

November 3, 2025

VIA ELECTRONIC FILING

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

Re: *Application of Atmos Energy Corporation to Establish PRP Rider Rates for the Twelve Month Period Beginning October 1, 2025 - Case No. 2025-00246*

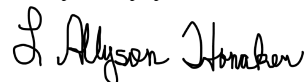
Dear Ms. Bridwell:

Please find attached for electronic filing with the Commission, Atmos Energy Corporation's responses to Commission Staff's First Request for Information, in the above-styled case.

This is to certify that the electronic filing was made on November 3, 2025 and there are no parties the Commission has excused from electronic filing procedures. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing are being made.

If you have any questions, please let me know.

Very truly yours,


L. Allyson Honaker

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY

APPLICATION OF ATMOS ENERGY)
CORPORATION TO ESTABLISH PRP)
RIDER RATES FOR THE TWELVE MONTH) Case No. 2025-00246
PERIOD BEGINNING OCTOBER 1, 2025)

CERTIFICATE AND AFFIDAVIT

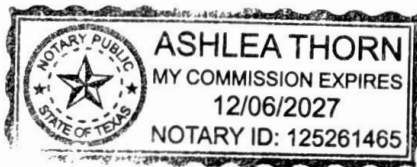
The Affiant, Joel J. Multer, being duly sworn, deposes and states that the attached responses to Commission Staff's first request for information are true and correct to the best of his knowledge and belief.

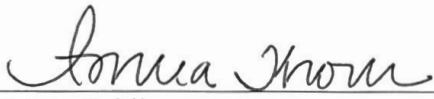


Joel J. Multer

STATE OF TEXAS
COUNTY OF DALLAS

SUBSCRIBED AND SWORN to before me by Joel J. Multer on this the 29th day of October, 2025.





Notary Public
My Commission Expires: 12/06/2027

BEFORE THE PUBLIC SERVICE COMMISSION

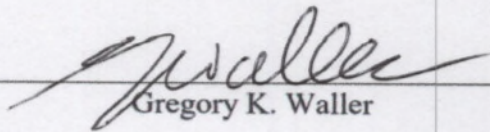
COMMONWEALTH OF KENTUCKY

APPLICATION OF ATMOS ENERGY)
CORPORATION TO ESTABLISH PRP)
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PERIOD BEGINNING OCTOBER 1, 2025)

Case No. 2025-00246

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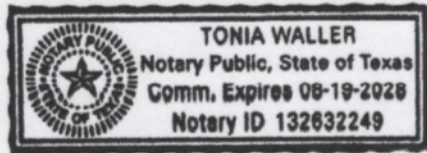
The Affiant, Gregory K. Waller, being duly sworn, deposes and states that the attached responses to Commission Staff's first request for information are true and correct to the best of his knowledge and belief.

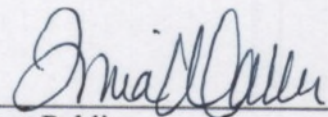


Gregory K. Waller

STATE OF TEXAS
COUNTY OF DALLAS

SUBSCRIBED AND SWORN to before me by Gregory K. Waller on this the 31st day of October, 2025.





Notary Public
My Commission Expires: 8/19/2028

Case No. 2025-00246
Atmos Energy Corporation, Kentucky Division
Staff DR Set No. 1
Question No. 1-01
Page 1 of 1

REQUEST:

Provide the expected federal tax expense or loss, on a standalone basis, for Atmos's operations for the years ending September 30, 2025, and September 30, 2026, including all revenue and expenses for regulated operations but excluding operating losses carried forward or backward from other years, and provide all work papers showing how the expected tax expense was calculated in each year in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

RESPONSE:

See confidential Attachment 1 with 9/30/2025 actual and 9/30/2026 estimated calculations.

ATTACHMENT:

Staff_1-01_ NOL Post-Hearing Update (CONFIDENTIAL).xlsx

Respondent: Joel Multer

Case No. 2025-00246
Atmos Energy Corporation, Kentucky Division
Staff DR Set No. 1
Question No. 1-02
Page 1 of 1

REQUEST:

Identify the dollar amount of all capital projects allocated to Atmos's Kentucky operations and included as an addition to plant in service for Atmos's Kentucky operations in each of the fiscal years ending September 30, 2023, September 30, 2024, and September 30, 2025.

RESPONSE:

See confidential Attachment 1 for additions closed to plant-in-service for these fiscal years.

ATTACHMENT:

Staff_1-02_Att1 - Additions to Plant Allocated to KY FY23-FY25 (CONFIDENTIAL).xlsx

Respondent: Greg Waller

Case No. 2025-00246
Atmos Energy Corporation, Kentucky Division
Staff DR Set No. 1
Question No. 1-03
Page 1 of 1

REQUEST:

Identify the total change in federal deferred tax liabilities, whether an increase or decrease, from Atmos's Kentucky operation in the fiscal year ending September 30, 2025, and provide all work papers showing how the change in deferred tax liabilities was calculated in Excel spreadsheet format with all formulas, rows, and columns fully accessible, intact, and unprotected.

RESPONSE:

See the response to Staff 1-01.

The Federal Deferred Tax Liabilities are updated through September 30, 2025 by month on tabs "Div 09 (Kentucky Division)", "Div 091(General Office)", "Div 02 (Call center)", and "Div 012 (Shared Service)" for Atmos Kentucky operations.

Respondent: Joel Multer

Case No. 2025-00246
Atmos Energy Corporation, Kentucky Division
Staff DR Set No. 1
Question No. 1-04
Page 1 of 1

REQUEST:

Identify all projected capital expenditures for Atmos's Kentucky operations in the fiscal year ending September 30, 2026.

RESPONSE:

Projected Non-PRP capital expenditures for fiscal year 2026 are outlined in attachment 1. Projected PRP capital projects for fiscal 2026 are outlined in the current PRP filing in Exhibit K-4.

ATTACHMENT:

Staff_1-04_Att1 - KY FY26 Spend Detail - Non PRP.xlsx

Respondent: Greg Waller

Case No. 2025-00246
Atmos Energy Corporation, Kentucky Division
Staff DR Set No. 1
Question No. 1-05
Page 1 of 1

REQUEST:

Refer to the application, Exhibit F. Explain whether Atmos Energy's FXA02 balances are for the Kentucky division only.

RESPONSE:

In Exhibit F, Atmos Energy's FXA02 Balances are based on the KY PRP program assets only.

Respondent: Joel Multer

Case No. 2025-00246
Atmos Energy Corporation, Kentucky Division
Staff DR Set No. 1
Question No. 1-06
Page 1 of 1

REQUEST:

Refer to the application, Exhibit B-1.

- a. Provide a detailed financial analysis demonstrating that Atmos's Kentucky operations actually generated the Net Operating Loss Carryforward (NOLC) Accumulated Deferred Income Tax (ADIT) during the periods relevant to the Pipeline Replacement Program (PRP) investments.
- b. Explain how Atmos Energy allocates the NOLC Deferred Tax Asset (DTA) from its consolidated federal tax return to the Kentucky division.

RESPONSE:

- a. The NOLC DTA balances through September 30th, 2026, which relates to both PRP as well as non-PRP, is reflected in the response to Staff DR Question 1-01 Staff_1-01_Att1 - NOL Post-Hearing Update (CONFIDENTIAL).xlsx
- b. Actual NOL carryforward amounts are derived from the Company's income tax return filings. Atmos Energy files a consolidated tax return, which includes both utility and non-regulated operations. The utility NOL represents that portion of the consolidated net operating loss resulting from utility operations, which are all included in one single legal entity, Atmos Energy Corporation. The amount of losses generated by the utility operations are referred to as utility NOL. The utility NOL is then allocated to Kentucky operation based on the composite factors in the filing.

Respondent: Joel Multer

Case No. 2025-00246
Atmos Energy Corporation, Kentucky Division
Staff DR Set No. 1
Question No. 1-07
Page 1 of 1

REQUEST:

Provide a revised PRP rate calculation that assumes no unprotected NOLC DTA adjustment. Provide this response in Excel spreadsheet format with all formulas, rows, and columns fully accessible, intact, and unprotected.

RESPONSE:

The originally filed and updated Excel models calculate the NOLC deferred tax adjustment related to current year depreciation difference (FXA02), which is protected under the Normalization rule. No NOLC was calculated for unprotected differences between book cost and tax cost adjustments.

Respondent: Joel Multer