

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ATMOS)	
ENERGY CORPORATION FOR APPROVAL OF)	CASE NO.
SPECIAL CONTRACT PURSUANT TO ITS)	2024-00340
ECONOMIC DEVELOPMENT RIDER)	

COMMISSION STAFF'S FIRST 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 December 13, 2024. 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 Application, page 4 (Finding 9) and Confidential Exhibit D.
 - a. State whether the \$10,820 included in Confidential Exhibit D is the sum of all amounts "[t]he Company has included some customer-specific fixed costs in Confidential Exhibit D for potential meter sets if necessary and for analysis purposes."
 - b. Provide an explanation of how the "Measurement/Regulation Station" line item was calculated.

c. State how the estimated Mcf usage was determined in Confidential Exhibit D.

2. Refer to Application, page 2 and the Large Volume Natural Gas Service Agreement, attached to the Application as Exhibit A, page 1. Confirm that Owens-Brockway Glass Container Inc. (OBCI) is a new customer that is constructing new facilities that are the subject of this special contract. If confirmed, describe the new facilities that are being constructed, the location of those facilities, and provide when the construction will be completed. If this cannot be confirmed, explain why not.

3. Refer to Atmos's Economic Development Rider (EDR) tariff, attached to the Application as Exhibit C. The EDR tariff states that:

[t]his Rider is available for load associated with initial permanent service to new establishments, expansion of existing establishments or new customers in existing establishments. This Rider may also be available for existing customers that are experiencing financial hardship if certain conditions can be met.

Identify the category that OBCI falls under to qualify it for the EDR discount and fully explain how OBCI's situation permits it to qualify for the EDR discount.

4. Refer to the Large Volume Natural Gas Service Agreement, attached to Application as Exhibit A.

a. Explain why it does not include a claw-back provision for recovery of EDR discounts in the event OBCI defaults prior to the expiration of the eight-year term.

b. State whether the Pipeline Replacement Program Rider rates will apply to OBCI. If not, explain why not.

5. Refer to Application, page 4, which states: “[t]he recitals of the Contract states that the Company does not anticipate any customer-specific fixed costs.” Explain why Atmos does not anticipate any customer-specific fixed costs.

6. Refer to the Application, Exhibit E.

a. Provide the minimum pressure on the line to be able to continue to serve that end of the line customers.

b. Provide the maximum additional load on this line that could be served with the current configuration and supply.



Linda C. Bridwell, PE
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Public Service Commission
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DATED NOV 27 2024

cc: Parties of Record

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