

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ATMOS	)	CASE NO.
ENERGY CORPORATION FOR AN	)	2018-00281
ADJUSTMENT OF RATES	)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION  
TO THE ATTORNEY GENERAL

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due on or before April 12, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Attorney General shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Attorney General fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to respond completely and precisely.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, the Attorney General shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Explain whether Mr. Lane Kollen believes that Atmos has experienced any changes since Atmos's last rate case filing that has significantly impacted rating agencies' or investor's perceived financial, business, or regulatory risk associated with the Atmos operating company in Kentucky.

2. Explain Mr. Kollen's opinion on using forecasted risk-free interest rates in equity models in lieu of current interest rates.

3. Explain whether Mr. Kollen believes that a reasonable investor might consider both historical as well as forecasted rates.

4. Explain whether Mr. Kollen still considers a 9.7 percent return on equity for Atmos as fair and reasonable.

5. Provide all Regulatory Research Associates updates since Mr. Kollen's testimony was filed in the pending case.

6. Refer to the Direct Testimony of Lane Kollen, the workpapers with revenue requirements, rate base tab.

a. The worksheet lists the rate base per Atmos in the amount of \$430,095,330. Confirm that this amount is incorrect.

b. Confirm that the amount listed is the rate base from Atmos's previous case, Case No. 2017-00349.

c. Identify and explain any adjustments to Mr. Kollen's revenue requirement since the filing of his Direct Testimony in this proceeding.

d. Provide an updated revenue requirement and corrections to all affected schedules based upon any corrections since the filing of Mr. Kollen's Direct Testimony.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED APR 05 2019

cc: Parties of Record

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