

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

DEC 08 2011

APPLICATION OF ATMOS ENERGY)
CORPORATION TO EXTEND ITS DEMAND-)
SIDE MANAGEMENT PROGRAM AS)
AMENDED AND COST RECOVERY) CASE NO. 2011-00395
MECHANISM AS AMENDED FOR FIVE (5))
YEARS)

PUBLIC SERVICE
COMMISSION

ATTORNEY GENERAL'S REQUEST FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Request for Information to Atmos Energy Corporation, to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

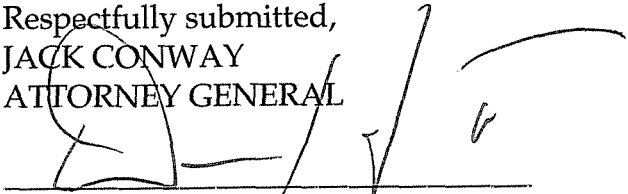
(7) If Atmos objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(10) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



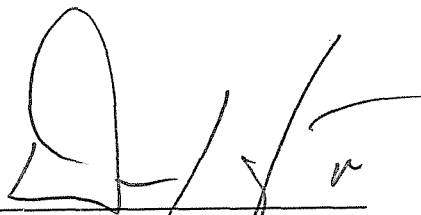
JENNIFER BLACK HANS
DENNIS G. HOWARD, II
LAWRENCE W. COOK
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE
SUITE 200
FRANKFORT KY 40601-8204
(502) 696-5453
FAX: (502) 573-8315

Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the Attorney General's Requests For Information were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, it was served by mailing a true and correct copy of the same, first class postage prepaid, to:

Mark A. Martin
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, Kentucky 42303

all on this 8th day of December, 2011.



Assistant Attorney General

Attorney General's Requests to Atmos Energy Corporation
Case No. 2011-00395

1. Reference the company's response to PSC 1-2b. Is there any audit or accounting of the moneys spent to measure the accuracy of the costs for the implementation of any DSM component, whether it be an energy audit, weatherization, etc.
 - a. If so, please provide copies of any and all such documents.
 - b. If not, why not?
2. Reference the company's response to PSC 1-3. Please provide documentation, or a reference to same if it is included in the filing, to support the company's assertion that the \$375,000 will be sufficient to address the needs of the anticipated participants applying for the DSM program.
3. Reference the company's response to PSC1- 5. Will the expiration of the American Recovery and Reinvestment Act create a need to expand the total dollars requested by Atmos for its DSM program in the future based on the history of the DSM program's expenditures prior to the Act?
4. Reference the company's response to PSC 1-6. Will the company commit to account for the company's employee related DSM expenses in the DSM program only and not include them as a "double count" as additional employee expenses related to general services? If not, why not?
5. Reference the company's response to PSC1- 7. Does the company have any actual, verifiable data to demonstrate that the education component as filed is effective? If so, please provide copies of any and all such data.
6. Reference the company's response to PSC 1-8. Please provide the average retail cost for:
 - a. a tankless water heater with an energy factor of .67 or greater and
 - b. a tankless water heater with an energy factor of .82 or greater.
7. Reference the company's response to PSC 1-10. Confirm that the commercial DSM costs will be borne exclusively by the commercial class.
8. Reference the company's response to PSC 1-13.
 - a. Why is the ten year period more appropriate in this application?
 - b. Why was a high discount rate used in this filing versus the prior filing? Please justify the answer.
 - c. Provide a list of the energy programs as referenced in the response which fail the RIM test?

Attorney General's Requests to Atmos Energy Corporation
Case No. 2011-00395

9. Reference the company's response to PSC 1-14. Is Atmos aware that other PSC jurisdictional utilities perform the California tests on the individual components of the DSM programs? If not, why not?
- a. Does the company agree that the purpose or goal of a DSM program's component is to promote energy efficiency? If not, why not?
 - b. Does the company agree that the purpose or goal of a DSM program's component is to actually achieve energy efficiency? If not, why not?
 - c. Would the company dispute the argument that a component could fail all the tests and not actually promote energy efficiency?
 - d. If the answer to the prior question is in the affirmative, then why should such a component be approved by the PSC?
 - e. Is it the company's position that a component could fail all tests yet be bootstrapped to an overall DSM program that actually achieves energy efficiency?
 - f. Does the company view those program components which fail one, several or all of the California tests as profit centers?
 - g. If the company refuses to conduct California tests on all program components, or if it refuses to provide copies of the results of California tests conducted for each program component in the subject filing, then please provide any and all data and internal studies indicating how much profit the company stands to make from any and all such program components.
10. Reference the company's response to PSC 1-15. Please provide the data since 2000 in the form illustrated in the response.
- a. Could the data currently listed in the response be skewed given the financial infusion from the American Recovery and Reinvestment Act? If not, why not?
 - b. Does Atmos have the actual number of participants of the programs since its inceptions? If not, why not?
 - c. If the answer to the above question is in the affirmative, please provide same
 - d. If the answer to the above question, please provide supporting documentation.
11. Reference the company's response to PSC 1-16. Please provide the "industry accepted algorithms adjusted for Kentucky" in excel with cells intact. If no such calculations are available in excel, please provide as much supporting data that is available.

Attorney General's Requests to Atmos Energy Corporation
Case No. 2011-00395

12. Reference the company's response to PSC 1-17c. Please provide the revised tariff noted therein by the company.

13. Reference the company's response to PSC 1-21. The response does not appear to answer the question. Please reference AG 1-9 above and provide an answer to the question.

14. Reference the company's response to PSC 1-23. The response does not appear to answer the question. Please reference AG 1-9 above and provide an answer to the question.

15. Reference the company's response to PSC 1-24. Please reference AG 1-9 above and provide an answer to the question.

16. Does the company believe it prudent for the PSC to approve a DSM program if the company cannot support actual accounting for the DSM program's components, whether in whole or in part?