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PUBLIC SERVICE COMMISSION

September 30, 2019

Ms. Gwen Pinson, Executive Director Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602

Re: Case No. 2019-00368

Dear Ms. Pinson:

We are filing the enclosed original and ten (10) copies of a notice under the provisions of our Gas Cost Adjustment Clause, Case No. 2013-00148. This filing contains a Petition of Confidentiality and confidential documents.

Please indicate receipt of this filing by stamping and dating this letter and returning a scanned copy by E-mail to Anthony.Croissant@atmosenergy.com.

If you have any questions, feel free to call me at 972-855-3115.

Sincerely,

Anthony Croissant Sr. Rate Administration Analyst

Enclosures



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COMMONWEALTH OF KENTUCKY BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

In the Matter of:

GAS COST ADJUSTMENT)	CASE NO.
FILING OF)	2019- 00368
ATMOS ENERGY CORPORATION)	

PETITION FOR CONFIDENTIALITY OF INFORMATION BEING FILED WITH THE KENTUCKY PUBLIC SERVICE COMMISSION

Atmos Energy Corporation ("Atmos") respectfully petitions the Kentucky Public Service Commission ("Commission") pursuant to 807 KAR 5:001 Section (13) and KRS 61.878(1)(c)1 for confidential treatment of the information which is described below and which is attached hereto. In support of this Petition, Atmos states as follows:

1. Atmos is filing its Gas Cost Adjustment ("GCA") for the quarterly period commencing on November 1, 2019 through January 31, 2020. This GCA filing contains a change to Atmos' Correction Factor (CF) as well as information pertaining to Atmos' projected gas prices. The following two attachments contain information which requires confidential treatment.

- a. The attached Exhibit D, Page 5 of 6 contains confidential information from which the actual price being paid by Atmos for natural gas to its supplier can be determined.
- b. The attached Weighted Average Cost of Gas ("WACOG") schedule in support of Exhibit C, Page 2 of 2 contains confidential information pertaining to prices projected to be paid by Atmos for purchase contracts.

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2. Information of the type described above has previously been filed by Atmos with the Commission under petitions for confidentiality. The Commission has consistently granted confidential protection to that type of information in each of the prior GCA filings in KPSC Case No. 2015-00343. The information contained in the attached WACOG schedule has also been filed with the Commission under a Petition for Confidentiality in Case No. 2015-00424.

3. KRS 61.878 (1)(c) 1. provides that "...records confidentially disclosed to an agency or required by any agency to be disclosed to it, generally recognized as confidential or proprietary, which is openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records..."shall remain confidential unless otherwise ordered by a court of competent jurisdiction. The natural gas industry is very competitive. Atmos Energy has active competitors, who could use this information to their advantage and to the direct disadvantage of Atmos.

All of the information sought to be protected as confidential, if publicly disclosed, would have serious adverse consequences to Atmos and its customers. Public disclosure of this information would impose an unfair commercial disadvantage on Atmos. Atmos has successfully negotiated an extremely advantageous gas supply contract that is very beneficial to Atmos and its ratepayers. Detailed information concerning that contract, including commodity costs, demand and transportation charges, reservations fees, etc. on specifically identified pipelines, if made available to Atmos' competitors, (including specifically non-regulated gas marketers), would clearly put Atmos to an unfair commercial disadvantage. Those competitors for gas supply would be able to gain information that is otherwise confidential about Atmos' gas purchases and transportation costs and strategies. The Commission has accordingly granted confidential protection to such information.

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4. Likewise, the information contained in the WACOG schedule in support of Exhibit C, Page 2 of 2, also constitutes sensitive, proprietary information which if publicly disclosed would put Atmos to an unfair commercial disadvantage in future negotiations.

5. Atmos would not, as a matter of company policy, disclose any of the information for which confidential protection is sought herein to any person or entity, except as required by law or pursuant to a court order or subpoena. Atmos' internal practices and policies are directed towards non-disclosure of the attached information. In fact, the information contained in the attached report is not disclosed to any personnel of Atmos except those who need to know in order to discharge their responsibility. Atmos has never disclosed such information publicly. This information is not customarily disclosed to the public and is generally recognized as confidential and proprietary in the industry.

6. There is no significant interest in public disclosure of the attached information. Any public interest in favor of disclosure of the information is outweighed by the competitive interest in keeping the information confidential.

7. The attached information is also entitled to confidential treatment because it constitutes a trade secret under the two prong test of KRS 365.880: (a) the economic value of the information as derived by not being readily ascertainable by other persons who might obtain economic value by its disclosure; and, (b) the information is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. The economic value of the information is derived by Atmos maintaining the confidentiality of the information since competitors and entities with whom Atmos transacts business could obtain economic value by its disclosure.

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8. Pursuant to 807 KAR 5:001 (13) confidentiality of the attached information should be maintained indefinitely. The statutes cited above do not allow for disclosure at any time. Given the competitive nature of the natural gas business and the efforts of non-regulated competitors to encroach upon traditional markets, it is imperative that regulated information remain protected and that the integrity of the information remain secure.

For these reasons, Atmos Energy requests that the items identified in this petition be treated as confidential. Should the Commission determine that some or all of the material is not to be given confidential protection, Atmos Energy requests a hearing prior to any public release of the information to preserve its rights to notice of the grounds for the denial and to preserve its right of appeal of the decision.

WHEREFORE, Atmos petitions the Commission to treat as confidential all of the material and information which is included in the attached volume marked "Confidential".

Respectfully submitted this 30th day of September 2019.

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Mark R. Hutchinson 611 Frederica Street Owensboro, Kentucky 42301 randy@whplawfirm.com

John N. Hughes 124 W. Todd Street Frankfort, Kentucky 40601 jnhughes@johnhughespsc.com

Attorneys for Atmos Energy Corporation

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PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:

GAS COST ADJUSTMENT) FILING OF) ATMOS ENERGY CORPORATION) Case No. 2019-00368

<u>NOTICE</u>

QUARTERLY FILING

For The Period

November 01, 2019 - January 31, 2020

Attorney for Applicant

Mark R. Hutchinson 611 Frederica Street Owensboro, Kentucky 42301

September 30, 2019

Atmos Energy Corporation, ("the Company"), is duly qualified under the laws of the Commonwealth of Kentucky to do its business. The Company is an operating public utility engaged in the business of purchasing, transporting and distributing natural gas to residential, commercial and industrial users in western and central Kentucky. The Company's principal operating office and place of business is 3275 Highland Pointe Drive, Owensboro, Kentucky 42303. Correspondence and communications with respect to this notice should be directed to:

Mark A. Martin Vice President of Rates & Regulatory Affairs Kentucky/Mid-States Division Atmos Energy Corporation 3275 Highland Pointe Drive Owensboro, Kentucky 42303

Mark R. Hutchinson Attorney for Applicant 611 Frederica Street Owensboro, Kentucky 42301

Liza Philip Manager, Rate Administration Atmos Energy Corporation 5430 LBJ Freeway, Suite 700 Dallas, Texas 75240

Anthony Croissant Sr. Rate Administration Analyst Atmos Energy Corporation 5430 LBJ Freeway, Suite 700 Dallas, Texas 75240 The Company gives notice to the Kentucky Public Service Commission, hereinafter "the Commission", pursuant to the Gas Cost Adjustment Clause contained in the Company's settlement gas rate schedules in **Case No. 2013-00148**

The Company hereby files Thirty-First Revised Sheet No. 4, Thirty-First Revised Sheet No. 5, and Thirty-First Revised Sheet No. 6 to its PSC No. 2, Rates, Rules and Regulations for Furnishing Natural Gas to become effective November 01, 2019.

The Gas Cost Adjustment (GCA) for firm sales service is \$3.9939 per Mcf and \$2.7314 per Mcf for interruptible sales service. The supporting calculations for theThirty-First Revised Sheet No. 5 are provided in the following Exhibits:

Exhibit A - Comparison of Current and Previous Gas Cost Adjustment (GCA) Cases

Exhibit B – Expected Gas Cost (EGC) Calculation

Exhibit C - Rates used in the Expected Gas Cost (EGC)

Exhibit D – Correction Factor (CF) Calculation

Exhibit E - Refund Factor (RF) Calculation

Exhibit E – Performance Based Rate Recovery Factor (PBRRF) Calculation

Since the Company's last GCA filing, Case No. 2019-00225, the following changes have occurred in its pipeline and gas supply commodity rates for the GCA period.

- The commodity rates per Mcf used are based on historical estimates and/or current data for the quarter of November 01, 2019 through January 31, 2020 as shown in Exhibit C, page 1 of 2.
- 2. The G-1 Expected Gas Cost will be approximately \$4.2754 per Mcf for the quarter of November 01, 2019 through January 31, 2020 as compared to \$4.1944 per Mcf used

for the period of August 01, 2019 through October 31, 2019. The G-2 Expected Commodity Gas Cost will be approximately \$3.0129 for the quarter November 01, 2019 through January 31, 2020 as compared to \$2.9292 for the period of August 01, 2019 through October 31, 2019.

- The Company's notice sets out a new Correction Factor of (\$0.5053) per Mcf which will remain in effect until at least January 31, 2020.
- The Refund Factor of (\$0.0000) per Mcf will remain in effect until the refund has been completed.

The GCA tariff as approved in Case No. 92-558 provides for a Correction Factor (CF) which compensates for the difference between the expected gas cost and the actual gas cost for prior periods. A revision to the GCA tariff effective December 1, 2001, Filing No. T62-1253, provides that the Correction Factor be filed on a quarterly basis. In Case No. 2013-00148, effective January 24, 2014, the Company's GCA tariff allows recovery of any gas cost which is uncollectible, to be included in each February GCA filing.

The Company is filing its updated Correction Factor that is based upon the balance in the Company's 1910 Account as of July 31, 2019 (August 2019 general ledger). The Calculation for the Correction Factor is shown on Exhibit D, Page 1 of 6. Also beginning with the January, 2014 GCA filing in compliance with tariff page 16 from the Rate Case filing (Case

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No. 2013-00148) the Company is allowed to recover the net uncollectible gas cost (net uncollectible gas cost less subsequently collected gas cost).

WHEREFORE, Atmos Energy Corporation requests this Commission, pursuant to the Commission's order in Case No. 99-070, to approve the Gas Cost Adjustment (GCA) as filed in Thirty-First Revised Sheet No. 5; and Thirty-First Revised Sheet No. 6 setting out the General Transportation Tariff Rate T-3 and T-4 for each respective sales rate for meter readings made on and after November 01, 2019.

DATED at Dallas, Texas this 30th day of September, 2019.

ATMOS ENERGY CORPORATION

By: Terall

Anthony Croissant Sr. Rate Administration Analyst Atmos Energy Corporation

FOR ENTIRE SERVICE AREA

P.S.C. KY NO. 2

THIRTY-FIRST REVISED SHEET NO. 4

ATMOS ENERGY CORPORATION NAME OF UTILITY

CANCELLING

THIRTIETH REVISED SHEET NO. 4

	Current Rate Sun Case No. 2019-00		
Firm Service			
Base Charge: Residential (G-1) Non-Residential (G-1) Transportation (T-4) Transportation Administration Fee	- 51.75 - 435.00	per meter per month per meter per month per delivery point per month per customer per meter	
Rate per Mcf ² First 300 ¹ Mcf Next 14,700 ¹ Mcf Over 15,000 Mcf	Sales (G-1) @ 5.3794 per Mcf @ 4.9517 per Mcf @ 4.7590 per Mcf	Transportation (T-4) @ 1.3855 per Mcf @ 0.9578 per Mcf @ 0.7651 per Mcf	(R, (R, (R,
<u>Interruptible Service</u> Base Charge Transportation Administration Fee		per delivery point per month per customer per meter	
<u>Rate per Mcf ²</u> First 15,000 ¹ Mcf Over 15,000 Mcf	Sales (G-2) @ 3.5641 per Mcf @ 3.3701 per Mcf	Transportation (T-3) @ 0.8327 per Mcf @ 0.6387 per Mcf	(R, (R,
considered for the purpo been achieved.	e customer (sales, transportation; fi se of determining whether the volu lers may also apply, where applica	me requirement of 15,000 Mcf has	

DATEOTIS	SOL September 50, 2019
	MONTH / DATE / YEAR
DATE EFFE	CTIVE November 1, 2019
	MONTH / DATE / YEAR
ISSUED BY	/s/ Mark A. Martin
	SIGNATURE OF OFFICER
TITLE	Vice President – Rates & Regulatory Affairs
BY AUTHOR	RITY OF ORDER OF THE PUBLIC SERVICE COMMISSION

IN CASE NO 2019-00000 DATED N/A

-)

FOR ENTIRE SERVICE AREA

P.S.C. KY NO. 2

THIRTY-FIRST REVISED SHEET NO. 5

CANCELLING

ATMOS ENERGY CORPORATION

NAME OF UTILITY

THIRTIETH REVISED SHEET NO. 5

	as Cost Adjustments		7
Ca	se No. 2019-00000		-
Applicable			
For all Mcf billed under General Sales Servi	ce (G-1) and Interruptible Sa	ales Service (G-2).	
Gas Charge = GCA			
GCA = EGC + CF + RF + F	BRRF		
Gas Cost Adjustment Components	<u> </u>	G-2	
EGC (Expected Gas Cost Component)	4.2754	3.0129	(l, l)
CF (Correction Factor)	(0.5053)	(0.5053)	(R, R)
RF (Refund Adjustment)	0.0000	0.0000	(-, -)
PBRRF (Performance Based Rate Recovery Factor)	0.2238	0.2238	(-, -)
GCA (Gas Cost Adjustment)	\$3.9939	\$2.7314	(R, R)
		· · · · · · · · · · · · · · · · · · ·	

DATE OF ISSUE	September 30, 2019	
· · · · · · · · · · · · · · · · · · ·	MONTH / DATE / YEAR	
DATE EFFECTIVE	November 1, 2019	
<u> </u>	MONTH / DATE / YEAR	
ISSUED BY	/s/ Mark A. Martin	
	SIGNATURE OF OFFICER	
TITLE Vice President –	Rates & Regulatory Affairs	
BY AUTHORITY OF OR	DER OF THE PUBLIC SERVICE COMMI	SSION

IN CASE NO 2019-00000 DATED N/A

FOR ENTIRE SERVICE AREA

P.S.C. KY NO. 2

THIRTY-FIRST REVISED SHEET NO. 6

CANCELLING

ATMOS ENERGY CORPORATION

NAME OF UTILITY

THIRTIETH REVISED SHEET NO. 6

	<u> </u>			t Transpo No. 2019-0				
The Transportat	ion Rates (T-	3 and T-4)	for each	respective	serv	ice net monthly rate	is as follows	:
System Lost an	d Unaccoun	ited gas p	ercentag	je:			1.69%	
				Simple Margin		Non- Commodity	Gross Margin	
Transportation					-			-
<u>Firm Serv</u>								
First	300	Mcf	@	\$1.3855		\$0.0000 =	\$1.3855	•
Next	14,700	Mcf	@	0.9578		0.0000 =		per Mcf
All over	15,000	Mcf	@	0.7651	+	0.0000 =	0.7651	per Mcf
	ole Service (
First	15,000	Mcf	@	\$0.8327		\$0.0000 =	\$0.8327	
All over	15,000	Mcf	@	0.6387	+	0.0000 =	0.6387	per Mcf
1								
¹ Excludes sta	ndby sales se	ervice.						
TE OF ISSUE		September	30. 2019					
	· · · · · · · · · · · · · · · · · · ·	MONTH / DA			-			
TE EFFECTIVE		November	1,2019					
		MONTH / DAT	TE / YEAR		-			
		/s/ Mark A	. Martin					
SUED BY					-			
SUED BY		SIGNATURE C	of Officer					
SUED BY								
	ent – Rates & I	Regulatory	Affairs		-			

Atmos Energy Corporation Comparison of Current and Previous Cases Sales Service

		(a)	(b)	(c)
Line		Case		
No.	Description	2019-00225	2019-00000	Difference
_		\$/Mcf	\$/Mcf	\$/Mcf
1	<u>G - 1</u>			
2				
3	Distribution Charge (per Case No. 2015-00343)			
4	First 300 Mcf	1.3855	1.3855	0.0000
5	Next 14,700 Mcf	0.9578	0.9578	0.0000
6	Over 15,000 Mcf	0.7651	0.7651	0.0000
7				
8	Gas Cost Adjustment Components			
9	EGC (Expected Gas Cost):			
10	Commodity	2.7105	2.7916	0.0811
11	Demand	1.4839	1.4838	(0.0001)
12	Total EGC	4.1944	4.2754	0.0810
13	CF (Correction Factor)	(0.4144)	(0.5053)	(0.0909)
14	RF (Refund Adjustment)	0.0000	0.0000	0.0000
15	PBRRF (Performance Based Rate Recovery Factor)	0.2238	0.2238	0.0000
16	GCA (Gas Cost Adjustment)	4.0038	3.9939	(0.0099)
17				. ,
18	Rate per Mcf (GCA included)			
19	First 300 Mcf	5.3893	5.3794	(0.0099)
20	Next 14,700 Mcf	4.9616	4.9517	(0.0099)
21	Over 15,000 Mcf	4.7689	4.7590	(0.0099)
22				· · · · ·
23				
24	<u>G - 2</u>			
25				
26	Distribution Charge (per Case No. 2015-00343)			
27	First 15,000 Mcf	0.8327	0.8327	0.0000
28	Over 15,000 Mcf	0.6387	0.6387	0.0000
29	·			
30	Gas Cost Adjustment Components			
31	EGC (Expected Gas Cost):			
32	Commodity	2.7105	2.7916	0.0811
33	Demand	0.2187	0.2213	0.0026
34	Total EGC	2.9292	3.0129	0.0837
35	CF (Correction Factor)	(0.4144)	(0.5053)	(0.0909)
36	RF (Refund Adjustment)	`0.0000´	0.0000	0.0000
37	PBRRF (Performance Based Rate Recovery Factor)	0.2238	0.2238	0.0000
38	GCA (Gas Cost Adjustment)	2.7386	2.7314	(0.0072)
39				()
40	Rate per Mcf (GCA included)			
41	First 300 Mcf	3.5713	3.5641	(0.0072)
42	Over 14,700 Mcf	3.3773	3.3701	(0.0072)
	-1			()

Atmos Energy Corporation Comparison of Current and Previous Cases Transportation Service

				(a)	(b)	(C)
Line				Cas	e No.	
No.	Description			2019-00225	2019-00000	Difference
				\$/Mcf	\$/Mcf	\$/Mcf
1	T -4 Transport	ation Serv	<u>vice / Firm Service (High Priority)</u>			
2						
3	Simple Margin	/ Distribution	on Charge (per Case No. 2015-00343)			
4	First	300	Mcf	1.3855	1.3855	0.0000
5	Next	14,700	Mcf	0.9578	0.9578	0.0000
6	Over	15,000	Mcf	0.7651	0.7651	0.0000
7						
8						
9	<u>T - 3 / Interrup</u>	tible Servi	<u>ce (Low Priority)</u>			
10						
11	Simple Margin	/ Distributio	on Charge (per Case No. 2015-00343)			
12	First	15,000	Mcf	0.8327	0.8327	0.0000
13	Over	15,000	Mcf	0.6387	0.6387	0.0000
14						

Expected Gas Cost (EGC) Calculation

		(a)	(b)	(c)	(d) Non-Co	(e) ommodity
Line No. Description		Tariff Sheet No.	Annual Units	Rate	Total	Demand
· · ·			MMbtu	\$/MMbtu	\$	\$
1 <u>SL to Zone 2</u> 2 NNS Contract # 3 Base Rate	29760	Section 4.4 - NNS	12,340,360	0.3088	3,810,703	3,810,703
4 5 Total SL to Zone 2			12,340,360		3,810,703	3,810,703
6		•				
7 <u>SL to Zone 3</u> 8 NNS Contract # 9 Base Rate 10	29762	Section 4.4 - NNS	27,757,688	0.3543	9,834,549	9,834,549
11 FT Contract <i>#</i> 12 Base Rate 13	29759	Section 4.1 - FT	6,022,500	0.2939	1,770,013	1,770,013
14 FT Contract # 15 Base Rate 16	34380	Section 4.1 - FT	3,650,000	0.2939	1,072,735	1,072,735
17 Total SL to Zone 3		-	37,430,188	-	12,677,297	12,677,297
18		-				
19 <u>Zone 1 to Zone 3</u> 20 STF Contract # 21 Base Rate 22 23	35772	Section 4.2 - STF	323,400	0.3282	106,140	106,140
24 25						
25 26 Total Zone 1 to Zone	3	-	323,400	-	106,140	106,140
27		-		-	100,140	
28 <u>SL to Zone 4</u> 29 NNS Contract # 30 Base Rate 31	29763	Section 4.4 - NNS	3,320,769	0.4190	1,391,402	1,391,402
32 FT Contract # 33 Base Rate 34	31097	Section 4.1 - FT	1,825,000	0.3670	669,775	669,775
38 Total SL to Zone 4		-	5,145,769	-	2,061,177	2,061,177
39 40 <u>Zone 2 to Zone 4</u> 41 FT Contract # 42 Base Rate 43	34674	Section 4.1 - FT	2,309,720	0.2780	642,102	642,102
44 Total Zone 2 to Zone	e 4	-	2,309,720	-	642,102	642,102
45 46 <u>Zone 3 to Zone 3</u> 47 FT Contract # 48 Base Rate 49	36773	Section 4.1 - FT	1,070,000	0.1493	159,751	159,751
50 Total Zone 3 to Zone	: 3	-	1,070,000	-	159,751	159,751
51		-	· · · · · ·	-		
52 Total SL to Zone 2 53 Total SL to Zone 3 54 Total Zone 1 to Zone 55 Total SL to Zone 4 56 Total Zone 2 to Zone 57 Total Zone 3 to Zone 58	: 4		12,340,360 37,430,188 323,400 5,145,769 2,309,720 1,070,000		3,810,703 12,677,297 106,140 2,061,177 642,102 159,751	3,810,703 12,677,297 106,140 2,061,177 642,102 159,751
59 Total Texas Gas 60		-	58,619,437	-	19,457,170	19,457,170
61 62 Total Texas Gas Are	a Non-Con	nmodity		-	19,457,170	19,457,170

Atmos Energy Corporation Expected Gas Cost (EGC) Calculation Tennessee Gas Pipeline - Non-Commodity

		(a)	(b)	(c)	(d) Non-Co	(e) ommodity
Line		Tariff	Annual			· · · · · ·
No. Description		Sheet No.	Units	Rate	Total	Demand
			MMbtu	\$/MMbtu	\$	\$
1 <u>0 to Zone 2</u>						
	546		145,000			
3 Base Rate		23		15.2547	2,211,932	2,211,932
4						
5 FT-A Contract # 9	5033		144,000			
6 Base Rate		14		15.2547	2,196,677	2,196,677
7		_				
8 Total Zone 0 to 2		_	289,000		4,408,609	4,408,609
9						
10 <u>1 to Zone 2</u>						
11 FT-A Contract # 3	00264		30,000			
12 Base Rate		14		10.3593	310,779	310,779
13			· · · · · · · · · · · · · · · · · · ·			
14 Total Zone 1 to 2		·	30,000		310,779	310,779
15						
16 <u>Gas Storage</u>						
17 Production Area:						
18 Demand		61	34,968	1.9915	69,639	69,639
19 Space Charge		61	4,916,148	0.0202	99,306	99,306
20 Market Area:						
21 Demand		61	237,408	1.4630	347,328	347,328
22 Space Charge		61 _	10,846,308	0.0200	216,926	216,926
23 Total Storage			16,034,832		733,199	733,199
24				-		
25 Total Tennessee Gas	s Area FT-G Non-Comm	odity		=	5,452,587	5,452,587

Atmos Energy Corporation Expected Gas Cost (EGC) Calculation Texas Gas Transmission - Commodity Purchases

Line		(a) T ariff	(b)	(C)	(d)	(e)		(f)
	Description	Sheet No.		Purc	hases	Rate		Total
	·			Mcf	MMbtu	\$/MMbtu		\$
,					0 000 000			
1	No Notice Service				2,222,802	0.7700	,	2 470 500
2	Indexed Gas Cost	0				2.7760	ť	3,170,500
3	Commodity (Zone 3)	Section 4.4 - NNS	1.76%			0.0490		108,917
4 5	Fuel and Loss Retention @	Section 4.18.1	1.70%		-	0.0497	6	<u>110,473</u> 3,389,890
5 6						2.0/4/	Ċ	0,009,090
7	Firm Transportation				1,818,657			
8	Indexed Gas Cost					2.7760	Ę	5,048,591
9	Base (Weighted on MDQs)					0.0442		80,385
10	ACA	Section 4.1 - FT				0.0013		2,364
11	Fuel and Loss Retention @	Section 4.18.1	1.76%			0.0497		90,387
12	0				-	2.8712	5	5,221,727
13	No Notice Storage							
14	Net (Injections)/Withdrawals							
15	Withdrawals				1,795,230	2.3150	2	4,155,957
16	Injections				0	2.7760		0
17	Commodity (Zone 3)	Section 4.4 - NNS				0.0490		87,966
18	Fuel and Loss Retention @	Section 4.18.1	1.76%			0.0497		89,223
19					1,795,230	2.4137	2	4,333,146
20								
21 22	Total Durahagaa in Tayaa Araa			-	E 936 690	2.7318	10	044 762
	Total Purchases in Texas Area			=	5,836,689	2,7310	10	5,944,763
23 24								
24 25	Used to allocate transportation ne	on-commodity						
26								
27				Annualized		Commodity		
28				MDQs in		Charge	W	eighted
29	Texas Gas			MMbtu	Allocation	\$/MMbtu	A١	verage
30	SL to Zone 2	Section 4.1 - FT	-	12,340,360	21.44%	\$0.0399	\$	0.0086
31	SL to Zone 3	Section 4.1 - FT		37,430,188	65.04%	0.0445	\$	0.0289
32	1 to Zone 3	Section 4.1 - FT		323,400	0.56%	0.0422	\$	0.0002
33	SL to Zone 4	Section 4.1 - FT		5,145,769	8.94%	0.0528	\$	0.0047
34	2 to Zone 4	Section 4.1 - FT	_	2,309,720	4.01%	0.0446	\$	0.0018
35	Total		-	57,549,437	100.0%		\$	0.0442
36								
37	Tennessee Gas							
38	0 to Zone 2	24		289,000	90.60%	\$0.0167	\$	0.0151
39	1 to Zone 2	24	-	30,000	9.40%	0.0087	<u> </u>	0.0008
40	Total			319,000 _	100.00%		\$	0.0159

Expected Gas Cost (EGC) Calculation

Tennessee Gas Pipeline - Commodity Purchases

	(a)	(b)	(c)	(d)	(e)	(f)
Line	Tariff					
No. Description	Sheet No.		Pu	rchases	Rate	Total
			Mcf	MMbtu	\$/MMbtu	\$
1 FT-A and FT-G				453,349		
2 Indexed Gas Cost					2.7760	1,258,495
3 Base Commodity (Weighted on MDQs)				0.0159	7,230
4 ACA	24				0.0013	589
5 Fuel and Loss Retention	32	2.17%			0.0616	27,926
6					2.8548	1,294,240
7						
8 <u>FT-GS</u>				0		
9 Indexed Gas Cost					2.7760	0
10 Base Rate	26				0.8518	0
11 ACA	24				0.0013	0
12 Fuel and Loss Retention	32	2.17%			0.0616	0
13					3.6907	0
14						
15 <u>Gas Storage</u>						
16 FT-A & FT-G Market Area Withdrawals	5			726,742	2.3150	1,682,408
17 FT-A & FT-G Market Area Injections				0	2.7760	0
18 Withdrawal Rate	61				0.0087	6,323
19 Injection Rate	61				0.0087	0
20 Fuel and Loss Retention	61	1.75%	_		0.0002	145
21 Total				726,742	2.3239	1,688,876
22						
23						
24			_	4 400 00 1	0.5076	0.000.4.10.
25 Total Tennessee Gas Zones			=	1,180,091	2.5279	2,983,116

Atmos Energy Corporation Expected Gas Cost (EGC) Calculation Trunkline Gas Company						Exhibit B Page 5 of 8
Commodity	(a)	(b)	(c)	(d)	(e)	(f)

Line		Tariff					
No.	Description	Sheet No.		Purc	hases	Rate	Total
				Mcf	MMbtu	\$/MMbtu	\$
	Firm Transportation						•
	2 Expected Volumes				260,500	,	
3	3 Indexed Gas Cost					2.7760	723,148
4	Base Commodity	13				0.0051	1,329
5	5 ACA	13				0.0013	339
e	Fuel and Loss Retention	13	0.24%			0.0039	1,016
7	7					2.7863	725,832
ε	3						
ę)						

Non-Commodity

(a)	(b)	(C)	(d)	(e)
		No	on-Commo	dity
Tariff	Annual			
Sheet No.	Units	Rate	Total	Demand
	MMbtu	\$/MMbtu	\$	\$
	33,750			
		5.3776	181,494	181,494
modity		•	181,494	181,494
	Tariff Sheet No.	Tariff Sheet No.Annual UnitsMMbtu33,750	TariffAnnualSheet No.UnitsRateMMbtu\$/MMbtu33,7505.3776	TariffAnnualSheet No.UnitsRateTotalMMbtu\$/MMbtu\$33,7505.3776181,494

Expected Gas Cost (EGC) Calculation Demand Charge Calculation

Line No.		(a)	(b)	(c)	(d)	(e)
. 1	Total Demand Cost:					
2	Texas Gas Transmission	\$19,457,170				
3	Midwestern	0				
4	Tennessee Gas Pipeline	5,452,587				
5	Trunkline Gas Company	181,494				
6	Total	\$25,091,251				
7		<u>*************************************</u>				
8			Allocated	Related	Monthly De	emand Charge
9	Demand Cost Allocation:	Factors	Demand	Volumes	Firm	Interruptible
10	All	0.1508	\$3,783,761	17,095,049	0.2213	0.2213
11	Firm	0.8492	21,307,490	16,877,502	1.2625	
12	Total	1.0000	\$25,091,251		1.4838	0.2213
13						
14			Volumetric	Basis for		
15		Annualized	Monthly Dem	and Charge		
16		Mcf @14.65	All	Firm		
17	Firm Service					
18	Sales:					
19	G-1	16,877,502	16,877,502	16,877,502	1.4838	
20						
21	Interruptible Service					
22	Sales:				4 4000	0.00/0
23	G-2	217,547	217,547		1.4838	0.2213
24	Terrent station Orandos					
25	Transportation Service	20.075.040				
26 27	T-3 & T-4	30,275,212				
27		47,370,260	17,095,049	16,877,502	• •	
		47,370,200	17,095,049	10,077,002		
29						
30						

W:\Rate Administration\5-Jurisdictional Files\Kentucky\GCA Filing\Current Filing\Kentucky GCA Filing 2019.11.xlsx

Exhibit B Page 6 of 8

Expected Gas Cost (EGC) Calculation Commodity - Total System

		(a)	(b)	(C)	(d)
ine					
No. Description		Purchas	es	Rate	Total
•		Mcf	MMbtu	\$/Mcf	\$
1 <u>Texas Gas Area</u>					
2 No Notice Service		2,148,755	2,222,802	2.9738	6,389,890
3 Firm Transportation		1,758,072	1,818,657	2.9701	5,221,72
4 No Notice Storage		1,735,426	1,795,230	2.4969	4,333,140
5 Total Texas Gas Area		5,642,253	5,836,689	2.8260	15,944,76
6			· · · · · ·		
7 Tennessee Gas Area					
8 FT-A and FT-G		428,661	453,349	3.0193	1,294,240
9 FT-GS		0	, 0	0.0000	
10 Gas Storage					
11 Injections		0	0	0.0000	
12 Withdrawals		687,166	726,742	2.4577	1,688,87
13		1,115,827	1,180,091	2.6735	2,983,110
14 <u>Trunkline Gas Area</u>					·
15 Firm Transportation		251,448	260,500	2.8866	725,83
16		,	,		,
17 Company Owned Storage					
18 Withdrawals		1,260,885	1,304,336	2.4137	3,043,398
19 Injections		0	, ,	0.0000	
20 Net WKG Storage		1,260,885	1,304,336	2.4137	3,043,398
21					
22					
23 Local Production		9,514	10,062	2.7760	26,41
24					
25					
26					
27 Total Commodity Purchases		8,279,927	8,591,678	2.7444	22,723,520
28					
29 Lost & Unaccounted for @	1.69%	139,930	145,199		
30	·				
31 Total Deliveries		8,139,997	8,446,479	2.7916	22,723,520
32					
33					
34					
35 Total Expected Commodity Cost		8,139,997	8,446,479	2.7916	22,723,520
36 37					

39

Expected Gas Cost (EGC) Calculation Load Factor Calculation for Demand Allocation Exhibit B Page 8 of 8

Line			
No.	Description	MCF	
	Annualized Volumes Subject to Demand Charges		
1	Sales Volume	17,095,049	
2	Transportation	0	
3	Total Mcf Billed Demand Charges	17,095,049	
4	Divided by: Days/Year	365	
5	Average Daily Sales and Transport Volumes	46,836	
6			
7	Peak Day Sales and Transportation Volume		
8	Estimated total company firm requirements for 5 degree average		
9	temperature days from Peak Day Book - with adjustments per rate filing	310,542	Mcf/Peak Day
10		<u> </u>	
11			
12	New Load Factor (line 5 / line 9)	0.1508	
13			

Atmos Energy Corporation Basis for Indexed Gas Cost For the Quarter ending January - 2020

The projected commodity price was provided by the Gas Supply Department and was based upon the following:

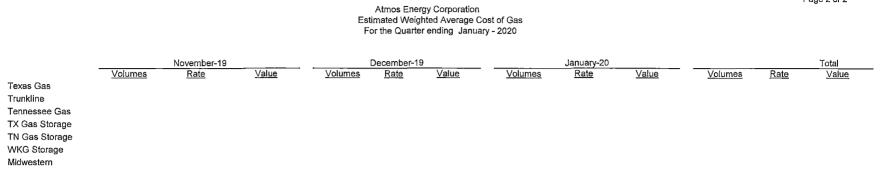
A. The Gas Supply Department reviewed the NYMEX futures close prices for the quarter of November 2019 through January 2020 during the period September 12 through September 25, 2019.

		Nov-19 (\$/MMBTU)	Dec-19 (\$/MMBTU)	Jan-20 (\$/MMBTU)
Thursday	09/12/19	2.758	2.857	2.803
Friday	09/13/19	2.800	2.898	2.842
Monday	09/16/19	2.725	2.867	2.963
Tuesday	09/17/19	2.700	2.840	2.940
Wednesday	09/18/19	2.665	2.803	2.906
Thursday	09/19/19	2.569	2.726	2.828
Friday	09/20/19	2.555	2.705	2.811
Monday	09/23/19	2.555	2.701	2.807
Tuesday	09/24/19	2.525	2.681	2.789
Wednesday	09/25/19	2.502	2.518	2.668
Average		\$2.635	\$2.760	\$2.836

B. The Company believes prices are increasing and prices for the quarter ending January 31, 2020 will settle at \$2.776 per MMBTU (based on the average of the past ten days) for the period that the GCA is to become effective.

In support of Item B, a worksheet entitled "Estimated Weighted Average Cost of Gas" has been filed under a Petition for Confidentiality in this Case.

EXHIBIT C Page 2 of 2



(This information has been filed under a Petition for Confidentiality)

WACOGs

	(a)	(b)	(C)	(d) Actual GCA	(e) Under (Over)	(f)		(g)
Line No.	Month	Actual Purchased Volume (Mcf)	Recoverable Gas Cost	Recovered Gas Cost	Recovery Amount	Adjustments		Total
1 2	May-19	585,203	\$2,053,503.74	\$3,819,895.31	(\$1,766,391.57)	\$0.00		(\$1,766,391.57)
3	June-19	531,495	\$2,895,681.61	\$2,324,081.45	\$571,600.16	\$0.00		\$571,600.16
4 5 6	July-19	627,046	\$2,415,414.96	\$2,072,014.15	\$343,400.81	\$0.00		\$343,400.81
7 8 9	Total Gas Cost Under/(Over) Red	covery	<u>\$7,364.600.31</u>	<u>\$8,215,990.91</u>	<u>(\$851,390.60)</u>	<u>\$0.00</u>		<u>(\$851,390.60)</u>
10 11	PBR Savings refl	ected in Gas Costs						
12 13 14 15 16 17 18 19 20 21 22	Total Gas Cost U Recovery from ou Over-Refunded A Prior Net Uncolle (Over)/Under Red Divided By: Tota Correction Factor	covered Gas Cost throu Inder/(Over) Recovery is utstanding Correction F Amount of Pipeline Refu ctable Gas Cost as of 1 covered Gas Cost throu Il Expected Customer S r - Part 1	for the three months actor (CF) Inds November, 2017 Igh July 2019 (Augu	ended July 2019	-	(7,746,845.30) (851,390.60) (703,511.67) 0.00 (\$9,301,747.57) 17,095,049 (\$0.5441)	Mcf / Mcf	
23 24 25 26		<u>r - Part 2</u> Gas Cost through Nov I Expected Customer S	• • •		-	<u> 662,947.63 </u> 17,095,049		
27 28	Correction Factor	r - Part 2			-	\$0.0388	/ Mcf	
20 29 30 31 32		<u>r - Total (CF)</u> alance through July 201 I Expected Customer S	ost _	(\$8,638,799.94) 17,095,049				
33 34	Correction Facto	or - Total (CF)			=	(\$0.5053)	/ Mcf	

Recoverable Gas Cost Calculation For the Three Months Ended July 2019 2019-00000

2010		GL	June-19	July-19	August-19
Line			(a)	(b) Month	(C)
No.	Description	Unit —	May-19	June-19	July-19
1	Supply Volume				
2	Pipelines:				
3	Texas Gas Transmission ¹	Mcf	0	0	0
4	Tennessee Gas Pipeline ¹	Mcf	0	0	0
5	Trunkline Gas Company ¹	Mcf	0	0	0
6	Midwestern Pipeline ¹	Mcf	0	0	0
7	Total Pipeline Supply	Mcf	0	0	0
8	Total Other Suppliers	Mcf	1,569,625	1,571,657	1,590,213
9	Off System Storage				
10	Texas Gas Transmission	Mcf	0	0	0
11	Tennessee Gas Pipeline	Mcf	0	0	0
12	System Storage				
13	Withdrawals	Mcf	678	0	0
14	Injections	Mcf	(624,534)	(634,058)	(664,283)
15	Producers	Mcf	3,514	2,918	3,630
16	Third Party Reimbursements	Mcf	0	(463)	(542)
17	Pipeline Imbalances cashed out	Mcf			
18	System Imbalances ²	Mcf	(364,080)	(408,559)	(301,973)
19	Total Supply	Mcf	585,203	531,495	627,046
20					
21	Change in Unbilled	Mcf			
22	Company Use	Mcf	0	0	0
23	Unaccounted For	Mcf	0	0	0
24	Total Purchases	Mcf	585,203	531,495	627,046

¹ Includes settlement of historical imbalances and prepaid items.

² Includes Texas Gas No-Notice Service volumes and monthly imbalances related to transportation customer activities.

Recoverable Gas Cost Calculation For the Three Months Ended July 2019 2019-00000

		GL	June-19	July-19	August-19
Line			(a)	(b) Month	(c)
No.	Description	Unit	May-19	June-19	July-19
1	Supply Cost	_	<u> </u>		
2	Pipelines:				
3	Texas Gas Transmission ¹	\$	1,250,082	1,209,757	1,250,082
4	Tennessee Gas Pipeline ¹	\$	264,807	250,660	256,946
5	Trunkline Gas Company ¹	\$	6,873	6,654	6,875
6	Twin Eagle Resource Management	\$	0	0	0
7	Midwestern Pipeline ¹	\$	0	0	0
8	Total Pipeline Supply	\$	1,521,762	1,467,070	1,513,903
9	Total Other Suppliers	\$	3,764,467	3,749,126	3,338,090
10	Hedging Settlements	\$	0	0	0
11	Off System Storage				
12	Texas Gas Transmission	\$			
13	Tennessee Gas Pipeline	\$			
14	WKG Storage	\$	147,954	147,954	147,954
15	System Storage				
16	Withdrawals	\$	1,922	0	0
17	Injections	\$	(1,485,597)	(1,551,027)	(1,376,159)
18	Producers	\$	8,607	6,922	7,858
19	Third Party Reimbursements	\$	0	(2,265)	(2,826)
20	Pipeline Imbalances cashed out	\$			
21	System Imbalances ²	\$	(1,905,610)	(922,099)	(1,213,405)
22	Sub-Total	\$	2,053,504	2,895,682	2,415,415
23	Pipeline Refund + Interest				
24	Change in Unbilled	\$			
25	Company Use	\$			
26	Recovered thru Transportation	\$	<u></u>		
27	Total Recoverable Gas Cost	\$	2,053,503.74	2,895,681.61	2,415,414.96

¹ Includes demand charges, cost of settlement of historical imbalances and prepaid items.

² Includes Texas Gas No-Notice Service volumes and monthly imbalances related to transportation customer activities.

Recov For th	s Energy Corporati very from Correction te Three Months End 00000	Factors (CF)										Exhibit D Page 4 of 6	
2010			(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	
Line	•		()	ČF	ĊÉ	RÉ	RF	PBR	PBRRF	EGC	EGC Recovery	Total	
No.		Type of Sales	Mcf Sold	Rate	Amounts	Rate	Amounts	Rate	Amounts	Rate	Amounts	Recoveries	
1	May-19	G-1 Sales	680,384.274	\$0,5202	\$353,935.90	\$0.0000	\$0.00	\$0.2238	\$152,270.00	\$4.7292	\$3,217,673.31	\$3,723,879.21	
2		G-2 Sales	8,686.348	\$0.5202	4,518.64	\$0,0000	0.00	\$0.2238	1,944.00	\$4.2080	36,552.15	\$43,014,79	
6		Sub Total	689,070,622		\$358,454.54		\$0.00		\$154,214.00	-	\$3,254,225.46	\$3,766,894.00	
7		Timing: Cycle Billing and PPA's	0.000		(39,148.72)		0.00		33,247.75		565,669,85	\$559,768.88	
8		Total	689,070.622		\$319,305.82		\$0.00		\$187,461.75	-	\$3,819,895.31	\$4,326,662.88	\$4,139,201.13
9													
10													
11	June-19	G-1 Sales	406,963.285	\$0.5202	\$211,702.30	\$0.0000	\$0.00	\$0.2238	\$91,078.38	\$4,7292	\$1,924,610.77	\$2,227,391.45	
12		G-2 Sales	2,823.556	\$0.5202	1,468.81	\$0.0000	0.00	\$0,2238	631.91	\$4,2080	11,881.52	\$13,982.24	
16		Sub Total	409,786.841		\$213,171.11		\$0.00		\$91,710.29	-	\$1,936,492.29	\$2,241,373.69	
17		Timing: Cycle Billing and PPA's	0.000		(3,084.99)		0.00	_	21,649.24		387,589.16	\$406,153.41	
18		Total	409,786.841	_	\$210,086.12		\$0.00		\$113,359.53	-	\$2,324,081.45	\$2,647,527.10	\$2,534,167.57
19													
20													
21	July-19	G-1 Sales	203,972.448	\$0.5202	\$106,106.47	\$0.0000	\$0.00	\$0.2238	\$45,649.03	\$4,7292	\$964,626.50	\$1,116,382.00	
22		G-2 Sales	10,151.896	\$0.5202	5,281.02	\$0.0000	0.00	\$0,2238	2,271.99	\$4.2080	42,719.18	\$50,272.19	
26		Sub Total	214,124.344		\$111,387.49		\$0.00	-	\$47,921.02	-	\$1,007,345.68	\$1,166,654.19	
27		Timing: Cycle Billing and PPA's	0.000		62,732.24	_	0.00		53,309.13		1,064,668.47	\$1,180,709.84	
28		Total	214,124.344		\$174,119.73		\$0.00		\$101,230.15	-	\$2,072,014.15	\$2,347,364.03	\$2,246,133.88
29													
30													
31	Total Recovery fro	om Correction Factor (CF)		_	\$703,511.67	_							
32		unded through the Refund Factor (RF)		-		_	\$0.00						
33		m Performance Based Rate Recover				_		_	\$402,051.43				
34		from Expected Gas Cost (EGC) Facto								-	\$8,215,990.91		
35		rom Gas Cost Adjustment Factor (GC	:A)							=		\$9,321,554.01	
36													
37												_	\$8,919,502,58

NOTE: The cycle billing is a result of customers being billed by the meter read date.
The prior period adjustments (PPA's) consist of billing revisions/adjustments.

\$8,919,502.58

Traditional and Other Pipelines

		May	, 2019	June, 2019		July, 2019		
	Description	MCF	Cost	MCF	Cost	MCF	Cost	
1 2 3 4 5 6 7 8 9 10 11 2 13 14	Texas Gas Pipeline Area LG&E Natural Texaco Gas Marketing CMS WESCO Southern Energy Company Union Pacific Fuels Atmos Energy Marketing, LLC Engage ERI Prepaid Reservation Hedging Costs - All Zones							
15 16 17	Total	1,371,363	\$3,236,866.68	1,360,271	\$3,175,593.85	1,375,573	\$2,833,702.34	
19 20 21 22 23 24	Tennessee Gas Pipeline Area Chevron Natural Gas, Inc. Atmos Energy Marketing, LLC WESCO Prepaid Reservation Fuel Adjustment					<u> </u>		
27	Total	198,027	\$527,152.16	211,161	\$573,086.15	215,774	\$507,242.41	
30 31 32 33 34	Trunkline Gas Company Atmos Energy Marketing, LLC Engage Prepaid Reservation Fuel Adjustment							
35 36 37 38	Total	3	\$7.43	ָ (51)	(\$109.82)	19	\$44.21	
39 40 41 42 43 44 45	Midwestern Pipeline Atmos Energy Marketing, LLC Midwestern Gas Transmission Anadarko Prepaid Reservation Fuel Adjustment							
46 47 48 49	Total	232	\$585.80	276	\$663.82	(1,153)	(\$2,785.28)	
50 51 52 53 54 55 56	ANR Pipeline Atmos Energy Marketing, LLC LG&E Natural Anadarko Prepaid Reservation Fuel Adjustment							
57 58 59 60	Total	0	(\$145.34)	٥	(\$107.57)	0	(\$113.95)	
	All Zones Total	1,569,625	\$3,764,466.73	1,571,657	\$3,749,126.43	1,590,213	\$3,338,089.73	
64 65		**** Detail of Volume	s and Prices Has Been	Filed Under Peti	tion for Confidentiality	****		

Net Uncollectible Gas Cost Twelve Months Ended November, 2018

Line No.	Month (a)	Gas Cost Written Off (b)	Margin Written Off (c)	Taxes & Other Written Off (d)	Total Written Off (e)	Gas Cost Collected (f)	Margin Collected (g)	Net Uncollectible Gas Cost (h)	Uncollectible Gas Cost (i)
1	Dec-17	(\$64,503.06)	(\$134,412.80)	(\$6,727.81)	(\$205,643.67)	\$20,208.37	\$49,988.32	\$44,294.69	\$44,294.69
2	Jan-18	(\$12,606.47)	(\$45,893.68)	(\$2,458.34)	(\$60,958.49)	\$13,253.62	\$16,484.00	(\$647.15)	\$43,647.54
3	Feb-18	(\$27,020.56)	(\$115,508.78)	(\$3,891.32)	(\$146,420.66)	\$8,790.27	\$29,117.89	\$18,230.29	\$61,877.83
4	Mar-18	(\$3,624.19)	(\$43,715.38)	(\$1,368.78)	(\$48,708.35)	\$10,692.19	\$14,425.86	(\$7,068.00)	\$54,809.83
5	Apr-18	(\$22,726.45)	(\$75,593.33)	(\$3,818.44)	(\$102,138.22)	\$4,537.99	\$7,763.14	\$18,188.46	\$72,998.29
6	May-18	(\$28,298.73)	(\$60,014.35)	(\$3,105.88)	(\$91,418.96)	\$4,666.97	\$8,429.82	\$23,631.76	\$96,630.05
7	Jun-18	(\$36,465.23)	(\$46,406.98)	(\$2,836.59)	(\$85,708.80)	\$3,761.26	\$6,223.11	\$32,703.97	\$129,334.02
8	Jul-18	(\$74,077.63)	(\$74,207.98)	(\$6,453.29)	(\$154,738.90)	\$4,892.55	\$8,284.68	\$69,185.08	\$198,519.10
9	Aug-18	(\$105,026.16)	(\$115,968.02)	(\$8,340.59)	(\$229,334.77)	\$5,348.42	\$5,888.03	\$99,677.74	\$298,196.84
10	Sep-18	(\$131,229.06)	(\$143,720.03)	(\$9,996.26)	(\$284,945.35)	\$7,127.83	\$9,672.83	\$124,101.23	\$422,298.07
11	Oct-18	(\$198,847.02)	(\$216,930.61)	(\$14,086.79)	(\$429,864.42)	\$29,094.55	\$28,001.60	\$169,752.47	\$592,050.54
12	Nov-18	(\$117,596.02)	(\$156,629.03)	(\$9,551.56)	(\$283,776.61)	\$46,698.93	\$40,917.07	\$70,897.09	\$662,947.63

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Cumulative Net