Requirement (c) x (f)	
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	
1	Gas Supply Expense							
2	Purchased Gas	87,640,898	240,112 CWC2	34.63 CWC3	39.49	(4.86)	(1,166,944)	
3								
4	Operation and Maintenance Expense							
5	O&M, Labor	14,070,026	38,548 CWC2	34.63 CWC4	14.33	20.30	782,524	
6	O&M, Non-Labor	19,602,496	53,705 CWC2	34.63 CWC5	23.74	10.89	584,940	
7	Total O&M Expense	33,672,523					1,367,464	
8								
9	Taxes Other Than Income							
10	Ad Valorem	12,385,072	33,932 CWC2	34.63 CWC6	278.99	(244.36)	(8,291,572)	
11	Taxes Property and Other	1,102	3 CWC2	34.63 CWC6	58.82	(24.19)	(73)	
12	Payroll Taxes	375,952	1,030 CWC2	34.63 CWC6	13.68	20.95	21,578	
13	Franchise and other pass through	9,795,658	26,837 CWC2	34.63 CWC6	40.37	(5.74)	(154,173)	
14	Public Service Commission	346,856	950 CWC2	34.63 CWC6	(186.50)	221.13	210,074	
15	DOT	232,790	638 CWC2	34.63 CWC6	59.00	(24.37)	(15,548)	
16								
17	Allocated Taxes-Shared Services							
18	Ad Valorem	50,549	138 CWC2	34.63 CWC6	213.50	(178.87)	(24,684)	
19	Payroll Taxes	299,774	821 CWC2	34.63 CWC6	13.68	20.95	17,199	
20								
21	Allocated Taxes-Business Unit							
22	Ad Valorem		0 CWC2	34.63 CWC6	278.99	(244.36)	0	
23	Payroll Taxes	94,109	258 CWC2	34.63 CWC6	13.68	20.95	5,405	
24	Total Taxes Other Than Income	23,581,862					(8,231,794)	
25								
26	Federal Income Tax	11,097,902						
27	Current Taxes	0	0 CWC2	34.63 CWC7	38.25	(3.62)	0	
28	Deferred Taxes	11,097,902	30,405 CWC2	34.63 CWC7	0.00	34.63	1,052,925	
29								
30	State Income Tax	2,832,552						
31	Current Taxes	0	0 CWC2	34.63 CWC8	38.25	(3.62)	0	
32	Deferred Taxes	2,832,552	7,760 CWC2	34.63 CWC8	0.00	34.63	268,729	
33								
34	Depreciation	22,028,375	60,352 CWC2	34.63	0	34.63	2,089,990	
35								
36	Interest Expense - STD	188,470	516 CWC2	34.63 (1)	19.40	15.23	7,859	
37								
38	Interest Expense - LTD	10,051,880	27,539 CWC2	34.63 CWC9	91.40	(56.77)	(1,563,422)	
39								
40	Return on Equity	41,903,174	114,803 CWC2	34.63	0	34.63	3,975,628	
41								
42	TOTAL	232,997,636					(2,199,566)	
43								
44	(1) Please see prior case relied file labeled "CWC1 STD Days Outstanding.pdf (Page 9)" for calculation of average days held							

**EXHIBIT LK-9**



**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-25**  
**Page 1 of 1**

**REQUEST:**

Refer to the Direct Testimony of Ryan Austin and his assertion that completion of the bare steel pipe replacement will extend beyond 2027. Provide the Company's timeline starting in January 2024 and continuing through the forecast completion date, listing the remaining projects, the schedule for completion for each such project, and the costs for each such project by month.

**RESPONSE:**

Subject to the Company's current PRP application in Case No. 2024-00226, the projected projects through 2025 are included on Schedule K-3 in the application. As also noted in the Direct Testimony of Ryan Austin in Case No. 2024-00276, the Company has approximately 88 miles of bare steel after calendar year 2023 (and projected 64 miles remaining following calendar year 2024) remaining in its Kentucky system. The timing and priority of which bare steel projects would be scheduled for replacement are reviewed annually and evaluated through our DIM and Risk Ranking assessment. Replacement priorities will change based on work completed, actual costs, and new information being input into the DIM and Risk Ranking assessment and updating of the models. Also see the response to AG 1-48.

Respondent: Ryan Austin

**EXHIBIT LK-10**

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-26**  
**Page 1 of 1**

**REQUEST:**

Provide the Company's timeline starting in January 2024 and continuing through the forecast completion date, to replace all existing Aldyl-A pipe by project/location and the cost by fiscal year to complete the replacement under the two scenarios where (a) the Aldyl-A costs are replaced on an accelerated timeline and included in the PRP and (b) the costs are incurred in the same manner they are incurred today and are not included in the PRP, except on a project by project basis. Provide all support for your response, including the assumptions, sources and bases for the assumptions, cost estimates, and all other data relied on for this timeline and the related cost estimates. In addition, explain why the Company did not provide this information in either Case 2024-00226, the pending PRP proceeding, or in this proceeding. Further, confirm the Company agrees this information provides useful information for the Commission to consider as it evaluates the Company's requests in this proceeding.

**RESPONSE:**

The Company's pending PRP proceeding, Case No. 2024-00226, concerns only the Company's FY25 PRP investment. The Company's request for Aldyl-A in the PRP program is within this proceeding. The timing and priority of which areas are scheduled for replacement are reviewed annually and evaluated through our DIM and Risk Ranking assessment. Areas of replacement cannot be listed that far out as replacement priorities will change based on work completed and new information being input into the DIM and Risk Ranking assessment and updating of the models. In addition to this case or any future base rate cases, all Aldyl-A projects in any future PRP filing would be subject to review within that filing for reasonableness.

Respondent: Brannon Taylor

**EXHIBIT LK-11**

PRESENT

FOR ENTIRE SERVICE AREA

PSC KY. No. 2

Original SHEET No. 43

ATMOS ENERGY CORPORATION  
(NAME OF UTILITY)

Reserved for Future Use

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DATE OF ISSUE May 13, 2013  
Month/Date/Year

DATE EFFECTIVE January 24, 2014  
Month/Date/Year

Issued by Authority of an Order of the Public Service Commission in  
Case No. 2013-00148

ISSUED BY /s/ Mark A. Martin  
Signature of Officer

TITLE Vice President - Rates and Regulatory Affairs

PROPOSED

CASE NO. 2024-00276

FR 16(1)(b)4  
FOR ENTIRE SERVICE AREA  
ATTACHMENT 1  
PSC KY. No. 2

First Revised SHEET No. 43

Cancelling

Original Sheet No. 43

ATMOS ENERGY CORPORATION  
(NAME OF UTILITY)

Tax Rider

CAMT and Other Tax Rider

1. Applicable:  
Applicable to all customers receiving service under the Company's Rate Schedules G-1, G-2, T-3 and T-4

2. Rate:

Public Law 117-169, 136 STAT. 1818 of August 16, 2022 ("Tax Act 2022");

Purpose

The purpose of this rider is to capture the effects of the Tax Act 2022 and certain other tax-related costs that will change from the amounts included in the base revenue requirement in Case No. 2024-00276. These effects include the return on the Corporate Alternative Minimum Tax ("CAMT") deferred tax asset ("DTA") resulting from the Tax Act 2022, and income tax credits resulting from the Tax Act 2022 included in rate base and in the base revenue requirement in Case No. 2024-00276.

3. Calculation of TAX Rider Revenue Requirement:

The rider shall be calculated as the product of the Company's grossed-up rate of return authorized in the Company's most recent base rate case proceeding times the CAMT deferred tax asset ("CAMT DTA") estimated at September 30 of the fiscal year or applicable quarter-end within a fiscal year prior to the annual change in the rates pursuant to this tariff, less the income tax credits received in accordance with IRC requirements applicable to the Tax Act 2022 grossed-up for income taxes to a revenue equivalent.

The estimated CAMT DTA and the related effects on the rider revenue requirements shall be trued up to the actual effects in the following year and the over/under recovery amortized over the twelve months that each year's recalculated tariff rates are in effect. The over/under recovery shall include a grossed-up rate of return as authorized in the Company's most recent base rate case proceeding.

DATE OF ISSUE September 27, 2024  
Month/Date/Year

DATE EFFECTIVE November 1, 2024  
Month/Date/Year

Issued by Authority of an Order of the Public Service Commission in  
Case No. 2024-00276 dated October XX, 2024

ISSUED BY /s/ Brannon C. Taylor  
Signature of Officer

TITLE Vice President - Rates and Regulatory Affairs

ATMOS ENERGY CORPORATION  
(NAME OF UTILITY)

<b>Tax Rider</b>	(N)
<b>CAMT and Other Tax Rider</b>	(N)
The methodology for computing the Company's CAMT is as follows:	(N)
1. Confirm when Atmos Energy Corporation and its affiliates are subject to CAMT as an "applicable corporation" as defined the Tax Act 2022, then there will be CAMT DTA in the tariff.	(N)
2. Calculate the Kentucky jurisdiction's contribution to Adjusted Financial Statement Income ("AFSI") on a stand-alone basis. Kentucky's AFSI is calculated by adjusting Kentucky applicable financial statement income by adjustments to depreciation, pension costs and federal income tax to arrive at AFSI. AFSI is intended to be computed consistent with applicable IRC requirements.	(N)
3. Compare Kentucky's CAMT stand-alone amount with Kentucky's regular stand-alone tax liability. If the stand alone CAMT is in excess of the stand-alone regular tax, the CAMT DTA is recorded to Kentucky.	(N)
If the Internal Revenue Service issues new guidance related to the Tax Act 2022, the Company shall have the right to make additional filings to recognize such adjustments.	(N)
4. <b>Other Federal, State or Local Tax Rate Changes:</b> To ensure that gas utility customers receive the benefits or costs associated with the changes in tax rates at a federal or state level, the Company shall establish and accrue on its books and records, as of the effective date of the federal, state, or local tax rate change: 1) regulatory liabilities to reflect the impact of a decrease in federal corporate income tax rates or state income or property tax rates; or, 2) regulatory assets to reflect the impact of an increase in federal corporate income tax rates or state income or property tax rates.	(N)
The increase or decrease shall be calculated as follows:	(N)
a. A portion of the Company's revenue representing the difference between: 1) the cost of service as approved by the Commission in the Company's most recent general rate proceeding, and 2) the cost of service that would have resulted had the rates been based on the new federal income tax rate (increase or decrease) or state/local income/property taxes (increase or decrease), as of the effective date of the change;	(N)
b. If applicable, the portion of the Company's revenue representing the difference between: 1) each surcharge approved by the Commission since the Company's most recent general rate proceeding, and 2) each surcharge that would have resulted had the surcharges been based on the new federal income tax rate (increase or decrease) or state/local income/property taxes (increase or decrease), as of the effective date of the change; and	(N)
c. The excess or deficient deferred tax reserve, including any associated gross up in taxes, caused by the reduction or increase in the federal corporate income tax rate or state/local related tax increases, as of the effective date of the change.	(N)

DATE OF ISSUE September 27, 2024  
Month/Date/Year

DATE EFFECTIVE November 1, 2024  
Month/Date/Year

Issued by Authority of an Order of the Public Service Commission in  
Case No. 2024-00276 dated October XX, 2024

ISSUED BY /s/ Brannon C. Taylor  
Signature of Officer

TITLE Vice President - Rates and Regulatory Affairs

PRESENT

PROPOSED

CASE NO. 2024-00276  
FR 16(1)(b)4  
~~FOR ENLIGHTENED INVESTMENT~~  
PSC KY. No. 2  
Original SHEET No. 43B

ATMOS ENERGY CORPORATION  
(NAME OF UTILITY)

Tax Rider	(N)
CAMT and Other Tax Rider	(N)
The Company shall separately refund to customers based on a decrease in federal or state/local tax rates or separately collect from customers based on an increase in federal or state/local tax rates within twelve (12) months or, pursuant to applicable IRC rules and regulations, as follows:	(N)
d. The amount collected/refunded by the Company that reflects the difference in base rates between: 1) the cost of service approved by the Commission in the Company's most recent general rate proceeding, and 2) the cost of service that would have resulted had the rates been based upon the new federal or state/local tax rates, between the effective date of this order and the effective date of the changes.	(N)
e. If applicable, the amount collected/refunded by the Company that reflects the difference between: 1) each surcharge approved by the Commission since the Company's most recent general rate proceeding, and 2) each surcharge that would have resulted had the rates been based upon the new federal or state/local tax rates, between the effective date of this order and the effective date of the changes.	(N)
f. The amount collected/refunded by the Company that reflects the difference in the excess or deficient deferred tax reserve included in base rates between: 1) the cost of service approved by the Commission in the Company's most recent general rate proceeding, and 2) the cost of service that would have resulted had the rates been based upon the new federal or state/local tax rates, between the effective date of this order and the effective date of the changes. These amounts shall be refunded or collected from customers based upon IRC rules and regulations if applicable.	(N)
<b>5. Term:</b> The TAX Rider Rates shown on this page will be effective until the earlier of 1) the effective date of new TAX Rider rates established pursuant to this tariff, or 2) until future order by the Commission to modify or eliminate the rider.	(N)
<b>6. Service Regulations:</b> The supplying of, and billing for, service and all conditions applying thereto are subject to the jurisdiction of the Kentucky Public Service Commission, and to Company's Service Regulations currently in effect, as filed with the Kentucky Public Service Commission as provided by law.	(N)

DATE OF ISSUE September 27, 2024  
Month/Date/Year

DATE EFFECTIVE November 1, 2024  
Month/Date/Year

Issued by Authority of an Order of the Public Service Commission in  
Case No. 2024-00276 dated October XX, 2024

ISSUED  
BY /s/ Brannon C. Taylor  
Signature of Officer

TITLE Vice President - Rates and Regulatory Affairs

PRESENT

PROPOSED

CASE NO. 2024-00276  
FR 16(1)(b)4  
~~FOR ENVIRO SERVICE AREA~~  
PSC KY. No. 2  
Original SHEET No. 43C

ATMOS ENERGY CORPORATION  
(NAME OF UTILITY)

Tax Rider			
CAMT and Other Tax Rider			
<b>7. CAMT and Other Tax Rider Rates</b>			
The charges for the respective gas service schedules for the revenue month beginning October 1, 2026 per billing period are:			
	<u>Monthly Customer Charge</u>		<u>Distribution Charge per Mcf</u>
Rate G-1 (Residential)	\$0.00	1-300	\$0.0000 per 1000 cubic feet
		301-15,000	\$0.0000 per 1000 cubic feet
		Over 15,000	\$0.0000 per 1000 cubic feet
Rate G-1 (Non-Residential)	\$0.00	1-300	\$0.0000 per 1000 cubic feet
		301-15,000	\$0.0000 per 1000 cubic feet
		Over 15,000	\$0.0000 per 1000 cubic feet
Rate G-2	\$0.00	1-15,000	\$0.0000 per 1000 cubic feet
		Over 15,000	\$0.0000 per 1000 cubic feet
Rate T-3	\$0.00	1-15,000	\$0.0000 per 1000 cubic feet
		Over 15,000	\$0.0000 per 1000 cubic feet
Rate T-4	\$0.00	1-300	\$0.0000 per 1000 cubic feet
		301-15,000	\$0.0000 per 1000 cubic feet
		Over 15,000	\$0.0000 per 1000 cubic feet

DATE OF ISSUE September 27, 2024  
Month/Date/Year

DATE EFFECTIVE November 1, 2024  
Month/Date/Year

Issued by Authority of an Order of the Public Service Commission in  
Case No. 2024-00276 dated October XX, 2024

ISSUED BY /s/ Brannon C. Taylor  
Signature of Officer

TITLE Vice President - Rates and Regulatory Affairs



PRESENT

PROPOSED

CASE NO. 2024-00276  
FR 16(1)(b)4  
ATTACHMENT 1

FOR ENTIRE SERVICE AREA  
PSC KY. No. 2  
Original SHEET No. 43D

ATMOS ENERGY CORPORATION  
(NAME OF UTILITY)

Tax Rider		(N)
CAMT and Other Tax Rider		(N)
8. <u>CAMT and Other Tax Rider Rates</u>		(N)
<p>All customers receiving service under tariff Rate Schedules G-1, G-2, T-3 and T-4 shall be assessed an adjustment to their applicable rate schedule. The allocation to G-1 residential, G-1 non-residential, G-2, T-3 and T-4 will be in proportion to their relative base revenue share approved in the Company's most recently concluded base rate case or as otherwise designated by the Commission.</p> <p>On or before May 1 of each year, starting in 2026, the Company shall file with the Commission the calculations described in Sections 3 and 4 along with supporting schedules and workpapers. Rates will become effective for bills calculated on or after October 1, starting in 2026. The Commission may request additional clarification or information regarding the calculations, or any component thereof on or before July 1.</p>		(N) (N) (N) (N) (N) (N)

DATE OF ISSUE September 27, 2024  
Month/Date/Year

DATE EFFECTIVE November 1, 2024  
Month/Date/Year

Issued by Authority of an Order of the Public Service Commission in  
Case No. 2024-00276 dated October XX, 2024

ISSUED BY /s/ Brannon C. Taylor  
Signature of Officer

TITLE Vice President - Rates and Regulatory Affairs

**EXHIBIT LK-12**

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-21**  
**Page 1 of 1**

**REQUEST:**

Refer to Exhibit TRA-5, which includes the Company's estimate of the proposed cost of the MAOP reconfirmations in fiscal years 2025 and 2026.

- a. Complete the schedule so that it includes the proposed cost of the MAOP reconfirmations in fiscal years 2027 through 2034.
- b. Provide the actual and proposed costs of the MAOP reconfirmations to date as of December 31, 2024, March 31, 2025, and each month during the 12 months ending March 31, 2026. Provide the related amounts included in rate base (GPIS, accumulated depreciation, and ADIT due to method/life differences), operating expenses (depreciation, O&M expense, A&G expense, taxes other than income tax expense), and the return on rate base included in the Company's requested base rate increase. Provide all support relied on for your response, including, but not limited to, all assumptions, data, and calculations in live Excel format with all formulas intact

**RESPONSE:**

- a. While Atmos Energy can identify the general scope of the projects required to be completed through 2034, It is not possible to provide a reliable estimate of projects more than 3 years into the future, as the costs depend heavily on the engineering design, circumstances encountered at the time, and costs of materials and labor which can be expected to vary significantly when projected so far into the future. Instead, the proposed PM Rider will enable the Company to annually file its proposed projects for MAOP reconfirmation, similar to the PRP. These filings will allow for more accurate projections for each upcoming fiscal year, and will be subject to review and approval by the Commission each year.
- b. See the Company's plant data file and revenue requirement model provided in response to Staff 1-54. Also see Exhibits TRA-5, TRA-6, and TRA-7 provided in the Direct Testimony of Company witness Ryan Austin. The direct testimony of Greg Waller details the methodology and approach used to forecast each cost of service component listed in the request. The Company's cost of service is not calculated separately for each project included in rate base.

Respondents: Ryan Austin and Greg Waller

**EXHIBIT LK-13**

**Case No. 2024-00276**  
**Atmos Energy Corporation, Kentucky Division**  
**AG DR Set No. 1**  
**Question No. 1-20**  
**Page 1 of 1**

**REQUEST:**

Confirm that the Company has complied with all requirements of the Mega Rule, including the rulemakings for Parts 1, 2, and 3 since it was enacted and has done so without a rider to recover the costs, specific or otherwise, such as the PM rider proposed in this case. If this is not correct, then provide a corrected statement and provide all support relied on for your response.

**RESPONSE:**

Confirm. As demonstrated in the response to AG 1-19 as well as Exhibit TRA-5 to the Direct Testimony of Ryan Austin, the timing of the deadlines for compliance with applicable sections of the code have not yet mandated significant capital investments in the Kentucky transmission assets, but will require the future projects identified in Mr. Austin's Exhibit TRA-5 on the timeline reflected therein.

Respondent: Ryan Austin