

January 3, 2025

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

Re: *In the Matter of: Electronic Application of Atmos Energy Corporation for an Adjustment of Rates; Approval of Tariff Revisions; and Other General Relief-*
Case No. 2024-00276

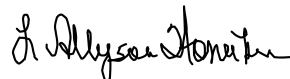
Dear Ms. Bridwell:

Please find attached Atmos Energy Corporation's Responses to the Attorney General's Second Request for Information and a Motion for Confidential Treatment in the above styled case.

This is to certify that the foregoing electronic filing was transmitted to the Commission on January 3, 2025; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing will be made.

If you have any questions, please let me know.

Very truly yours,



L. Allyson Honaker

Enclosure

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

In the Matter of:

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

ATMOS ENERGY’S MOTION FOR CONFIDENTIAL TREATMENT

Comes now Atmos Energy Corporation (“Atmos Energy”), by and through counsel, pursuant to KRS 61.878, 807 KAR 5:001, Section 13 and other applicable law, and requests that the Kentucky Public Service Commission (“Commission”) afford confidential treatment to certain information filed in its Responses to Commission Staff’s Third Request for Information (“Staff’s Third Request”) and the Attorney General’s Second Request for Information (“Attorney General’s Second Request”). In support of the motion Atmos Energy respectfully states as follows:

1. On December 16, 2024, Commission Staff issued its Third Request for Information and the Attorney General issued its Second Request for Information to Atmos Energy in the above styled proceeding.

2. As part of Atmos Energy’s responses, Atmos Energy is providing detailed information that Atmos Energy believes is confidential and should not be publicly disclosed. Specifically, the information is being provided in response to Staff’s Third Request, Item 3 and Attorney General’s Second Request, Item 1.

3. Request No. 3, Attachment 1 in Staff’s Third Request required Atmos Energy to provide a breakdown showing the extent to which Atmos has shared in savings pursuant to its performance based rate (“PBR”) mechanism in each fiscal year from 2021 to present. The

Attorney General's Second Request, Item 1 required Atmos Energy to provide information regarding raises in 2024. This response is referred to as the "Confidential Information" for which confidential protection is sought.

4. The Kentucky Open Records Act and applicable precedent exempts the Confidential Information from disclosure, including KRS 61.878(1)(a); KRS 61.878(1)(c)(1); *Zink v. Department of Workers Claims, Labor Cabinet*, 902 S.W.2d 825 (Ky. App. 1994); and, *Hoy v. Kentucky Industrial Revitalization Authority*, 907 S.W.2d 766, 768 (Ky. 1995). The public disclosure of the Confidential Information would potentially harm Atmos Energy's competitive position in the marketplace which would be to the detriment of Atmos Energy. Additionally, the Confidential Information is publicly unavailable, and its confidentiality is critical to Atmos Energy's effective execution of business decisions and strategy. For these reasons, the Confidential Information satisfies both the statutory and common law standards for affording confidential treatment.

5. Staff's Third Request, Item 3 required Atmos Energy to provide the extent to which Atmos has shared in savings pursuant to its PBR mechanism in each fiscal year from 2021 to present. In Attachment 1 to Response 3, Atmos Energy is providing the Kentucky PBR Savings June 2020-May 2024. Atmos Energy believes this information should be granted confidential treatment pursuant to KRS 61.878(1)(c)(1) because disclosure of this information would allow competitors an unfair commercial advantage because if this information competitors will gain information regarding Atmos Energy's gas purchases, transportation costs, and business strategies. This Commission has granted confidential treatment for this information in the past.¹

¹ Case No. 2020-00289, *Electronic Request of Atmos Energy Corporation for Modification and Extension of its Gas Cost Adjustment Performance Based Ratemaking Mechanism*, December 6, 2022 Order (Ky. PSC December 6, 2022).

Additionally, Atmos Energy has requested confidential treatment for the same information in Case No. 2024-00205.²

6. The Attachment provided in response to the Attorney General's Second Request, Item 1 contains a third-party document regarding merit increases to employee salary. Atmos Energy is requesting confidential treatment of this third-party document pursuant to KRS 61.878(1)(c)(1) because if disclosed competitors in the utility industry would have inside knowledge of Atmos Energy's pay structure. This would case an unfair commercial advantage in the competitive area of employee retention. Additionally, Atmos Energy is requesting confidential treatment of this document pursuant to KRS 61.878(1)(a) because disclosure of the salary recommendations of employees would be an unwarranted invasion of personal privacy.

7. Atmos Energy does not object to limited disclosure of the Confidential Information, pursuant to an acceptable confidentiality and nondisclosure agreement, to any intervenors with a legitimate interest in reviewing the same for the sole purpose of participating in this case. However, as it is unknown who may or may not eventually intervene in the case, Atmos Energy reserves the right to object to sharing the Confidential Information with any party that may have a mixed-motive for accessing the Confidential Information, that may be a competitor of Atmos Energy in any market, who may have a commercial conflict of interest or for any other reason.

8. In accordance with the provisions of 807 KAR 5:001, Section 13(2), Atmos Energy is providing one copy of the Confidential Information separately under seal. Since Atmos Energy is requesting confidential treatment for the entirety of the documents, a redacted copy is not being provided in the public record and the copies being filed under seal with the Commission do not

² Case No. 2024-00205, *Electronic Application of Atmos Energy Corporation for Performance Based Ratemaking Mechanism*; Atmos Energy Staff Set 1 Confidentiality Motion (filed October 25, 2024).

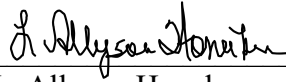
contain highlights. The filing of the Confidential Information is noted in the public version of Atmos Energy's responses.

9. In accordance with the provisions of 807 KAR 5:001, Section 13(3), Atmos Energy respectfully requests that the documents be granted indefinite confidential protection. Given the competitive nature of the natural gas business it is necessary that the information remain confidential indefinitely.

WHEREFORE, on the basis of the foregoing, Atmos Energy respectfully requests the Commission to enter an Order granting this Motion for Confidential Treatment and to so afford such protection from public disclosure to the unredacted copies of Confidential Information, which is filed herewith under seal, for the periods set forth herein.

This the 3rd day of January, 2025.

Respectfully submitted,



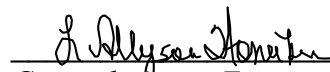
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Attorneys for Atmos Energy Corporation

CERTIFICATE OF SERVICE

This is to certify that the electronic filing has been transmitted to the Commission on January 3, 2025, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means. Pursuant to prior Commission Orders no paper copies of this filing will be made.



Counsel, Atmos Energy Corporation

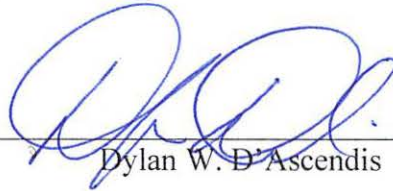
BEFORE THE PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

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

CERTIFICATE AND AFFIDAVIT

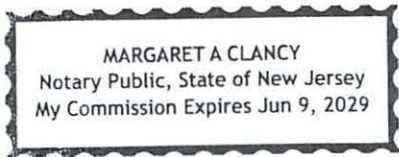
The Affiant, Dylan W. D'Ascendis, being duly sworn, deposes and states that the attached responses to the Office of the Attorney General's second request for information are true and correct to the best of his knowledge and belief



Dylan W. D'Ascendis

STATE OF NEW JERSEY
COUNTY OF BURLINGTON

SUBSCRIBED AND SWORN to before me by Dylan W. D'Ascendis on this the 18 day of December, 2024.



Margaret A Clancy
Notary Public
My Commission Expires: June 9, 2029

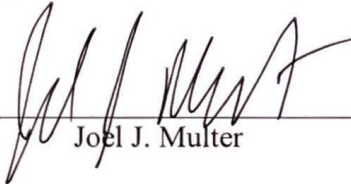
BEFORE THE PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

ELECTRONIC APPLICATION OF ATMOS)
ENERGY CORPORATION FOR AN)
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TARIFF REVISIONS; AND OTHER)
GENERAL RELIEF)

CERTIFICATE AND AFFIDAVIT

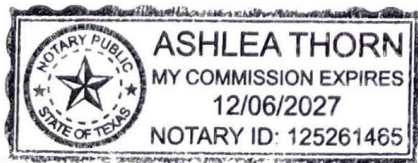
The Affiant, Joel J. Multer, being duly sworn, deposes and states that the attached responses to the Office of the Attorney General's second request for information are true and correct to the best of his knowledge and belief



Joel J. Multer

STATE OF TEXAS
COUNTY OF DALLAS

SUBSCRIBED AND SWORN to before me by Joel J. Multer on this the 19 day of December, 2024.





Notary Public
My Commission Expires: 12/06/2027

BEFORE THE PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

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

CERTIFICATE AND AFFIDAVIT

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



Brannon C. Taylor

STATE OF TENNESSEE
COUNTY OF WILLIAMSON

SUBSCRIBED AND SWORN to before me by Brannon C. Taylor on this the 18th day of December, 2024.



Notary Public

My Commission Expires: 01-24-2028




BEFORE THE PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

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

CERTIFICATE AND AFFIDAVIT

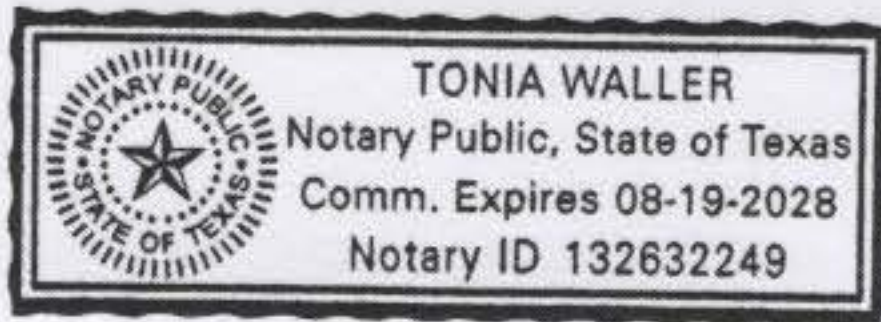
The Affiant, Gregory K. Waller, being duly sworn, deposes and states that the attached responses to the Office of the Attorney General's second request for information are true and correct to the best of his knowledge and belief



 Gregory K. Waller

STATE OF TEXAS
COUNTY OF DENTON

SUBSCRIBED AND SWORN to before me by Gregory K. Waller on this the 2nd day of January, 2025.





 Notary Public

My Commission Expires: 8/19/2028

Case No. 2024-00276
Atmos Energy Corporation, Kentucky Division
AG DR Set No. 2
Question No. 2-01
Page 1 of 1

REQUEST:

Refer to the response to Staff 1-38 in regards to the two merit increases during fiscal 2024, one on October 1, 2024 and the other effective June 8, 2024.

- a. Explain all reasons for the second fiscal year 2024 merit increase of 3.0% effective June 8, 2024.
- b. Confirm that the second fiscal year 2024 merit increase applied to all employees at all divisions in which costs are directly charged or allocated to Atmos-KY. If not confirmed, explain why not.

RESPONSE:

- a. The second fiscal year 2024 merit increase of 3.0% effective June 8, 2024 was necessary for Atmos Energy to be within a range that makes it competitive in the marketplace. See confidential Attachment 1 from Willis Towers Watson showing substantiation and recommendation of the increase.
- b. The second fiscal year 2024 merit increase of 3.0% effective June 8, 2024 applied to all employees at all divisions in which costs are directly charged or allocated to Atmos-KY, with the exception of employees that participate in the Company's Management Incentive Program ("MIP"), as Atmos Energy determined at that time that compensation for those employees was already within a range to be considered competitive with the marketplace.

ATTACHMENT:

AG_2-01_Att1 - FY2025 Merit and Structure Rec (CONFIDENTIAL).pdf

Respondent: Greg Waller

Case No. 2024-00276
Atmos Energy Corporation, Kentucky Division
AG DR Set No. 2
Question No. 2-02
Page 1 of 2

REQUEST:

Refer to the question and response to AG 1-74 and to Exhibit GWK-3 in regards to the labor, benefits, and employee welfare O&M cost elements for the projected test year ended March 31, 2026, the actual and projected base year ended December 31, 2024 and for the actual fiscal year ended September 30, 2024. The sum of O&M expenses for these three cost elements for the base year was \$17,823,547. The sum of O&M expenses for these three cost elements for the actual fiscal year ended September 30, 2024 was \$16,700,070.

- a. Explain all reasons why the actual 2024 fiscal year expenses were so much lower than the actual and projected base year expenses. Include as part of the response the quantified effects of the second fiscal year 2024 merit increase of 3.0% effective June 8, 2024 for the last three months of calendar year 2024.
- b. Provide the amount of vacant positions for each division applicable to Atmos KY as of September 30, 2022, September 30, 2023 and September 30, 2024.
- c. Indicate whether the base year or test year projections were based on full employment or whether provisions were made for potential vacant positions. If such provisions were made, describe them.
- d. Indicate all known reasons why the actual benefits expense was only \$1,925,731 during the 2024 fiscal year and how they are expected to more than double in the test year to \$3,908,255.

RESPONSE:

- a. The variance in fiscal year 2024 actual expenses compared to the Base Period is due largely to the difference in comparison periods. The Base Period includes six months of actual expenses in fiscal 2024 (January through June 2024), the last three months of 2024 fiscal budget (July through September 2024) and the first three months of 2025 fiscal budget (October through December 2024). Comparing actual fiscal year 2024 expenses to the Base Period that includes budgeted 2025 fiscal expenses would result in many variances, notably that the three months of fiscal 2025 expenses would include two merit increases not included in fiscal 2024 actual results (which includes October 2023-December 2023). Isolating the variance related to this period comparison issue is (\$471,212), which leaves a remaining variance of (\$652,265).

Upon review of this remaining variance, the Company inadvertently included a debit to expense in Division 091 necessary to record a GAAP reporting adjustment for non-service cost OPEB benefits in the budgeted periods for both Fiscal 2024 and 2025 that should not be included in Test Period O&M. The Kentucky portion of this overstatement is \$616,741.

Case No. 2024-00276
Atmos Energy Corporation, Kentucky Division
AG DR Set No. 2
Question No. 2-02
Page 2 of 2

- b. Vacancies applicable to the Atmos Kentucky Division as of September 30, 2024 include nine Kentucky positions and one Kentucky Mid-States position. Atmos Energy does not track vacancies on a historical basis, and cannot provide this information as of September 30, 2022 and September 30, 2023.
- c. The Company strives to fill vacancies in a timely manner and prepares its budget accordingly. The first six months of the Base Period reflect actual labor expense and therefore reflects actual open positions. For the Test Period, which is based on the Company's FY2025 budget, a credit to labor expense of \$408,000 was budgeted in DIV 091 (the division General Office) to account for attrition (approximately half of which is allocated to Kentucky).
- d. Labor expense is budgeted each year at a level to address anticipated workload. See the response to Staff 1-38 and the Direct Testimony of Greg Waller at page 26. The increase in labor expense between fiscal 2024 actual expenses and the Test Period includes the impact of three merit increases averaging 3 - 3.5% each.

As described in the response to subpart (a), there is debit to expense in Division 091 necessary to record a GAAP reporting adjustment for non-service cost OPEB benefits which should not have been included in Test Period O&M. The allocated impact to Kentucky of the overstatement related to this entry in the Test Period is \$1,285,473.

Respondent: Greg Waller

Case No. 2024-00276
Atmos Energy Corporation, Kentucky Division
AG DR Set No. 2
Question No. 2-03
Page 1 of 2

REQUEST:

Refer to the response to AG 1-86 in regards to general ledger data for ad valorem costs for Kentucky Division 009 for fiscal years 2022, 2023, and 2024.

- a. Explain all reasons for the large negative adjustment to ad valorem expense recorded in September 2023.
- b. Provide a copy of the journal entry and all supporting documentation used to record the large negative adjustment to ad valorem expense in September 2023.
- c. Provide a copy of the journal entry and all supporting documentation used to record the expense amount of \$117,400 in February 2024.
- d. Explain all reasons why the monthly ad valorem tax accrual for Kentucky Division 009 increased from only \$857,500 per month during the first eight months of calendar year 2023 to \$1,117,400 for eight of the nine months listed during calendar year 2024, which represents an increase of 30.3%.

RESPONSE:

- a. The Company received verbal acceptance of a settlement offer related to tax years 2020, 2021, and 2022 on August 21, 2023, which resulted in a reduction to the original estimate for those tax years by \$3,400,000. During the same quarter, the Company became aware that the Department of Revenue intended to change their methodology of valuation based on the *Marathon Pipeline* court case for tax years 2023 and forward. This change would result in an increase to the 2023 estimate by \$1,900,000. This additional tax increase to the 2023 estimate netted with the reduction from the prior years' settlement created the adjustment of \$1,500,000 (\$3,400,000 - \$1,900,000). As a result, the Company adjusted the balance in the 25201 sub-account in September to reflect the "net" reduced tax liability. The final settlement for 2020-2022 was provided in response to AG 1-89 in the attachment, "AG_1-89_Att1 - 2020-2022 Atmos Settlement Agreement (CONFIDENTIAL)" and contains the same terms as the verbal acceptance in August 2023.
- b. See Attachment 1 for the journal entry recorded. See the response to subpart (a) for discussions with the Department of Revenue.
- c. See Attachment 2 for the journal entry recorded. See the response to subpart (a) for discussions with the Department of Revenue. This valuation was lower than anticipated.
- d. The budgeted monthly accrual during 2024 resulted in an increase from the prior year for two primary reasons. First, the estimate includes an overall 10% valuation increase from the original 2023 tax valuation estimate. Second, the accruals in calendar year 2024 include an increase related to the Department of Revenue's position related to the Marathon case described in subpart (a) above.

Case No. 2024-00276
Atmos Energy Corporation, Kentucky Division
AG DR Set No. 2
Question No. 2-03
Page 2 of 2

ATTACHMENTS:

AG_2-03_Att1 - Ad Valorem Journal Entry Sep-23.xlsx

AG_2-03_Att2 - Ad Valorem Journal Entry Feb-24.xlsx

Respondent: Greg Waller

Atmos Energy Corporation - Kentucky (Div 009)

Ad Valorem Journal Entry - September 2023

Batch Name: bpj-20231002-01**Batch Description:** 2023 Monthly Property Tax Accrual

<u>CO</u>	<u>CC</u>	<u>Acct</u>	<u>Sub</u>	<u>Sub Description</u>	<u>Service Area</u>	<u>Debits</u>	<u>Credits</u>	<u>Line Description</u>
050	0000	2360	25201	Ad Valorem Tax	009000	-	857,500.00	Mid States - KY
050	0000	4081	30101	Ad Valorem - Accrual	009000	857,500.00	-	Mid States - KY
050	0000	2360	25201	Ad Valorem Tax	009000	1,500,000.00	-	Mid States - KY
050	0000	4081	30101	Ad Valorem - Accrual	009000	-	1,500,000.00	Mid States - KY
						<u>2,357,500.00</u>	<u>2,357,500.00</u>	

Atmos Energy Corporation - Kentucky (Div 009)

Ad Valorem Journal Entry - February 2024

Batch Name: tlf-20240304-01

Batch Description: 2023 Property Tax True-Up

<u>CO</u>	<u>CC</u>	<u>Acct</u>	<u>Sub</u>	<u>Sub Description</u>	<u>Service Area</u>	<u>Debits</u>	<u>Credits</u>	<u>Line Description</u>
050	0000	2360	25201	Ad Valorem Tax	009000	1,000,000.00	0.00	True-Up
050	0000	4081	30101	Ad Valorem - Accrual	009000	0.00	1,000,000.00	True-Up
						<u>1,000,000.00</u>	<u>1,000,000.00</u>	

Batch Name: bpj-20240304-01

Batch Description: 2024 Monthly Property Tax Accrual

<u>CO</u>	<u>CC</u>	<u>Acct</u>	<u>Sub</u>	<u>Sub Description</u>	<u>Service Area</u>	<u>Debits</u>	<u>Credits</u>	<u>Line Description</u>
050	0000	2360	25201	Ad Valorem Tax	009000	0.00	1,117,400.00	Mid States - KY
050	0000	4081	30101	Ad Valorem - Accrual	009000	1,117,400.00	0.00	Mid States - KY
						<u>1,117,400.00</u>	<u>1,117,400.00</u>	

Case No. 2024-00276
Atmos Energy Corporation, Kentucky Division
AG DR Set No. 2
Question No. 2-04
Page 1 of 1

REQUEST:

Refer to the trial balances for the Kentucky Division attached to the response to AG 1-30 and specifically to account 2360 (Taxes accrued) sub account 25201 (Ad Valorem Tax). For each of the calendar years 2021 through 2024 (with the most current month with data available), provide the monthly activity in this account/subaccount to reflect the beginning balance, expense accruals, expense adjustments, ad valorem tax payments, and ending balances.

RESPONSE:

See Attachment 1.

ATTACHMENT:

AG_2-04_Att1 - Account 2360-25201 Rollforward.xlsx

Respondents: Greg Waller and Emily Wiebe

Atmos Energy Corporation - Kentucky (Div 009)
Account 2360-25201 Ad Valorem Tax Rollforward
For January 2021 through November 2024

Month	Beginning Balance	Expense Accruals	Expense Adjustments	Payments/Refunds	Ending Balance
Jan-21	(8,196,609.20)	(695,800.00)	-	785,521.77	(8,106,887.43)
Feb-21	(8,106,887.43)	(695,800.00)	-	7,175.76	(8,795,511.67)
Mar-21	(8,795,511.67)	(695,800.00)	-	184.56	(9,491,127.11)
Apr-21	(9,491,127.11)	(695,800.00)	-	-	(10,186,927.11)
May-21	(10,186,927.11)	(695,800.00)	-	3,697,398.94	(7,185,328.17)
Jun-21	(7,185,328.17)	(695,800.00)	-	1,381,971.92	(6,499,156.25)
Jul-21	(6,499,156.25)	(695,800.00)	-	471,673.20	(6,723,283.05)
Aug-21	(6,723,283.05)	(695,800.00)	-	4,054.19	(7,415,028.86)
Sep-21	(7,415,028.86)	(695,800.00)	(500,000.00)	-	(8,610,828.86)
Oct-21	(8,610,828.86)	(737,655.00)	-	428,239.02	(8,920,244.84)
Nov-21	(8,920,244.84)	(737,655.00)	-	823,278.05	(8,834,621.79)
Dec-21	(8,834,621.79)	(737,655.00)	-	46,467.18	(9,525,809.61)
Jan-22	(9,525,809.61)	(780,000.00)	-	3,008,319.97	(7,297,489.64)
Feb-22	(7,297,489.64)	(780,000.00)	-	2,130,370.60	(5,947,119.04)
Mar-22	(5,947,119.04)	(780,000.00)	-	350,368.58	(6,376,750.46)
Apr-22	(6,376,750.46)	(780,000.00)	-	508,715.54	(6,648,034.92)
May-22	(6,648,034.92)	(780,000.00)	-	118,952.27	(7,309,082.65)
Jun-22	(7,309,082.65)	(780,000.00)	-	72,140.98	(8,016,941.67)
Jul-22	(8,016,941.67)	(780,000.00)	-	411.64	(8,796,530.03)
Aug-22	(8,796,530.03)	(780,000.00)	-	-	(9,576,530.03)
Sep-22	(9,576,530.03)	(780,000.00)	-	105,310.25	(10,251,219.78)
Oct-22	(10,251,219.78)	(780,000.00)	-	49,040.50	(10,982,179.28)
Nov-22	(10,982,179.28)	(780,000.00)	-	-	(11,762,179.28)
Dec-22	(11,762,179.28)	(780,000.00)	-	59,958.07	(12,482,221.21)
Jan-23	(12,482,221.21)	(857,500.00)	-	777,479.00	(12,562,242.21)
Feb-23	(12,562,242.21)	(857,500.00)	-	4,192,923.99	(9,226,818.22)
Mar-23	(9,226,818.22)	(857,500.00)	-	1,473,878.10	(8,610,440.12)
Apr-23	(8,610,440.12)	(857,500.00)	-	747,251.62	(8,720,688.50)
May-23	(8,720,688.50)	(857,500.00)	-	101,615.93	(9,476,572.57)
Jun-23	(9,476,572.57)	(857,500.00)	-	-	(10,334,072.57)
Jul-23	(10,334,072.57)	(857,500.00)	-	-	(11,191,572.57)
Aug-23	(11,191,572.57)	(857,500.00)	-	-	(12,049,072.57)
Sep-23	(12,049,072.57)	(857,500.00)	1,500,000.00	-	(11,406,572.57)
Oct-23	(11,406,572.57)	(1,015,900.00)	-	15,956.57	(12,406,516.00)
Nov-23	(12,406,516.00)	(1,015,900.00)	-	79,396.46	(13,343,019.54)
Dec-23	(13,343,019.54)	(1,015,900.00)	-	-	(14,358,919.54)
Jan-24	(14,358,919.54)	(1,117,400.00)	-	11,036.08	(15,465,283.46)
Feb-24	(15,465,283.46)	(1,117,400.00)	1,000,000.00	2,510,910.26	(13,071,773.20)
Mar-24	(13,071,773.20)	(1,117,400.00)	-	5,635.98	(14,183,537.22)
Apr-24	(14,183,537.22)	(1,117,400.00)	-	3,755,337.51	(11,545,599.71)
May-24	(11,545,599.71)	(1,117,400.00)	-	379,214.58	(12,283,785.13)
Jun-24	(12,283,785.13)	(1,117,400.00)	-	521,659.86	(12,879,525.27)
Jul-24	(12,879,525.27)	(1,117,400.00)	-	10,478.29	(13,986,446.98)
Aug-24	(13,986,446.98)	(1,117,400.00)	-	64,524.46	(15,039,322.52)
Sep-24	(15,039,322.52)	(1,117,400.00)	-	613,281.04	(15,543,441.48)
Oct-24	(15,543,441.48)	(792,400.00)	-	165,626.82	(16,170,214.66)
Nov-24	(16,170,214.66)	(792,400.00)	-	40,700.46	(16,921,914.20)

Case No. 2024-00276
Atmos Energy Corporation, Kentucky Division
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REQUEST:

Refer to the response to AG 1-88 in regards to the analyses performed of property taxes by year. Provide copies of the analyses created for the FY 2024 budget and for the FY 2025 budget for Kentucky Division 009.

RESPONSE:

The budget for fiscal 2024 was made during May 2023. At that time, the estimate of overall 2023 tax liability was \$12,190,248. In order to estimate the 2024 tax year and its impact on the fiscal 2024 budget, the Company increased the 2023 estimate by 10% to \$13,409,273, or rounded to \$1,117,400 per month. A 10% increase is based on the general increase in value due to typical anticipated performance measure changes such as net operating income and also property additions.

For the fiscal 2025 budget made in May 2024, the Company utilized the best estimate for the 2024 tax year which at that time had reduced to \$12,082,959 (10% over the revised 2023 estimate due to receiving the initial assessment). Adding a 10% increase in value would create a 2025 tax estimate of \$13,291,255, or rounded to \$1,107,600 per month.

There are no specific schedules or workpapers responsive to the request.

Respondent: Greg Waller

Case No. 2024-00276
Atmos Energy Corporation, Kentucky Division
AG DR Set No. 2
Question No. 2-06
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REQUEST:

Provide the amounts and dates of each actual ad valorem tax payment made during each calendar year 2022, 2023, and 2024 for each taxing authority for Kentucky division 009, identifying the tax year to which each payment was applicable.

RESPONSE:

See Attachment 1.

Note that at the time of this response, the Company has not yet received all tax bills for the 2020-2024 tax years and will be making additional payments for those years at some point in the future. In addition, a portion of certain tax years were paid prior to January 2022.

ATTACHMENT:

AG_2-06_Att1 - Ad Valorem Tax Payments.xlsx

Respondent: Greg Waller

Atmos Energy Corporation - Kentucky (Div 009)
Ad Valorem Tax Payments
For January 2021 through November 2024

Transaction Date	Tax Year	Vendor Name	Total
1/7/2022	2021	BOYLE COUNTY CLERK	84,980.02
1/7/2022	2021	BRECKINRIDGE COUNTY SHERIFF	25,969.42
1/7/2022	2021	BURGIN BOARD OF EDUCATION	18,145.72
1/7/2022	2021	CAMPBELLSVILLE INDEPENDENT SCHOOL BRD	86,293.33
1/7/2022	2021	CITY OF AUBURN	5,138.08
1/7/2022	2021	CITY OF BEAVER DAM	4,740.14
1/7/2022	2021	CITY OF CADIZ	4,144.09
1/7/2022	2021	CITY OF CALVERT CITY	5,493.23
1/7/2022	2021	CITY OF CAMPBELLSVILLE	26,596.99
1/7/2022	2021	CITY OF CENTRAL CITY	6,014.48
1/7/2022	2021	CITY OF CLOVERPORT	4,030.63
1/7/2022	2021	CITY OF DAWSON SPRINGS	14,844.06
1/7/2022	2021	CITY OF EARLINGTON	2,056.31
1/7/2022	2021	CITY OF ELKTON	4,184.28
1/7/2022	2021	CITY OF GREENVILLE KY	12,831.56
1/7/2022	2021	CITY OF HARDINSBURG	5,772.93
1/7/2022	2021	CITY OF HARTFORD	10,935.72
1/7/2022	2021	CITY OF HORSE CAVE	6,387.12
1/7/2022	2021	CITY OF MADISONVILLE KY	20,009.54
1/7/2022	2021	CITY OF MORTONS GAP	817.72
1/7/2022	2021	CITY OF OWENSBORO	489,098.60
1/7/2022	2021	CITY OF RUSSELLVILLE	20,195.10
1/7/2022	2021	CITY OF SEBREE	1,712.01
1/7/2022	2021	CITY OF SHELBYVILLE	27,138.54
1/7/2022	2021	CITY OF SPRINGFIELD KY	4,900.61
1/7/2022	2021	CITY OF WHITESVILLE	546.49
1/7/2022	2021	DANVILLE BOARD OF EDUCATION	128,640.23
1/7/2022	2021	DIXON CITY OF	1,212.45
1/7/2022	2021	FRANKLIN KENTUCKY CITY OF	8,968.49
1/7/2022	2021	GARRARD COUNTY SHERIFF	53,390.26
1/7/2022	2021	HANSON CITY OF	742.30
1/7/2022	2021	HANSON CITY OF	1.47
1/7/2022	2021	HART COUNTY	65,945.85
1/7/2022	2021	HENDERSON CITY OF	3,287.48
1/7/2022	2021	HENDERSON COUNTY SHERIFF	26,056.76
1/7/2022	2021	LINCOLN COUNTY SHERIFF	32,987.82
1/7/2022	2021	LOGAN COUNTY SHERIFF	114,041.73
1/7/2022	2021	LYON COUNTY SHERIFF	7,555.82
1/7/2022	2021	MARION COUNTY SHERIFF	173,489.50
1/7/2022	2021	MARSHALL COUNTY	29,223.59
1/7/2022	2021	MCLEAN COUNTY SHERIFF	23,783.42
1/7/2022	2021	MERCER COUNTY	132,162.12
1/7/2022	2021	MUHLENBERG COUNTY SHERIFF	93,366.19
1/7/2022	2021	MUNFORDVILLE CITY OF	5,598.94
1/7/2022	2021	NORTONVILLE CITY OF	1,928.93
1/7/2022	2021	OHIO COUNTY	32,322.31
1/7/2022	2021	PERRYVILLE CITY OF	835.42
1/7/2022	2021	POWDERLY CITY OF	621.09
1/7/2022	2021	SHELBY COUNTY SHERIFF	441,592.58
1/7/2022	2021	SIMPSON COUNTY	94,702.36
1/7/2022	2021	SMITHS GROVE CITY OF	2,843.27
1/7/2022	2021	TODD COUNTY SHERIFF	15,318.81
1/7/2022	2021	TRIGG COUNTY SHERIFF	18,909.58
1/7/2022	2021	WARREN COUNTY	281,663.73
1/7/2022	2021	WASHINGTON COUNTY SHERIFF	45,871.52
1/7/2022	2021	WEBSTERS COUNTY SHERIFF	27,422.47
1/21/2022	2021	ANDERSON COUNTY SHERIFFS OFFICE	52,078.67
1/21/2022	2021	CITY OF EDDYVILLE	2,804.68
1/21/2022	2021	CITY OF LEBANON	12,970.47
1/21/2022	2021	CITY OF LEBANON	195.61
1/21/2022	2021	CITY OF STANFORD	2,636.85
1/21/2022	2021	CRITTENDEN COUNTY SHERIFF	71,833.95
1/21/2022	2021	FRANKLIN COUNTY	9,041.93
1/21/2022	2021	GRAVES COUNTY SHERIFF	61,106.27
1/21/2022	2021	LIVINGSTON COUNTY SHERIFF	37,607.52
1/21/2022	2021	SACRAMENTO CITY OF	580.81
2/1/2022	2021	BARREN COUNTY SHERIFF	187,501.42
2/1/2022	2021	CALHOUN CITY OF	996.93
2/1/2022	2021	CITY OF ADAIRVILLE	1,338.18
2/1/2022	2021	CITY OF CAVE CITY	4,877.53
2/1/2022	2021	CITY OF PADUCAH	472,295.46
2/1/2022	2021	DAVIESS COUNTY	570,210.77
2/1/2022	2021	GRAYSON COUNTY SHERIFF	131.39
2/1/2022	2021	GREEN COUNTY SHERIFF	32,229.36
2/1/2022	2021	HOPKINS COUNTY SHERIFF	410,701.06
2/1/2022	2021	LAWRENCEBURG CITY OF	5,448.34
2/1/2022	2021	MCCRACKEN COUNTY	199,342.30
2/1/2022	2021	WINGO CITY OF	1,968.35
2/15/2022	2021	CITY OF GLASGOW	23,420.49
2/15/2022	2021	CITY OF HARRODSBURG	8,117.10
2/15/2022	2021	CITY OF MAYFIELD	88,328.58
2/15/2022	2021	CITY OF WOODBURN	858.08
2/15/2022	2021	HAWESVILLE CITY OF	4,056.40
2/15/2022	2021	JEFFERSON COUNTY SHERIFF	50,897.79
2/15/2022	2021	SLAUGHTERS CITY OF	276.34
2/15/2022	2021	TAYLOR COUNTY	67,374.73
3/1/2022	2021	CITY OF MARION KY	13,003.05
3/1/2022	2021	GRAND RIVERS CITY OF	14,047.23
3/18/2022	2021	CHRISTIAN COUNTY SHERIFF	323,318.30
4/5/2022	2021	HUSTONVILLE CITY OF	1,347.11
4/26/2022	2021	CITY OF BOWLING GREEN KY	502,922.56
4/26/2022	2021	CITY OF LIVERMORE	601.79
4/26/2022	2021	EDMONSON COUNTY SHERIFF	3,844.08
5/13/2022	2021	CALDWELL COUNTY SHERIFF	104,917.37
5/13/2022	2021	CITY OF PRINCETON KY	14,034.90
6/1/2022	2021	CITY OF HOPKINSVILLE	72,140.98
7/29/2022	2019	CITY OF CROFTON	411.64
9/20/2022	2014	CITY OF HORSE CAVE	5,455.50
9/20/2022	2014	CITY OF LEBANON	319.22
9/20/2022	2014	CITY OF SHELBYVILLE	4,220.67
9/20/2022	2014	CITY OF SPRINGFIELD KY	107.58
9/20/2022	2014	HUSTONVILLE CITY OF	27.25
9/20/2022	2014	NORTONVILLE CITY OF	113.93
9/20/2022	2014	PERRYVILLE CITY OF	78.96
9/20/2022	2014	WASHINGTON COUNTY SHERIFF	709.13
9/20/2022	2015	CITY OF EARLINGTON	1,127.41
9/20/2022	2015	CITY OF WHITESVILLE	221.85
9/20/2022	2015	HUSTONVILLE CITY OF	9.00
9/20/2022	2015	SLAUGHTERS CITY OF	3.59
9/20/2022	2016	CITY OF HORSE CAVE	902.01
9/20/2022	2016	FORDSVILLE CITY OF	117.69
9/20/2022	2016	MUNFORDVILLE CITY OF	437.71
9/20/2022	2016	NORTONVILLE CITY OF	232.52
9/20/2022	2016	PERRYVILLE CITY OF	208.84
9/20/2022	2017	CITY OF CADIZ	470.82
9/20/2022	2017	CITY OF HARDINSBURG	619.28
9/20/2022	2017	CITY OF MORTONS GAP	100.60
9/20/2022	2017	DIXON CITY OF	100.99
9/20/2022	2017	FORDSVILLE CITY OF	473.40
9/20/2022	2018	BURGIN CITY OF	17,480.15
9/20/2022	2018	CITY OF BEAVER DAM	304.07
9/20/2022	2018	CITY OF CAVE CITY	123.13
9/20/2022	2018	CITY OF HARTFORD	36,982.41
9/20/2022	2018	CITY OF SEBREE	290.43
9/20/2022	2019	CITY OF BEAVER DAM	430.89
9/20/2022	2019	CITY OF CAVE CITY	219.40

Atmos Energy Corporation - Kentucky (Div 009)
Ad Valorem Tax Payments
For January 2021 through November 2024

Transaction Date	Tax Year	Vendor Name	Total
9/20/2022	2019	CITY OF HARTFORD	28,604.75
9/20/2022	2019	CITY OF RUSSELLVILLE	2,898.32
9/20/2022	2019	FORDSVILLE CITY OF	472.35
9/20/2022	2019	HUSTONVILLE CITY OF	904.46
9/20/2022	2019	WINGO CITY OF	541.94
10/4/2022	2014	CITY OF CROFTON	55.81
10/4/2022	2015	CITY OF GREENSBURG	345.15
10/4/2022	2017	CITY OF GREENSBURG	432.77
10/4/2022	2018	CITY OF GLASGOW	2,330.77
10/4/2022	2018	PARK CITY CITY OF	48.58
10/4/2022	2019	CITY OF GLASGOW	3,155.70
10/4/2022	2019	PARK CITY CITY OF	64.90
10/26/2022	2021	CITY OF GREENSBURG	6,608.61
10/26/2022	2022	CITY OF BOWLING GREEN KY	4,612.56
10/26/2022	2022	CITY OF BOWLING GREEN KY	563.75
10/26/2022	2022	FRANKLIN KENTUCKY CITY OF	108.00
10/26/2022	2022	HENDERSON COUNTY SHERIFF	152.73
10/26/2022	2022	SHELBY COUNTY SHERIFF	48.00
10/26/2022	2022	SIMPSON COUNTY	771.75
10/26/2022	2022	TRIPLE H AND B INVESTMENTS LLC	9,648.67
10/26/2022	2022	WARREN COUNTY	284.38
10/26/2022	2022	WARREN COUNTY	19,808.37
12/9/2022	2022	CITY OF MAYFIELD	5,510.00
12/9/2022	2022	GRAVES COUNTY SHERIFF	15,561.00
12/16/2022	2022	TRIPLE H AND B INVESTMENTS LLC	38,887.07
1/10/2023	2022	STATE OF KENTUCKY	777,479.00
2/24/2023	2022	ANDERSON COUNTY SHERIFFS OFFICE	51,755.24
2/24/2023	2022	BRECKINRIDGE COUNTY SHERIFF	26,272.81
2/24/2023	2022	BURGIN BOARD OF EDUCATION	16,898.91
2/24/2023	2022	CALDWELL COUNTY SHERIFF	126,768.34
2/24/2023	2022	CALHOUN CITY OF	947.23
2/24/2023	2022	CHRISTIAN COUNTY SHERIFF	339,019.15
2/24/2023	2022	CITY OF AUBURN	5,040.18
2/24/2023	2022	CITY OF BEAVER DAM	5,143.16
2/24/2023	2022	CITY OF CALVERT CITY	5,343.26
2/24/2023	2022	CITY OF CENTRAL CITY	6,249.09
2/24/2023	2022	CITY OF DAWSON SPRINGS	17,906.28
2/24/2023	2022	CITY OF EARLINGTON	1,992.17
2/24/2023	2022	CITY OF EDDYVILLE	3,046.15
2/24/2023	2022	CITY OF GREENSBURG	6,689.74
2/24/2023	2022	CITY OF GREENVILLE KY	13,125.37
2/24/2023	2022	CITY OF HARDINSBURG	5,714.75
2/24/2023	2022	CITY OF HARRODSBURG	8,275.08
2/24/2023	2022	CITY OF HARTFORD	10,524.86
2/24/2023	2022	CITY OF HOPKINSVILLE	73,494.27
2/24/2023	2022	CITY OF HORSE CAVE	6,433.55
2/24/2023	2022	CITY OF MADISONVILLE KY	24,474.94
2/24/2023	2022	CITY OF MAYFIELD	91,839.26
2/24/2023	2022	CITY OF RUSSELLVILLE	24,507.48
2/24/2023	2022	CITY OF SEBREE	1,605.60
2/24/2023	2022	CITY OF SHELBYVILLE	28,042.47
2/24/2023	2022	CITY OF STANFORD	3,495.49
2/24/2023	2022	CITY OF WHITESVILLE	61.40
2/24/2023	2022	CRITTENDEN COUNTY SHERIFF	73,202.28
2/24/2023	2022	DAVISS COUNTY	600,752.00
2/24/2023	2022	DIXON CITY OF	1,169.29
2/24/2023	2022	FRANKLIN COUNTY	9,139.77
2/24/2023	2022	GARRARD COUNTY SHERIFF	65,889.55
2/24/2023	2022	GRAVES COUNTY SHERIFF	63,172.84
2/24/2023	2022	GRAYSON COUNTY SHERIFF	131.85
2/24/2023	2022	GREEN COUNTY SHERIFF	33,437.56
2/24/2023	2022	HANCOCK COUNTY SHERIFF	20,883.05
2/24/2023	2022	HART COUNTY	66,922.93
2/24/2023	2022	HAWESVILLE CITY OF	4,151.11
2/24/2023	2022	HENDERSON CITY OF	3,284.68
2/24/2023	2022	HENDERSON COUNTY SHERIFF	27,370.68
2/24/2023	2022	HOPKINS COUNTY SHERIFF	528,614.51
2/24/2023	2022	JEFFERSON COUNTY SHERIFF	48,217.96
2/24/2023	2022	LAWRENCEBURG CITY OF	5,554.37
2/24/2023	2022	LINCOLN COUNTY SHERIFF	37,869.92
2/24/2023	2022	LIVINGSTON COUNTY SHERIFF	38,924.99
2/24/2023	2022	LOGAN COUNTY SHERIFF	133,176.72
2/24/2023	2022	LYON COUNTY SHERIFF	8,152.12
2/24/2023	2022	MARSHALL COUNTY	29,792.59
2/24/2023	2022	MCCRACKEN COUNTY	217,601.19
2/24/2023	2022	MCLEAN COUNTY SHERIFF	24,665.14
2/24/2023	2022	MERCER COUNTY	134,612.54
2/24/2023	2022	MUHLENBERG COUNTY SHERIFF	94,895.86
2/24/2023	2022	MUNFORDVILLE CITY OF	5,624.43
2/24/2023	2022	OHIO COUNTY	34,546.76
2/24/2023	2022	POWDERLY CITY OF	644.76
2/24/2023	2022	SACRAMENTO CITY OF	661.43
2/24/2023	2022	SHELBY COUNTY SHERIFF	441,834.45
2/24/2023	2022	SIMPSON COUNTY	106,046.81
2/24/2023	2022	SMITHS GROVE CITY OF	3,020.14
2/24/2023	2022	TRIGG COUNTY SHERIFF	20,795.16
2/24/2023	2022	WARREN COUNTY	310,087.68
2/24/2023	2022	WASHINGTON COUNTY SHERIFF	55,350.69
2/24/2023	2022	WASHINGTON COUNTY SHERIFF	6,510.46
2/24/2023	2022	WASHINGTON COUNTY SHERIFF	(6,510.46)
2/24/2023	2022	WASHINGTON COUNTY SHERIFF	(55,350.69)
2/24/2023	2022	WEBSTERS COUNTY SHERIFF	29,537.44
2/24/2023	2022	WINGO CITY OF	2,012.05
3/10/2023	2022	BARREN COUNTY SHERIFF	194,769.82
3/10/2023	2022	CITY OF ADAIRVILLE	1,612.85
3/10/2023	2022	CITY OF CLOVERPORT	4,218.76
3/10/2023	2022	CITY OF CROFTON	7,241.34
3/10/2023	2022	CITY OF ELKTON	4,259.44
3/10/2023	2022	CITY OF MARION KY	13,266.88
3/10/2023	2022	CITY OF MORTONS GAP	799.06
3/10/2023	2022	CITY OF OWENSBORO	535,177.13
3/10/2023	2022	CITY OF PADUCAH	500,304.18
3/10/2023	2022	CITY OF PRINCETON KY	18,772.63
3/10/2023	2022	EDMONSON COUNTY SHERIFF	4,025.56
3/10/2023	2022	MARION COUNTY SHERIFF	171,855.98
3/10/2023	2022	TODD COUNTY SHERIFF	15,634.47
3/14/2023	2022	CITY OF SPRINGFIELD KY	6,510.46
3/14/2023	2022	WASHINGTON COUNTY SHERIFF	55,350.69
3/28/2023	2022	CITY OF LIVERMORE	598.11
3/28/2023	2022	HANSON CITY OF	1.30
3/28/2023	2022	HANSON CITY OF	787.84
3/28/2023	2022	SLAUGHTERS CITY OF	552.75
4/11/2023	2022	BURGIN CITY OF	4,425.27
4/11/2023	2022	CITY OF BOWLING GREEN KY	559,129.75
4/11/2023	2022	CITY OF GLASGOW	25,555.14
4/11/2023	2022	MARION COUNTY SHERIFF	3,507.26
4/18/2023	2021	HANCOCK COUNTY SHERIFF	20,535.06
4/25/2023	2022	DANVILLE BOARD OF EDUCATION	134,099.14
5/9/2023	2022	BOYLE COUNTY CLERK	88,230.89
5/9/2023	2022	FRANKLIN KENTUCKY CITY OF	10,517.96
5/9/2023	2022	NORTONVILLE CITY OF	2,021.52
5/9/2023	2022	PERRYVILLE CITY OF	845.56
10/27/2023	2023	CITY OF BOWLING GREEN KY	563.75
10/27/2023	2023	CITY OF BOWLING GREEN KY	4,612.50
10/27/2023	2023	FRANKLIN KENTUCKY CITY OF	108.90
10/27/2023	2023	HENDERSON COUNTY SHERIFF	153.61

Atmos Energy Corporation - Kentucky (Div 009)
Ad Valorem Tax Payments
For January 2021 through November 2024

Transaction Date	Tax Year	Vendor Name	Total
10/27/2023	2023	SHELBY COUNTY SHERIFF	48.00
10/27/2023	2023	SIMPSON COUNTY	821.14
10/27/2023	2023	TRIPLE H AND B INVESTMENTS LLC	9,648.67
11/18/2023	2023	CITY OF MAYFIELD	4,560.00
11/18/2023	2023	GRAVES COUNTY SHERIFF	15,276.00
11/18/2023	2023	TRIPLE H AND B INVESTMENTS LLC	38,037.69
11/18/2023	2023	WARREN COUNTY	21,218.84
11/18/2023	2023	WARREN COUNTY	303.93
1/9/2024	2022	CITY OF LEBANON	13,219.04
1/9/2024	2022	CITY OF LEBANON	360.35
1/31/2024	2022	GROUPED REFUND	(2,543.31)
2/1/2024	2020	STATE OF KENTUCKY	401,548.28
2/1/2024	2021	STATE OF KENTUCKY	235,143.53
2/6/2024	2022	STATE OF KENTUCKY	172,063.62
2/13/2024	2020	ANDERSON COUNTY SHERIFFS OFFICE	4,795.84
2/13/2024	2020	BOYLE COUNTY CLERK	22,910.81
2/13/2024	2020	BRECKINRIDGE COUNTY SHERIFF	2,071.42
2/13/2024	2020	CALHOUN CITY OF	103.15
2/13/2024	2020	CITY OF CALVERT CITY	731.18
2/13/2024	2020	CITY OF CENTRAL CITY	833.39
2/13/2024	2020	CITY OF EDDYVILLE	164.19
2/13/2024	2020	CITY OF GREENVILLE KY	1,064.75
2/13/2024	2020	CITY OF MAYFIELD	15,714.83
2/13/2024	2020	CITY OF SEBREE	1,838.24
2/13/2024	2020	CITY OF SHELBYVILLE	6,449.54
2/13/2024	2020	CITY OF SPRINGFIELD KY	509.43
2/13/2024	2020	DANVILLE BOARD OF EDUCATION	38,390.32
2/13/2024	2020	DAVISS COUNTY	109,340.30
2/13/2024	2020	GRAVES COUNTY SHERIFF	10,682.45
2/13/2024	2020	GRAYSON COUNTY SHERIFF	6.50
2/13/2024	2020	HAWESVILLE CITY OF	680.10
2/13/2024	2020	HENDERSON CITY OF	463.70
2/13/2024	2020	HENDERSON COUNTY SHERIFF	1,971.64
2/13/2024	2020	JEFFERSON COUNTY SHERIFF	2,465.04
2/13/2024	2020	LAWRENCEBURG CITY OF	690.14
2/13/2024	2020	LINCOLN COUNTY SHERIFF	2,169.55
2/13/2024	2020	LIVINGSTON COUNTY SHERIFF	2,773.06
2/13/2024	2020	LYON COUNTY SHERIFF	525.42
2/13/2024	2020	MARSHALL COUNTY	7,084.09
2/13/2024	2020	MCLEAN COUNTY SHERIFF	2,091.18
2/13/2024	2020	MERCER COUNTY	9,208.31
2/13/2024	2020	MUHLENBERG COUNTY SHERIFF	8,267.20
2/13/2024	2020	POWDERLY CITY OF	85.05
2/13/2024	2020	SACRAMENTO CITY OF	229.96
2/13/2024	2020	SHELBY COUNTY SHERIFF	41,863.16
2/13/2024	2020	SLAUGHTERS CITY OF	21.15
2/13/2024	2020	WARREN COUNTY	44,146.48
2/13/2024	2020	WASHINGTON COUNTY SHERIFF	3,993.22
2/13/2024	2021	ANDERSON COUNTY SHERIFFS OFFICE	1,495.30
2/13/2024	2021	BOYLE COUNTY CLERK	19,321.67
2/13/2024	2021	BRECKINRIDGE COUNTY SHERIFF	419.93
2/13/2024	2021	CALHOUN CITY OF	45.37
2/13/2024	2021	CITY OF CALVERT CITY	404.75
2/13/2024	2021	CITY OF CENTRAL CITY	240.84
2/13/2024	2021	CITY OF GREENVILLE KY	259.07
2/13/2024	2021	CITY OF MAYFIELD	10,131.50
2/13/2024	2021	CITY OF SEBREE	142.57
2/13/2024	2021	CITY OF SHELBYVILLE	4,324.61
2/13/2024	2021	CRITTENDEN COUNTY SHERIFF	402.78
2/13/2024	2021	DANVILLE BOARD OF EDUCATION	30,112.23
2/13/2024	2021	DAVISS COUNTY	64,415.24
2/13/2024	2021	GRAVES COUNTY SHERIFF	6,334.52
2/13/2024	2021	HAWESVILLE CITY OF	298.31
2/13/2024	2021	HENDERSON CITY OF	294.77
2/13/2024	2021	HENDERSON COUNTY SHERIFF	792.50
2/13/2024	2021	LAWRENCEBURG CITY OF	306.16
2/13/2024	2021	LINCOLN COUNTY SHERIFF	1,921.80
2/13/2024	2021	LIVINGSTON COUNTY SHERIFF	464.01
2/13/2024	2021	LYON COUNTY SHERIFF	54.99
2/13/2024	2021	MARSHALL COUNTY	5,132.46
2/13/2024	2021	MCLEAN COUNTY SHERIFF	815.10
2/13/2024	2021	MERCER COUNTY	910.02
2/13/2024	2021	MUHLENBERG COUNTY SHERIFF	2,287.05
2/13/2024	2021	POWDERLY CITY OF	31.66
2/13/2024	2021	SACRAMENTO CITY OF	94.49
2/13/2024	2021	SHELBY COUNTY SHERIFF	16,759.63
2/13/2024	2021	WARREN COUNTY	25,439.40
2/13/2024	2022	ANDERSON COUNTY SHERIFFS OFFICE	(2,242.93)
2/13/2024	2022	BOYLE COUNTY CLERK	14,437.01
2/13/2024	2022	BRECKINRIDGE COUNTY SHERIFF	(1,473.04)
2/13/2024	2022	CALHOUN CITY OF	(15.96)
2/13/2024	2022	CITY OF CALVERT CITY	(9.55)
2/13/2024	2022	CITY OF GREENVILLE KY	(640.41)
2/13/2024	2022	CITY OF MAYFIELD	4,093.45
2/13/2024	2022	CITY OF SEBREE	20.33
2/13/2024	2022	CITY OF SHELBYVILLE	2,444.99
2/13/2024	2022	DANVILLE BOARD OF EDUCATION	21,613.68
2/13/2024	2022	DAVISS COUNTY	14,809.04
2/13/2024	2022	GRAVES COUNTY SHERIFF	1,837.89
2/13/2024	2022	HAWESVILLE CITY OF	(5.92)
2/13/2024	2022	HENDERSON CITY OF	(45.61)
2/13/2024	2022	HENDERSON COUNTY SHERIFF	709.00
2/13/2024	2022	HUSTONVILLE CITY OF	1,280.42
2/13/2024	2022	LAWRENCEBURG CITY OF	(105.98)
2/13/2024	2022	LINCOLN COUNTY SHERIFF	(2,677.07)
2/13/2024	2022	LIVINGSTON COUNTY SHERIFF	(2,289.44)
2/13/2024	2022	MARSHALL COUNTY	2,613.36
2/13/2024	2022	MERCER COUNTY	(8,658.47)
2/13/2024	2022	MUHLENBERG COUNTY SHERIFF	(4,360.85)
2/13/2024	2022	SACRAMENTO CITY OF	53.74
2/13/2024	2022	SHELBY COUNTY SHERIFF	(15,534.03)
2/13/2024	2022	WARREN COUNTY	12,587.86
2/13/2024	2023	STATE OF KENTUCKY	754,554.21
2/20/2024	2020	STATE OF KENTUCKY	491.92
2/27/2024	2020	CHRISTIAN COUNTY SHERIFF	42,885.59
2/27/2024	2020	CITY OF BEAVER DAM	672.94
2/27/2024	2020	CITY OF GREENSBURG	89.04
2/27/2024	2020	CITY OF HORSE CAVE	154.23
2/27/2024	2020	CITY OF LIVERMORE	241.25
2/27/2024	2020	CITY OF OWENSBORO	302,245.37
2/27/2024	2020	CITY OF STANFORD	282.65
2/27/2024	2020	FRANKLIN COUNTY	602.09
2/27/2024	2020	GREEN COUNTY SHERIFF	1,697.65
2/27/2024	2020	HANCOCK COUNTY SHERIFF	540.24
2/27/2024	2020	HUSTONVILLE CITY OF	187.85
2/27/2024	2020	MUNFORDVILLE CITY OF	332.70
2/27/2024	2020	OHIO COUNTY	3,098.85
2/27/2024	2020	PERRYVILLE CITY OF	833.88
2/27/2024	2020	SIMPSON COUNTY	434.89
2/27/2024	2020	TRIGG COUNTY SHERIFF	3,441.57
2/27/2024	2020	WEBSTERS COUNTY SHERIFF	2,437.79
2/27/2024	2020	WINGO CITY OF	388.50
2/27/2024	2021	CALDWELL COUNTY SHERIFF	8,515.90
2/27/2024	2021	CITY OF HARRODSBURG	514.29
2/27/2024	2021	CITY OF HORSE CAVE	91.35
2/27/2024	2021	HART COUNTY	35.33

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Transaction Date	Tax Year	Vendor Name	Total
2/27/2024	2021	PERRYVILLE CITY OF	11.42
2/27/2024	2021	SIMPSON COUNTY	1,198.56
2/27/2024	2021	WASHINGTON COUNTY SHERIFF	1,498.90
2/27/2024	2021	WEBSTERS COUNTY SHERIFF	1,018.90
2/28/2024	2022	GROUPED REFUND	(974.90)
2/28/2024	2022	GROUPED REFUND	(1,797.16)
3/15/2024	2020	CALDWELL COUNTY SHERIFF	11,954.85
3/15/2024	2020	EDMONSON COUNTY SHERIFF	335.75
3/15/2024	2021	CITY OF HARDINSBURG	79.43
3/15/2024	2021	GREEN COUNTY SHERIFF	1,082.09
3/15/2024	2021	SLAUGHTERS CITY OF	47.60
3/15/2024	2022	BARREN COUNTY SHERIFF	42,378.40
3/15/2024	2022	CITY OF WOODBURN	822.56
3/15/2024	2022	JUNCTION CITY CITY OF	1,772.67
3/15/2024	2022	LINCOLN COUNTY SHERIFF	241.73
3/19/2024	2020	HART COUNTY	4,094.76
3/31/2024	2021	GROUPED REFUND	(1.58)
3/31/2024	2022	GROUPED REFUND	(1,289.90)
3/31/2024	2022	GROUPED REFUND	(55,882.38)
4/9/2024	2020	CAMPBELLSVILLE INDEPENDENT SCHOOL BRD	17,335.61
4/9/2024	2021	CAMPBELLSVILLE INDEPENDENT SCHOOL BRD	10,632.89
4/9/2024	2021	CITY OF CAMPBELLSVILLE	7,803.00
4/9/2024	2021	CITY OF GLASGOW	7,134.77
4/9/2024	2021	CITY OF LEBANON	2,301.72
4/9/2024	2021	EDMONSON COUNTY SHERIFF	65.31
4/9/2024	2021	TAYLOR COUNTY	20,296.97
4/9/2024	2022	CAMPBELLSVILLE INDEPENDENT SCHOOL BRD	92,739.01
4/9/2024	2022	CITY OF CAMPBELLSVILLE	27,454.24
4/9/2024	2022	EDMONSON COUNTY SHERIFF	3,107.03
4/9/2024	2022	MARION COUNTY SHERIFF	24,931.56
4/9/2024	2022	TAYLOR COUNTY	71,857.81
4/9/2024	2023	ANDERSON COUNTY SHERIFFS OFFICE	38,360.58
4/9/2024	2023	BOYLE COUNTY CLERK	81,931.63
4/9/2024	2023	BRECKINRIDGE COUNTY SHERIFF	19,738.04
4/9/2024	2023	BURGIN BOARD OF EDUCATION	12,473.91
4/9/2024	2023	CALDWELL COUNTY SHERIFF	102,213.95
4/9/2024	2023	CHRISTIAN COUNTY SHERIFF	264,782.58
4/9/2024	2023	CITY OF ADAIRVILLE	1,265.77
4/9/2024	2023	CITY OF BEAVER DAM	4,196.52
4/9/2024	2023	CITY OF CENTRAL CITY	4,913.77
4/9/2024	2023	CITY OF EDDYVILLE	2,042.79
4/9/2024	2023	CITY OF GREENVILLE KY	11,154.60
4/9/2024	2023	CITY OF HARDINSBURG	3,899.30
4/9/2024	2023	CITY OF HORSE CAVE	186.72
4/9/2024	2023	CITY OF HORSE CAVE	4,094.98
4/9/2024	2023	CITY OF LIVERMORE	469.83
4/9/2024	2023	CITY OF MAYFIELD	69,396.47
4/9/2024	2023	CITY OF OWENSBORO	472,192.40
4/9/2024	2023	CITY OF SEBREE	1,258.91
4/9/2024	2023	CITY OF SHELBYVILLE	24,317.75
4/9/2024	2023	CITY OF SPRINGFIELD KY	5,104.02
4/9/2024	2023	CITY OF STANFORD	3,143.65
4/9/2024	2023	CRITTENDEN COUNTY SHERIFF	56,602.73
4/9/2024	2023	DANVILLE BOARD OF EDUCATION	119,140.02
4/9/2024	2023	DAVISS COUNTY	515,922.47
4/9/2024	2023	DIXON CITY OF	878.46
4/9/2024	2023	GARRARD COUNTY SHERIFF	47,921.17
4/9/2024	2023	GRAVES COUNTY SHERIFF	51,164.69
4/9/2024	2023	GRAYSON COUNTY SHERIFF	98.41
4/9/2024	2023	HANCOCK COUNTY SHERIFF	15,777.70
4/9/2024	2023	HENDERSON CITY OF	2,757.85
4/9/2024	2023	HENDERSON COUNTY SHERIFF	22,667.31
4/9/2024	2023	HUSTONVILLE CITY OF	1,017.47
4/9/2024	2023	LAWRENCEBURG CITY OF	4,074.08
4/9/2024	2023	LINCOLN COUNTY SHERIFF	31,743.17
4/9/2024	2023	LIVINGSTON COUNTY SHERIFF	31,004.01
4/9/2024	2023	LOGAN COUNTY SHERIFF	99,938.94
4/9/2024	2023	LYON COUNTY SHERIFF	5,900.28
4/9/2024	2023	MCLEAN COUNTY SHERIFF	18,898.05
4/9/2024	2023	MERCER COUNTY	101,171.96
4/9/2024	2023	MUHLENBERG COUNTY SHERIFF	76,755.14
4/9/2024	2023	OHIO COUNTY	26,779.65
4/9/2024	2023	POWDERLY CITY OF	500.15
4/9/2024	2023	SACRAMENTO CITY OF	567.16
4/9/2024	2023	SHELBY COUNTY SHERIFF	338,829.04
4/9/2024	2023	SIMPSON COUNTY	102,000.58
4/9/2024	2023	SMITHS GROVE CITY OF	2,208.45
4/9/2024	2023	TAYLOR COUNTY	56,096.52
4/9/2024	2023	TRIGG COUNTY SHERIFF	17,127.47
4/9/2024	2023	WARREN COUNTY	266,617.99
4/9/2024	2023	WASHINGTON COUNTY SHERIFF	41,895.65
4/9/2024	2023	WEBSTERS COUNTY SHERIFF	23,157.12
4/16/2024	2022	CITY OF LEBANON	298.75
4/16/2024	2023	CITY OF LIVERMORE	469.83
4/16/2024	2023	CITY OF SPRINGFIELD KY	5,104.02
4/23/2024	2020	GREEN COUNTY SHERIFF	3,128.94
4/23/2024	2022	CITY OF CADIZ	4,776.78
4/23/2024	2023	BARREN COUNTY SHERIFF	155,895.29
4/23/2024	2023	CALHOUN CITY OF	726.91
4/23/2024	2023	CITY OF GREENSBURG	5,050.45
4/23/2024	2023	CITY OF PRINCETON KY	15,361.40
4/23/2024	2023	CITY OF WOODBURN	650.77
4/23/2024	2023	GREEN COUNTY SHERIFF	25,484.92
4/23/2024	2023	HART COUNTY	48,065.29
4/23/2024	2023	MUNFORDVILLE CITY OF	72.27
4/23/2024	2023	MUNFORDVILLE CITY OF	3,953.05
4/23/2024	2023	TODD COUNTY SHERIFF	11,939.61
4/23/2024	2023	WINGO CITY OF	1,636.16
4/30/2024	2022	GROUPED REFUND	(298.75)
4/30/2024	2022	GROUPED REFUND	(1,697.65)
4/30/2024	2022	GROUPED REFUND	(12,543.65)
4/30/2024	2022	GROUPED REFUND	(1,483.85)
4/30/2024	2022	GROUPED REFUND	(3,264.81)
5/7/2024	2021	CITY OF CADIZ	434.18
5/7/2024	2023	CITY OF DAWSON SPRINGS	15,317.04
5/7/2024	2023	CITY OF ELKTON	3,134.51
5/7/2024	2023	CITY OF HARRODSBURG	5,928.89
5/7/2024	2023	CITY OF RUSSELLVILLE	18,381.06
5/7/2024	2023	CITY OF SIMPSONVILLE	1.14
5/7/2024	2023	FRANKLIN COUNTY	7,011.53
5/7/2024	2023	FRANKLIN KENTUCKY CITY OF	10,366.73
5/7/2024	2023	MCCRACKEN COUNTY	176,079.80
5/17/2024	2021	MCCRACKEN COUNTY	48,744.63
5/17/2024	2022	MCCRACKEN COUNTY	1,644.98
5/17/2024	2023	CAMPBELLSVILLE INDEPENDENT SCHOOL BRD	72,304.43
5/17/2024	2023	CITY OF MADISONVILLE KY	19,865.66
6/11/2024	2020	CITY OF PADUCAH	66,535.84
6/11/2024	2021	CITY OF PADUCAH	38,069.88
6/11/2024	2022	CITY OF PADUCAH	4,839.10
6/11/2024	2023	CITY OF AUBURN	3,520.10
6/11/2024	2023	CITY OF GLASGOW	20,983.52
6/11/2024	2023	CITY OF PADUCAH	403,658.79
6/11/2024	2023	SLAUGHTERS CITY OF	420.55
6/30/2024	2022	GROUPED REFUND	(16,367.92)
7/9/2024	2020	CRITTENDEN COUNTY SHERIFF	4,626.45
7/12/2024	2020	FORDSVILLE CITY OF	514.13

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7/12/2024	2021	FORDSVILLE CITY OF	505.80
7/12/2024	2022	CITY OF PRINCETON KY	4,364.84
7/12/2024	2022	FORDSVILLE CITY OF	521.60
7/19/2024	2020	CITY OF MARION KY	760.66
7/19/2024	2020	CRITTENDEN COUNTY SHERIFF	971.55
7/19/2024	2023	CITY OF MORTONS GAP	619.24
7/31/2024	2022	GROUPED REFUND	(1,431.29)
7/31/2024	2022	GROUPED REFUND	(974.69)
8/13/2024	2020	CITY OF CAVE CITY	299.98
8/13/2024	2020	CITY OF HARTFORD	43,633.53
8/13/2024	2020	FRANKLIN KENTUCKY CITY OF	773.33
8/13/2024	2021	CITY OF CAVE CITY	(5.71)
8/13/2024	2021	CITY OF HARTFORD	16,615.27
8/13/2024	2021	DIXON CITY OF	2.08
8/13/2024	2022	CITY OF CAVE CITY	4,449.80
8/13/2024	2023	CITY OF CAVE CITY	3,508.56
8/13/2024	2023	CITY OF MADISONVILLE KY	108.00
8/30/2024	2022	GROUPED REFUND	(77.62)
8/30/2024	2022	GROUPED REFUND	(4,782.76)
9/6/2024	2020	DIXON CITY OF	75.68
9/6/2024	2023	HOPKINS COUNTY SHERIFF	481,016.55
9/6/2024	2023	MARION COUNTY SHERIFF	126,297.53
9/6/2024	2023	MARION COUNTY SHERIFF	5,891.28
10/8/2024	2020	CITY OF CROFTON	7,812.22
10/8/2024	2020	CITY OF HOPKINSVILLE	11,303.97
10/8/2024	2020	CITY OF WOODBURN	69.40
10/8/2024	2020	GRAND RIVERS CITY OF	15,081.90
10/8/2024	2020	HOPKINS COUNTY SHERIFF	79,345.89
10/8/2024	2020	PARK CITY CITY OF	79.15
10/8/2024	2021	CITY OF CROFTON	7,028.47
10/8/2024	2021	PARK CITY CITY OF	136.85
10/8/2024	2022	GRAND RIVERS CITY OF	13,551.75
10/8/2024	2022	PARK CITY CITY OF	139.57
10/8/2024	2023	CITY OF CROFTON	5,088.81
10/25/2024	2020	CITY OF DAWSON SPRINGS	1,616.74
10/25/2024	2020	CITY OF MADISONVILLE KY	13,237.46
10/25/2024	2020	CITY OF MORTONS GAP	65.77
10/25/2024	2021	OHIO COUNTY	1,080.28
10/25/2024	2024	FRANKLIN KENTUCKY CITY OF	99.90
10/25/2024	2024	HENDERSON COUNTY SHERIFF	152.55
10/25/2024	2024	SHELBY COUNTY SHERIFF	48.00
10/25/2024	2024	SIMPSON COUNTY	780.57
10/25/2024	2024	TRIPLE H AND B INVESTMENTS LLC	9,539.03
10/31/2024	2022	GROUPED REFUND	(575.76)
10/31/2024	2022	GROUPED REFUND	(55.70)
11/19/2024	2023	NORTONVILLE CITY OF	1,699.31
11/19/2024	2024	CITY OF MAYFIELD	4,351.00
11/19/2024	2024	GRAVES COUNTY SHERIFF	15,105.00
11/19/2024	2024	WARREN COUNTY	2,292.10
11/19/2024	2024	WARREN COUNTY	19,055.05
11/30/2024	2022	GROUPED REFUND	(1,802.00)

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REQUEST:

Refer to the response to AG 1-24. The question asked the Company to “Provide all support for that claim, along with a list of each such project that was denied funding, and each such customer that was denied service to support its growth. If none, then so state.” The response did not provide any evidentiary support for that claim and did not provide a list of each project denied funding and each customer denied service, or if none, the response failed to state none. Provide the information requested or, if none, then so state.

RESPONSE:

As is evident in the response to AG 1-24, Mr. Austin did not have any specific project in mind; thus, there is not a specific project that is responsive to the request as asked. However, as further noted in our response, the Kentucky Economic Development Cabinet has identified several potential projects in the areas identified in Mr. Austin’s Direct Testimony. As stated in the response to AG 1-24, Atmos Energy’s desire and commitment is to be well positioned in the future to continue to support long-term economic development in Kentucky by having available gas capacity in the areas it serves. The link provided in our original response represents examples of projects that will require gas service.

Respondent: Brannon Taylor

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REQUEST:

Refer to the response to AG 1-38. The question asked: "Confirm the Company agrees that the NOL ADIT normalization requirements apply only to method/life temporary differences on the margin used in the calculation of taxable losses in each tax year that contributed to the NOL ADIT." (emphasis added).

The response stated: "The Company agrees that the NOL ADIT normalization requirements apply to method/life temporary differences on margin used in the calculation of taxable losses in each tax year that contributed to the NOL ADIT."

The response failed to answer the question posed, which addresses whether the normalization requirements apply only to method/life depreciation temporary differences. Respond to the question posed with a confirmed or denied. If denied, provide all support found in the IRC of 1986, Treasury Regulations, or any other authoritative source relied on for your response that the normalization requirements apply to any temporary differences other than method/life differences. In addition, then list out each of the additional temporary differences and provide all support relied on to conclude that the normalization requirements apply to each of these additional temporary differences.

RESPONSE:

In response to AG 1-38, the Company could not confirm the meaning of phrase "on the margin". The Company does agree that the NOL ADIT normalization requirements of the IRC apply only to method/life temporary differences.

Respondent: Joel Multer

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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."

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- 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

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Atmos Energy Corporation, Kentucky Division
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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.]¹

"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.]² 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.

¹ 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)."

² 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)."

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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

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REQUEST:

Refer to the response to AG-DR-1-39.

- a. Confirm the Company does not have a formal Tax Allocation Agreement whereby it allocates AEC taxable income and the related tax liability among its affiliate entities and regulated utility divisions. If confirmed, then provide a copy of all other documentation that describes the allocation of AEC taxable income and the related tax liability among its affiliate entities and regulated utility divisions. If denied, then provide a copy of the formal Tax Allocation Agreement.
- b. Indicate if AEC does or has otherwise been required in an audit or other means, to prepare, develop, or otherwise calculate the following. If so, describe the circumstances that led to these calculations, the purpose for the calculations, and the use of the calculations. In addition, provide a copy of all such calculations:
 - i. the actual taxable income or taxable loss by division;
 - ii. the portion of the taxable loss caused by the excess of accelerated tax depreciation over straight line book depreciation;
 - iii. the actual NOLC by division;
 - iv. the actual NOLC by division caused by the excess of accelerated tax depreciation over straight line book depreciation;
 - v. and/or the actual NOLC DTA by division.

RESPONSE:

- a. Confirmed, the Company does not have a formal tax allocation agreement.
- b. Refer to responses below.
 - i. In connection with its financial reporting tax provision process, the Company performs a calculation of actual taxable income or loss by division; however, outside of a base regulatory filing, the Company does not perform a calculation of regulatory taxable income or loss (for example, taxable income or loss corresponding only with the revenue, expenses, assets and liabilities included within a specific regulatory filing).
 - ii. No.
 - iii. No.
 - iv. No.
 - v. No.

Respondent: Joel Multer

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REQUEST:

Refer to the response to AG-DR-1-40 (e) and (f).

- a. Identify and describe the Company's fixed asset software system.
- b. Confirm that the fixed asset software system is sufficiently detailed to identify physical plant and plant-related costs directly assigned to a division, including, but not limited to, the related tax and book depreciation for book accounting, federal and state tax returns, and ratemaking purposes. If this is not correct, then describe the source of the plant, accumulated depreciation, ADIT due to accelerated tax depreciation in excess of book depreciation, depreciation expense, current income tax expense, and deferred income tax expense reflected in the Company's filing in this proceeding for both the base year (actual and budget months) and the test year.
- c. Confirm the Company is able to query the fixed asset software system to extract actual, budget, and forecast tax depreciation and book depreciation by division by month, fiscal year, and calendar year. If confirmed, then provide the information requested in the referenced AG 1-40(e) or explain very specifically why the Company is unable to extract this information from its fixed asset software system.

RESPONSE:

- a. The company uses Power Plan as its fixed asset software system. Primarily designed for asset intensive companies, PowerPlan is a software application that supports the financial data of assets during the capital investment lifecycle of a company's fixed assets.
- b. The fixed asset software system is sufficiently detailed to identify physical plant and plant-related costs directly assigned to a division, including the related tax and book depreciation for book accounting, federal and state tax returns and ratemaking purposes. However, while the fixed asset system is able to calculate and track the temporary differences between book basis and tax basis in total for each division, the system is not currently designed to track the net cumulative amount of each individual type of temporary difference.
- c. The Company confirms that it is able to query the fixed asset system to extract actual, budget and forecast tax depreciation and book depreciation by month, fiscal year and calendar year. The Company, however, does not have the ability to query and extract tax depreciation or book depreciation by temporary difference type, for example repairs or capitalized interest.

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

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REQUEST:

Refer to the electronic workpaper provided in response to Staff DR-1-54, entitled "KY – ADIT – EDIT Tax Update June 2024," in tab ADIT 009, in following cell rows 18 and 19:

Fixed Asset Cost Adjustment	2820	FXA	FXA01	(98,674,197)
Depreciation Adjustment	2820	FXA	FXA02	(32,543,306)

- a. Describe the amounts shown on each of these rows, e.g., Fixed Asset Cost Adjustment refers to basis differences between book gross plant cost and tax basis plant cost, such as the repair allowance deduction, and identify the source of the temporary difference amounts used to calculate these DTL amounts, e.g., PowerPlant fixed asset software.
- b. Indicate for each of these rows whether the Company has the underlying detail as to the specific temporary differences and the amounts for each temporary difference and whether it has that information for each prior year and the months shown on this schedule contributing to the specific DTL temporary difference aggregated into the amounts in each row. If the Company does not have this underlying detail, then explain why it does not and why it cannot be developed or obtained via query of the fixed asset software. If the Company does have the underlying detail, then provide this level of detail for each temporary difference and related DTL and the cumulative temporary differences and related DTL through June 2024 to match the test year amount and then for each month thereafter for which actual information is available

RESPONSE:

- a. Refer to response to AG 2-10 subparts (b) and (c) for the adjustments included Fixed Asset Cost Adjustment "FXA01" and Depreciation Adjustment "FXA02". In addition, see Attachment 1 for further information on these adjustments.
The Company confirms the temporary difference is calculated in the Power Plan fixed asset system.
- b. The Company does not have the underlying details as to the specific temporary differences summarized by year. This is due to the fixed asset software system not having the detailed vintage level details required to be able to provide the level of information..

Respondent: Joel Multer

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REQUEST:

Please refer to Schedule 2, page 1 of 7 attached to Mr. D'Ascendis' direct testimony. Please provide updated S&P Capital IQ growth rates for the companies in the proxy group.

RESPONSE:

Atmos Energy Corporation	ATO-US	7.51
New Jersey Resources	NJR-US	5.60
NiSource Inc.	NI-US	7.78
Northwest Natural Holding	NWN-US	4.83
ONE Gas, Inc.	OGS-US	2.45
Spire Inc.	SR-US	6.50

Source: S&P Capital IQ as of 12/16/2024

Respondent: Dylan D'Ascendis

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Atmos Energy Corporation, Kentucky Division
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Question No. 2-15
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REQUEST:

Refer to the Company's Application and its request for authorization to issue up to 20 million shares of common stock "through and pursuant to its Long-Term Incentive Plan" in Case 2024-00392. The Company's Application in that case states:

"The types of awards that may be granted under the LTIP include incentive stock options, non-qualified stock options, stock appreciation rights, restricted stock, restricted stock units, performance shares, bonus shares, and other stock unit awards. Employees receiving cash bonuses pursuant to Atmos Energy's Annual Incentive Plan for Management have the option to convert all or a portion of the cash bonus to shares of stock issue pursuant to the LTIP."³

- a. Describe how the LTIP expense is calculated and recorded and how the shares of stock are valued and recorded when issued for each LTIP "type of award" and for employee elections to convert cash bonuses to shares of stock.
- b. Provide sample journal entries showing expense or other accounts used for the debits and the common equity or other accounts used for the credits for each LTIP "type of award" and for employee elections to convert cash bonuses to shares of stock.

RESPONSE:

- a. The income statement accounts to record restricted stock expense are 9260-07458 (performance-based), 9260-07460 (time-lapse) and 9260-07463 (management incentive plan conversion). See below for how these awards are recorded. The restricted stock is granted at the average value of the high and low stock price on the date of grant. The LTIP currently has no outstanding stock options or stock appreciation rights. As a reminder, the Company removed the performance portion of incentive compensation expenses associated with all of its employees from the cost of service (see the Direct Testimony of Greg Waller at page 31).

Long-Term Incentive Plan ("LTIP") performance-based awards are amortized on a three-year vesting. In the second or third fiscal quarter, historically in April or May of every year, a new LTIP performance-based grant is issued, and expense will be caught-up from October through the issue date of the grant. Every month after April or May, the Company will have a straight-line amortization amount for the remainder of the outstanding months. Any increase or decrease to expense will be due to an increase or decrease in the Expected Vest Factor ("EVF"), which is the performance factor based on a three-year cumulative earnings-per-share. Also, if an employee retires, the Company prorates the shares and records forfeiture expense and leaves

³ Case No. 2024-00392, Application at 1-2.

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the remaining shares at 100 EVF % in the month when the forfeiture occurs. If an employee terminates for a reason other than retirement, forfeiture expense will be recorded the month the forfeiture occurs for the entire amount of expense previously booked.

LTIP time-lapse awards are amortized on a three-year vesting. In the second or third fiscal quarter, historically in April or May of every year, a new LTIP time-lapse grant is issued, and expense will be recorded as a straight-line amortization over 36 months, with retiree eligible participant time-lapse awards being immediately charged upon grant date. Any increase in expense for the month is due to an employee meeting the retiree eligible date (55th birthday) with at least three consecutive years of service, and the expense will be fully recognized at 100%. Any decrease in expense happens when an employee forfeits their shares due to termination before the grant is fully exercised.

For the management incentive plan (MIP) participants who convert all or a portion of their cash bonus to shares of restricted stock, the bonus portion of the restricted stock is recorded to sub-account 07463 and amortized over a three-year vesting period. As with the time-lapse shares described above, if the participant is retiree eligible the expense will be fully recognized at 100%.

- b. See Attachment 1 for sample journal entries for restricted stock by type of award including performance-based, time-lapse, and bonus stock related to MIP cash award conversion.

ATTACHMENT:

AG_2-15_Att1- LTIP Journal Entry Examples.xlsx

Respondent: Emily Wiebe

Atmos Energy Corporation
Restricted Stock (LTIP) Journal Entry Examples

Time Lapse & Performance Grants -example		Shares 105 Grant price 113.83=\$11,952.15					
Co	Acct	Account Description	Subaccount	Subaccount Description	Sum of Debit	Sum of Credit	Notes
10	2110	Miscellaneous paid-In capital	00000			11,952.15	Time Lapse Grants for Co50
10	2110	Miscellaneous paid-In capital	10260	RSU Grant Value - LTIP Time Lapse	11,952.15		Time Lapse Grants for Co50

Time Lapse Expense - If participant is not Retiree Eligible example		Shares 105 Grant price 113.83=\$11,952.15					
Time Lapse 36 month vesting schedule \$11,952.15*.98=\$11,713.11/1096*30 day month=320.61 monthly expense additional 2% expense gets recorded the month the grant vest.							
Monthly Journal for non Retiree Eligible							
Co	Acct	Account Description	Subaccount	Subaccount Description	Sum of Debit	Sum of Credit	Notes
10	2110	Miscellaneous paid-In capital	10261	RSU Accumulated Amort - LTIP Time Lapse		320.61	Co50 TL expense example
50	9260	A&G-Employee pensions and benefits	07460	RSU-Long Term Incentive Plan - Time Lapse	320.61		Co50 TL expense example

Time Lapse Expense - If participant is Retiree Eligible example		Shares 105 Grant price 113.83=\$11,952.15					
Time Lapse 36 month vesting schedule - accelerate amortization for participates retiree eligible 55 years and older with 3 years of service. \$11,952.15 for Retiree Eligible 100% gets amortized date of grant or if participant becomes retiree eligible during the fiscal year the balance left gets amortized the month the participant becomes retiree eligible.							
Monthly Journal Retiree Eligible							
Co	Acct	Account Description	Subaccount	Subaccount Description	Sum of Debit	Sum of Credit	Notes
10	2110	Miscellaneous paid-In capital	10261	RSU Accumulated Amort - LTIP Time Lapse		11,952.15	Co50 TL expense example
50	9260	A&G-Employee pensions and benefits	07460	RSU-Long Term Incentive Plan - Time Lapse	11,952.15		Co50 TL expense example

Performance Grants -example		Shares 105 Grant price 113.83=\$11,952.15					
Co	Acct	Account Description	Subaccount	Subaccount Description	Sum of Debit	Sum of Credit	Notes
10	2110	Miscellaneous paid-In capital	00000			11,952.16	Performanc Grants for Co50
10	2110	Miscellaneous paid-In capital	10256	Restricted Stock Grant Value--LTIP - Performance Based	11,952.16		Performanc Grants for Co50

Performance Expense - month of Grant example Grant date May 3, 2023.		Shares 105 Grant price 113.83=\$11,952.15					
Performance 36 month vesting schedule - we amortize from beginning of FY year through date of grant and continue to amortize balance on a monthly basis until vest date. The additional 2% gets recorded to expense on vest date. \$11,952.15*.98=\$11,713.11/1095*243 (#days from Oct-day of grant day May 3)=\$2,599.35. We record expense from October through Grant date. The additional 2% expense gets recorded the month the grant vest.							
Monthly Journal for the first month of grant							
Co	Acct	Account Description	Subaccount	Subaccount Description	Sum of Debit	Sum of Credit	Notes
10	2110	Miscellaneous paid-In capital	10261	RSU Accumulated Amort - LTIP Time Lapse		2,599.35	Co50 Performance expense
50	9260	A&G-Employee pensions and benefits	07458	Restricted Stock - Long Term Incentive Plan - Performance Base	2,599.35		Co50 Performance expense

Performance Expense - after first month of grant example		Shares 105 Grant price 113.83=\$11,952.15					
Performance 36 month vesting schedule \$11,952.15*.98=\$11,713.11/1095*30 (30 day month) =320.91 The balance after initial accelerations gets recorded to expense monthly until vest date and the additional 2% gets recorded the month the grant vest.							
Monthly Journal - after grant date							
Co	Acct	Account Description	Subaccount	Subaccount Description	Sum of Debit	Sum of Credit	Notes
10	2110	Miscellaneous paid-In capital	10261	RSU Accumulated Amort - LTIP Time Lapse		320.91	Co50 Performance expense
50	9260	A&G-Employee pensions and benefits	07458	Restricted Stock - Long Term Incentive Plan - Performance Base	320.91		Co50 Performance expense

MIP 20% Grants -example		Shares 18 Grant price 104.53=\$1,881.54					
Co	Acct	Account Description	Subaccount	Subaccount Description	Sum of Debit	Sum of Credit	Notes
10	2110	Miscellaneous paid-In capital	00000			1,881.54	MIP 20% Grants for Co50
10	2110	Miscellaneous paid-In capital	10264	RSU Grant Value - MIP	1,881.54		MIP 20% Grants for Co50

MIP 100% conversion - example		Shares 90 Grant price 104.53=\$9,407.70					
If participant selects all cash no entry related to restricted stock will be necessary.							
Co	Acct	Account Description	Subaccount	Subaccount Description	Sum of Debit	Sum of Credit	Notes
10	2110	Miscellaneous paid-In capital	00000	Miscellaneous paid-In capital		9,407.70	MIP 100% conversion for Co50
10	2110	Miscellaneous paid-In capital	10264	RSU Grant Value - MIP	9,407.70		MIP 100% conversion for Co50
50	2420	Miscellaneous current and accrued liabilities	27307	Performance Plan	9,407.70		MIP 100% conversion for Co50
10	2110	Miscellaneous paid-In capital	10265	RSU Accumulated Amort - MIP		9,407.70	MIP 100% conversion for Co50

MIP 20% Grant Expense - If participant is not Retiree Eligible example		Shares 18 Grant price 104.53=\$1,881.54					
MIP 20% - 36 month vesting schedule \$1,881.54*.98=\$1,843.91/1096*30 (30 day month) =52.15 monthly expense until vest date and additional 2% expense gets recorded the month the grant vest.							
Monthly Journal for non Retiree Eligible							
Co	Acct	Account Description	Subaccount	Subaccount Description	Sum of Debit	Sum of Credit	Notes
10	2110	Miscellaneous paid-In capital	10265	RSU Accumulated Amort - MIP		50.47	Co50 MIP expense example
50	9260	A&G-Employee pensions and benefits	07463	RSU-Management Incentive Plan	50.47		Co50 MIP expense example

MIP 20% Grant Expense - If participant is Retiree Eligible example		Shares 18 Grant price 104.53=\$1,881.54					
MIP 20% - 36 month vesting schedule - accelerate amortization for participates retiree eligible 55 years and older with 3 years of service. \$1,881.54 for Retiree Eligible 100% gets amortized date of grant or if participant becomes retiree eligible during the fiscal year the balance left gets amortized the month the participant becomes retiree eligible.							
Monthly Journal Retiree Eligible							
Co	Acct	Account Description	Subaccount	Subaccount Description	Sum of Debit	Sum of Credit	Notes
10	2110	Miscellaneous paid-In capital	10265	RSU Accumulated Amort - MIP		1,881.54	Co50 MIP expense example
50	9260	A&G-Employee pensions and benefits	07463	RSU-Management Incentive Plan	1,881.54		Co50 MIP expense example

Account	Subaccount	Description
2110	00000	Miscellaneous paid-In capital
2110	10257	Restricted Stock Accumulated Amort--LTIP Performance Based
2110	10261	RSU Accumulated Amort - LTIP Time Lapse
2110	10265	RSU Accumulated Amort - MIP
2110	10256	Restricted Stock Grant Value--LTIP - Performance Based
2110	10260	RSU Grant Value - LTIP Time Lapse
2110	10264	RSU Grant Value - MIP
Expense		
9260	07458	Restricted Stock - Long Term Incentive Plan - Performance Based
9260	07460	RSU-Long Term Incentive Plan - Time Lapse
9260	07463	RSU-Management Incentive Plan