

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ATMOS)	CASE NO.
ENERGY CORPORATION FOR A DEMAND-SIDE)	2021-00401
MANAGEMENT PROGRAM)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO ATMOS ENERGY CORPORATION

Atmos Energy Corporation (Atmos), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on February 9, 2022. The Commission directs Atmos to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

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

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, Atmos shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, paragraph 6. Atmos requested approval of its Demand-Side Management (DSM) Program to be effective May 1, 2021, or as determined by the Commission, but the Application was not filed until October 28, 2021.
 - a. Confirm that Atmos is requesting retroactive approval of the DSM tariff.
 - b. Refer to KRS 278.180, which requires a minimum of 20 days' notice to the Commission prior to the effective date of a tariff. Explain Atmos's position regarding the applicability of KRS 278.180 to Atmos's request.

2. Refer to the Application, paragraph 8. Explain whether Atmos has prepared a cost-benefit analysis for the DSM Program since the filing of this Application.

3. Refer to Atmos's Motion for Waiver (Motion) filed on October 28, 2021, contemporaneously with the Application, which does not identify the regulation for which Atmos is requesting a waiver. Identify the regulation for which Atmos is requesting a waiver and state with specificity the basis for Atmos's request.

4. Refer to the Motion, paragraph 4. Confirm that the \$37,000 spent on qualifying DSM projects between May 1, 2021, and September 30, 2021, was not paid for with funds received from the DSM rider.

5. Refer to the Motion, paragraph 6. Atmos requests to continue the program at a rate of \$0.0000/Ccf until April 30, 2023.

a. Explain why Atmos did not file a balancing calculation and a forecast of sales to determine the DSM rider rates.

b. Provide a rate which includes the estimated expenses for a DSM rider effective May 1, 2022, through April 30, 2023, and a balancing adjustment.

6. Refer to the Motion, Atmos Energy KY DSM Application Attachment 1 – 2021 DSM Balancing Adjustment. Also refer to the Application, paragraph 4.

a. Explain whether the over collection of funds of approximately \$5,900 that occurred between May 1, 2021, and September 30, 2021, is not included in the over collection as calculated in the Atmos Energy KY DSM Application Attachment 1–2021 DSM Balancing Adjustment for the residential class.

b. Explain whether the over collection of funds of approximately \$(4,000) that occurred between May 1, 2021, and September 30, 2021, is not included in

the over collection as calculated in the Atmos Energy KY DSM Application Attachment 1
–2021 DSM Balancing Adjustment for the commercial class.

7. Confirm that the DSM Program ceased October 15, 2021.



Linda C. Bridwell, PE
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DATED JAN 25 2022

cc: Parties of Record

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