

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ATMOS)	
ENERGY CORPORATION FOR AN)	CASE NO.
ADJUSTMENT OF RATES; APPROVAL OF)	2024-00276
TARIFF REVISIONS; AND OTHER GENERAL)	
RELIEF)	

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

Atmos Energy Corporation (Atmos), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on April 18, 2025. 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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, Volume 2, Proposed Tariff Sheets, Attachment 1, unnumbered page 39. Also, refer to the Direct Testimony of Paul H. Raab (Raab Direct Testimony), page 20, lines 16-17. Reconcile the differences in the proposed customer charges for Residential Sales Customers and Non-Residential Sales Customers.

2. Refer to the Application, the Direct Testimony of Brannon C. Taylor, Exhibit BCT-3.

a. Provide an update to the Exhibit with the most current information available. Also, include a row for Atmos's proposed residential rates while removing the Gas Cost Adjustment (GCA) per Mcf column.

b. Provide the updated Exhibit in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

3. Refer to the Application, Raab Direct Testimony, page 3, lines 8-10. Explain whether the Demand-Only or the Energy/Demand study or both utilized the "minimum system" approach.

4. Refer to the Application, the Raab Direct Testimony, page 3, lines 8-21. Also, refer to the Commission's May 19, 2022 final Order in Case No. 2021-00214, page 51,² regarding the Commission's rejection of Atmos' Customer/Demand study. Explain why Atmos decided to include a Customer/Demand study in its current rate case filing.

5. Refer to the Application, Raab Direct Testimony, page 3.

a. Explain if Atmos performed a zero-intercept study in preparation of its rate case filing.

b. If so, provide the zero-intercept study and explain why it was not included in the application.

c. If a zero-intercept study was not performed, explain why Atmos decided against performing that type of study.

6. Refer to the Application, Raab Direct Testimony, page 4, lines 5-13, regarding the Energy/Demand study. Also, refer to Case No. 2021-00214, Application,

² Case No. 2021-00214, *Electronic Application of Atmos Energy Corporation For An Adjustment Of Rates* (Ky. PSC May 19, 2022), Order at 51.

Direct Testimony of Paul H. Raab, page 4, lines 9-17, regarding the Demand/Commodity study.

a. Provide a detailed description of the differences and similarities between the Demand/Commodity study and the Energy/Demand study provided in the applications.

b. Explain why Atmos decided to perform an Energy/Demand study in this proceeding.

7. Refer to the Application, Raab Direct Testimony, Exhibit PHR-2, page 1. Explain the negative value for the State Income Taxes and Federal Income Taxes for the Residential Sales class.

8. Refer to the Application, Raab Direct Testimony, Exhibit PHR-5. Provide a similar exhibit comparing the Cost-of-Service Studies (COSS) filed in this case as compared to the COSS filed in Atmos's Application in Case No. 2021-00214.

9. Refer to the Application, Raab Direct Testimony, in general. Explain whether other methods of cost allocation were considered when performing the three different cost of services studies. If others were considered, explain why the method was not utilized in this application .

10. Provide, in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible, the average monthly bill impact for each customer class based on current and proposed base rates and not including any riders, roll-in of the pipeline replacement program charges, or the Gas Cost Adjustment.

11. Refer to the Application, Raab Direct Testimony, Exhibit PHR-2, Exhibit PHR-3, and Exhibit PHR-4.

a. Present evidence to prove that the current customer charges for each class are insufficient for Atmos based on the customer related cost results from each performed COSS at equalized return.

b. For each customer class, explain in detail why Atmos decided to allocate the proposed increase in revenue between the fixed customer charge and the volumetric charges.



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DATED APR 01 2025

cc: Parties of Record

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