

**IN THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:** )  
 )  
**PETITION OF ATMOS ENERGY** )  
**CORPORATION TO REVISE** ) **TRA Docket No. 13-00111**  
**PERFORMANCE BASED** )  
**RATEMAKING MECHANISM RIDER** )  
**IN TARIFF** )

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**RESPONSE OF ATMOS ENERGY CORPORATION TO  
FIRST DISCOVERY REQUEST OF CONSUMER ADVOCATE**

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Atmos respectfully submits these responses to the First Discovery Request of the Consumer Advocate.

**GENERAL OBJECTIONS**

A. Out of an abundance of caution and in order to avoid any claim of waiver, Atmos respectfully incorporates these general objections in response to the Consumer Advocate's discovery requests. Atmos will work with the Consumer Advocate on any discovery disputes that may arise toward the end of avoiding the need for intervention by the hearing officer.

B. Atmos objects to the requests to the extent that it may be interpreted in a way that may call for information or documents protected from disclosure by the attorney-client privilege, common interest privilege, work product doctrine, or any other applicable privilege or protection.

C. By providing information in response to these requests, Atmos does not necessarily concede that such information is relevant, admissible, or discoverable, or that other information on the same or similar subjects would be discoverable. Atmos expressly reserves

the right to: (a) object to other discovery requests, despite their involving or relating to the subject matter of any of the requests responded to here; and (b) object to the introduction into evidence of any answer or produced document on relevancy or any other grounds.

D. The Atmos responses will be based on information then known to it. Atmos reserves the right to amend, modify or supplement its objections and responses.

E. Responses to these requests are and will be made without waiving or intending to waive the right to object to the use of any information provided in any subsequent proceeding or trial of this or any other action.

F. Atmos objects to requests that seek “all” documents pertaining to a certain issue or falling into a certain category. Such requests by their nature are unduly burdensome, and unreasonably cumulative and duplicative. When served on a corporate or other institutional defendant, literal compliance with such a request is impossible to assure. Requiring a party to produce “all” documents showing a certain fact when one document will do is, by its nature, unreasonably cumulative and duplicative. And such requests are often vague and indefinite. Where documents are produced in response to such a request, Atmos has interpreted the request in light of reason and the matters at issue in this case, and has made a reasonable search for responsive documents. In so doing, Atmos has complied with its discovery obligations.

**REQUEST NO. 1: Please provide a comparison of the annual cost savings to Atmos and its customers under the Performance-Based Ratemaking Mechanism (PBRM) tariff rider with and without resetting of the deadband under the Gas Procurement Incentive Mechanism (GPIM) for the annual PBR review periods from April 2002 through March 2013. Include the deadband; the benchmark commodity costs; Atmos actual commodity cost; the total commodity cost savings for Tennessee broken down between Atmos and its customers; the total commodity cost savings outside of the deadband broken down between Atmos and its customers; any capacity release savings; any AMA savings; and any savings forfeited by Atmos.**

**RESPONSE NO. 1:** Please see the attached Excel file named "*TRA DR 1 response - band reset comparison.xls*," which is made up of the following three worksheets:

- Summary comparison with and without reset,
- PBR savings with reset – audited, and
- PBR savings without reset.

**REQUEST NO. 2:** Please provide a comparison of the annual costs or savings to Atmos and its customers under the PBRM with and without the inclusion of the Natural Gas Intelligence (NGI) index under the GPIM for the annual PBR review periods from April 2002 through March 2013. Include the deadband; the benchmark commodity costs; Atmos actual commodity cost; the total commodity cost savings for Tennessee broken down between Atmos and its customers; the total commodity cost savings outside of the deadband broken down between Atmos and its customers; any capacity release savings; any AMA savings; and any savings forfeited by Atmos.

**RESPONSE NO. 2:** Please see the attached Excel file named "*TRA DR 2 response - NGI comparison.xls*," which is made up of the following three worksheets:

- Summary comparison with and without NGI Index in the Benchmark calculation,
- PBR savings with NGI Index in the Benchmark calculation – audited, and
- PBR savings without NGI Index in the Benchmark calculation.

**REQUEST NO. 3:** Please provide a spreadsheet containing the calculation of the market price benchmark used in the GPIM for April 2002 through March 2013. Include the monthly values of each index used to compute the benchmark and sufficient detail to show the method of calculating the benchmark from the individual indexes.

**RESPONSE NO. 3:** Please see the attached eleven CONFIDENTIAL Excel files named:

- "*02-03 ANNUAL Rpt and Results MR Audited Confidential.xls*,"
- "*03-04 ANNUAL Rpt and Results MR Audited Confidential.xls*,"
- "*04-05 ANNUAL Rpt and Results MR Audited Confidential.xls*,"
- "*05-06 ANNUAL Rpt and Results MR Audited Confidential.xls*,"
- "*06-07 ANNUAL Rpt and Results MR Audited Confidential.xls*,"
- "*07-08 ANNUAL Rpt and Results MR Audited Confidential.xls*,"
- "*08-09 ANNUAL Rpt and Results MR Audited Confidential.xls*,"
- "*09-10 ANNUAL Rpt and Results MR Audited Confidential.xls*,"

- *“10-11 ANNUAL Rpt and Results MR Audited Confidential.xls,”*
- *“11-12 ANNUAL Rpt and Results MR Audited Confidential.xls,”* and
- *“12-13 ANNUAL Rpt and Results MR Audited Confidential.xls.”*

Each file contains individual monthly tabs in which the benchmark calculation is provided along with the monthly values of each index used in the computation. In the instances where “day ahead” incremental purchases were made, daily indices are utilized in the benchmark calculation and these are provided as well. All eleven of these excel files contain the final worksheets presented to and accepted by TRA Staff in its annual review of Atmos' PBR program. These documents are being designated CONFIDENTIAL pursuant to the confidentiality order in this matter.

**REQUEST NO. 4: Please state, and explain in detail, all grounds and reasons that support your proposal to amend the GPIM section of the PBRM tariff rider by deleting the requirement that the deadband be reset at the end of each three-year period to 1% below the most recent annual audited results of the incentive plan.**

**RESPONSE NO. 4:** As the time for rebuttal testimony has yet to arrive under the Procedural Schedule in this matter, out of an abundance of caution, Atmos respectfully objects to this request as premature to the extent that additional matters may be addressed in rebuttal and reserves the right to do so. Subject to this objection, please refer to the Petition in this matter and to the Direct Testimony of Rebecca M. Buchanan on Behalf of Atmos Energy Corporation filed in this docket on August 13, 2013. Atmos would further refer to any rebuttal testimony that it may file in this matter.

**REQUEST NO. 5: Please provide all workpapers, calculations, and documents that support your responses to Request Nos. 1 through 4, above. The workpapers and calculations should be in Excel working format with numbers, formulas, and linked files provided.**

**RESPONSE NO. 5:** In addition to the thirteen Excel file attachments provided in response to Request Nos. 1 through 4, please find attached eight CONFIDENTIAL Excel files used as workpapers in support of the Company's response to Request No. 1, named as follows:

- *“05-06 ANNUAL Rpt - no reset, CONFIDENTIAL.xls,”*

- “06-07 ANNUAL Rpt - no reset, CONFIDENTIAL.xls,”
- “07-08 ANNUAL Rpt - no reset, CONFIDENTIAL.xls,”
- “08-09 ANNUAL Rpt - no reset, CONFIDENTIAL.xls,”
- “09-10 ANNUAL Rpt - no reset, CONFIDENTIAL.xls,”
- “10-11 ANNUAL Rpt - no reset, CONFIDENTIAL.xls,”
- “11-12 ANNUAL Rpt - no reset, CONFIDENTIAL.xls,” and
- “12-13 ANNUAL Rpt - no reset, CONFIDENTIAL.xls.”

Note that for Request No. 1, for the period April 2002 through March 2005, the historical record reflects that there were no deadband resets, thus the support for those years are the original audited PBR workpapers which are provided in the Company’s response to Request No. 3.

Additionally, please find eleven CONFIDENTIAL Excel files used as workpapers in support of the Company’s response to Request No. 2., named as follows:

- “02-03 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls,”
- “03-04 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls,”
- “04-05 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls,”
- “05-06 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls,”
- “06-07 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls,”
- “07-08 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls,”
- “08-09 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls,”
- “09-10 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls,”
- “10-11 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls,”
- “11-12 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls,” and
- “12-13 ANNUAL Rpt - No NGI, CONFIDENTIAL.xls.”

In regards to the proposal to remove the NGI Index in the benchmark calculation, the Petition and Direct Testimony of Rebecca M Buchanan on Behalf of Atmos Energy Corporation filed in this docket on August 13, 2013, provide the supportive reasoning. The eleven Excel files attached to the Company’s response to Request No. 3 provide the detail NGI, IFERC and NYMEX indices, and enable a side-by-side comparison.

Atmos further reserves the right to file rebuttal testimony in this matter and documents in support thereof in accordance with the Procedural Schedule.

**REQUEST NO. 6:** Please provide all workpapers, calculations, and documents that support the opinions, conclusions, proposals, and recommendations made in the Direct Testimony of Rebecca M. Buchanan on Behalf of Atmos Energy Corporation filed in this docket on August 13, 2013. The workpapers and calculations should be in Excel Working format with numbers, formulas, and linked files provided.

**RESPONSE NO. 6:** Please refer the Company's responses to Request Nos. 1 through 5 and Nos. 7 through 12 in this docket.

**REQUEST NO. 7:** Atmos proposes to change the "projected peak day requirement" in the Reserve Margin section of the tariff to be based upon "the coldest day on record since 1970" rather than "a five-year recurrence interval or the coldest day expected in a five-year period." If approved and implemented, could this change affect Atmos recovery of the cost of natural gas reserve from customer through the PGA? If such change could affect such recovery of cost from customers, please explain in detail how such change could affect such cost recovery.

**RESPONSE NO. 7:** Changing the tariff language would have no impact on Atmos' recovery of the cost of natural gas reserve from customers through the PGA. Atmos has, without objection, utilized the coldest day since 1970 for design day calculations and the annual demand allocations filings in Tennessee since 2007. The calculations and annual demand allocation filed after any proposed tariff change would utilize the same design HDD as recent filings.

**REQUEST NO. 8:** For the last three years beginning on July 1, 2010 and ending on June 30, 2013, please provide a comparison of the difference, if any, between (1) the cost natural gas reserve recoverable from customers when projected peak day requirement is based upon the coldest day on record since 1970, and (2) the cost of natural gas reserve recoverable from customers when projected peak day requirement is based upon a five-year recurrence interval or the coldest day expected in a five-year period.

**RESPONSE NO 8:** For all years listed, Atmos utilized the coldest day since 1970 in preparing the demand allocations for its Tennessee service area. Atmos is not changing any applied policies or methodologies. The Company's intent, rather, is simply to update the tariff so that it reflects current practices and operations. The existing tariff language stems from a prior era when Atmos owned an LNG peaking facility in Murfreesboro and propane air peaking plants across multiple distribution systems. Over the years Atmos has phased out these peaking facilities. In 2011, Atmos created two versions of the demand allocation filed each June so that a comparison could be made between the tariff language and the current Atmos design day HDD application:

1. Using the coldest day on record since 1970 for 2010-11 natural gas reserve margin was calculated showing a negative 3,836 MMBtu or -1.45%.
2. Using the coldest day expected in a five-year period adjusted for LNG withdrawals for 2010-11 the natural gas reserve margin was calculated showing a negative 12,446 MMBtu or -5.26%.

Atmos did not file the coldest day expected in a five-year period adjusted for LNG withdrawals (the second calculation) for demand allocations, and has not made any contracting decisions based upon the second calculation. Because the second calculation was not utilized for contracting decisions, Atmos did not repeat these alternate calculations for the 2011-2012 or 2012-2013 demand allocations, and instead focused on changing the outdated tariff language to reflect current practices and operations.

**REQUEST NO. 9: please state, and explain in detail, all grounds and reasons that support your proposal; to base the projected peak day requirement upon the coldest day on record since 1970.**

**RESPONSE NO. 9:** Selecting an appropriate HDD is the first step in the forecasting process to determine the appropriate level of assets to include within the Gas Supply Plan. Atmos believes that there is no reason that the weather in Tennessee in any future winter could not be at least as cold as one previously experienced in the service area. Across Atmos service areas, the standard design day temperature utilized for design day planning purposes is the coldest HDD since 1970. Atmos does not use weather data prior to 1970 due to lack of data availability and data integrity. Atmos believes that planning for a warmer design day temperature is inadequate and irresponsible, and Atmos has weather stations across the service territory where this policy has proven essential as recently as 2013.

One main reason Atmos employs the coldest day since 1970 to determine design day requirements is the risk of not holding adequate firm deliverability to meet demand on a peak day. If a utility does not hold adequate firm deliverability one of two scenarios can occur:

- Scenario One: If the pipeline supplying the LDC has excess capacity and supply available, the interstate pipeline will provide the LDC additional supply to meet demand above contracted levels. Under this first scenario, there is a premium cost (sometimes referred to as a penalty charge) associated with supply and capacity taken in excess of contracted levels.
- Scenario Two: If the pipeline does not have excess capacity and supply available, the pipeline will restrict the flow at the city gate meters to the contracted capacity level. If demand exceeds supply into the distribution system for more than a few minutes or hours, depending on the distribution system, operating pressures will drop, and



eventually portions of the system will not have sufficient pressure to serve firm customers. Natural gas appliances, water heaters and furnaces would stop working across large areas of the service territory.

An example of these consequences from extreme weather occurred region wide in February 2011, in the Atmos Colorado and West Texas areas as well as New Mexico Gas Company's New Mexico territories. The weather was the coldest experienced in New Mexico since 1971. The consequences of restricted capacity resulted in 32,000 New Mexico customers having natural gas service shut off. A state of emergency was declared with schools and government offices shut down and people evacuated to shelters. Out of state employees were brought in to help utility employees relight each customer individually. In total, customers experienced five days without gas service in an area experiencing the coldest weather in 40 years. These consequences are exactly what Atmos wants to prevent by using the coldest day since 1970 for calculating design day requirements. The process to restore service to natural gas customers is slowed by the requirement for Atmos employees to manually shut off gas meters and then relight all pilot lights for each affected customer.

The February 2011 cold front that affected Atmos' Colorado, Kansas, and Texas territories did not push across the rest of the US. In the event that the system had moved further, Tennessee could have experienced similar weather aberrations. Atmos performed analysis of all the Atmos weather stations currently utilized to compare a One-in-Five design day HDD coldest day to actual weather experienced at those weather stations. The One-in-Five Design HDD is calculated by taking the average of the coldest HDDs in successive five year periods using weather data from 1970 through the most recent winter. In the past five years, 23% of the weather stations Atmos used experienced weather colder than the One-in-Five (8 of 35). However, one weather

station surpassed the coldest day since 1970 during those same five years. To further illustrate, please see the table below showing the 21 instances of Actual HDDs surpassing the One-in-Five Design HDD in three of Atmos' eight states.

Weather Station	Location	Date	Actual HDD	One-in-Five Design HDD	One-in-Five to Actual HDD Variance	1970 to present Design Day	Coldest Day to Actual HDD Variance
AMA	Amarillo, TX	2/1/2011	63	62.06	0.94	66.5	
CAG	Craig, CO	2/1/2011	85	82.81	2.19	92.5	
CAG	Craig, CO	2/2/2011	91	82.81	8.19	92.5	
CAG	Craig, CO	1/14/2013	87	82.81	4.19	92.5	
DRO	Durango, CO	12/27/2008	65	63	2	69.5	
DRO	Durango, CO	12/9/2009	64	63	1	69.5	
DRO	Durango, CO	12/31/2010	67	63	4	69.5	
DRO	Durango, CO	1/1/2011	74	63	11	69.5	4.50
DRO	Durango, CO	2/2/2011	66	63	3	74	
DRO	Durango, CO	1/12/2013	66	63	3	74	
DRO	Durango, CO	1/14/2013	65	63	2	74	
DRO	Durango, CO	1/15/2013	65	63	2	74	

	CO						
GXY	Greely, CO	12/14/2008	73	71.94	1.06	78.5	
GXY	Greely, CO	12/9/2009	72	71.94	0.06	78.5	
GXY	Greely, CO	2/1/2011	72	71.94	0.06	78.5	
LAA	Lamar, KS	2/2/2011	71	70.56	0.44	75.5	
LBB	Lubbock, TX	2/1/2011	57	56.13	0.88	61	
LBB	Lubbock, TX	2/2/2011	57	56.13	0.88	61	
MAF	Midland, TX	2/1/2011	52	51.88	0.13	63	
MAF	Midland, TX	2/2/2011	54	51.88	2.13	63	
PUB	Pueblo, CO	2/2/2011	73	71.25	1.75	76.5	

Several of Atmos' weather stations experienced as much as 10 HDDs colder than the One-in-Five Design HDD. Using the One-in-Five Design HDD in that situation could end up in disastrous circumstances for capacity planning. Fortunately, Atmos does not use the One-in-Five for capacity planning purposes in any of its service areas and sufficient capacity was available to meet the peak days. Atmos acknowledges that the design day weather policy is conservative, but believes it is imperative that firm customers have supply when they need it the most.

**REQUEST NO. 10: Please provide all workpapers, calculations, and documents that support your responses to Request Nos. 7 through 9 above. The workpapers and calculations should be in Excel working format with numbers, formulas, and linked files provided.**

**RESPONSE NO 10:**

Please see the following files:

- TN Exhibit 1 - Daily Data - One in Five Calculation.xlsx
- TN Exhibit 2 - TN VA Forecast and Reserve Margin effective June 1, 2013.xls

Atmos will produce any additional workpapers supporting rebuttal testimony after rebuttal testimony has been submitted in accordance with the Procedural Schedule.

**REQUEST NO. 11:** Please identify each person whom Atmos expects to call as an expert witness at the hearing on the merits of this matter, and for each such person state the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, and the grounds for each opinion. Please provide a curriculum vitae for each such expert.

**RESPONSE NO. 11:** As the time to submit rebuttal testimony has not yet arrived under the Procedural Schedule, Atmos must respectfully reserve the right to call rebuttal witnesses, including those who may offer what may be regarded as expert testimony. At this time, Atmos has identified one witness, for whom it has submitted pre-filed direct testimony as required. That witness is Rebecca Buchanan, and her pre-filed direct testimony is incorporated by reference in further response.

**REQUEST NO. 12:** Please provide all workpapers, calculations, and documents that support the opinions, conclusions, proposals, and recommendations made by each person that Atmos expects to call as an expert witness at the hearing on the merits of this matter. The workpapers and calculations should be in Excel working format with numbers, formulas, and linked files provide.

**RESPONSE NO 12:** Please see attachments provided by Atmos in Responses 1-10.

**REQUEST NO. 13:** Please produce copies of all hearing exhibits that you plan to introduce, use, or reference at the hearing on the merits of this matter.

**RESPONSE NO 13:** Please see attachments provided by Atmos in Responses 1-10. In addition, Atmos must respectfully reserve the right to submit rebuttal testimony and supporting

exhibits in accordance with the Procedural Schedule in this matter, which are incorporated by reference in further response to this request.

Respectfully submitted,

**NEAL & HARWELL, PLC**

By: 

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served, via the method(s) indicated below, on the following counsel of record, this the 28 day of October, 2013.

- ☐ Hand
- ☐ Mail
- ☐ Fax
- ☐ Fed. Ex.
- ☒ E-Mail

Joe Shirley, Esq.  
Office of Attorney General  
Consumer Advocate and Protection Division  
425 Fifth Avenue, North, 3<sup>rd</sup> Floor  
P. O. Box 20207  
Nashville, TN 37202-4015

A handwritten signature in dark ink, appearing to read "Joe Shirley", is written over a horizontal line.

Atmos Energy Corporation  
Tennessee PBR Summary of Total Annual PBR Savings with and without deadband reset  
PBR Review Period Apr 1 - Mar 31,

Year	Total Annual Gas Cost Savings with reset			Total Annual Gas Cost Savings w/out reset			Difference in Annual Gas Cost Savings		
	Total Savings	"Historic" Customer	Atmos	Total TN	"Proposed" Customer	Atmos	Proposed vs Historic Total TN	Customer	Atmos
02/03	\$ 2,423,884	\$ 2,178,086	\$ 245,799	\$ 2,423,884	\$ 2,178,086	\$ 245,799	\$ -	\$ -	\$ -
03/04	\$ 1,497,795	\$ 1,482,733	\$ 15,062	\$ 1,497,795	\$ 1,482,733	\$ 15,062	\$ -	\$ -	\$ -
04/05	\$ 748,557	\$ 706,470	\$ 42,087	\$ 748,557	\$ 706,470	\$ 42,087	\$ -	\$ -	\$ -
05/06	\$ 710,159	\$ 672,457	\$ 37,702	\$ 710,159	\$ 672,457	\$ 37,702	\$ -	\$ -	\$ -
06/07	\$ 1,294,696	\$ 1,261,906	\$ 32,790	\$ 1,294,696	\$ 1,261,906	\$ 32,790	\$ -	\$ -	\$ -
07/08	\$ 1,183,630	\$ 1,150,891	\$ 32,739	\$ 1,183,630	\$ 1,150,891	\$ 32,739	\$ -	\$ -	\$ -
08/09	\$ 2,134,009	\$ 2,039,651	\$ 94,358	\$ 2,134,009	\$ 2,053,909	\$ 80,100	\$ -	\$ 14,258	\$ (14,258)
09/10	\$ 1,940,316	\$ 1,648,606	\$ 291,710	\$ 1,940,316	\$ 1,704,709	\$ 235,607	\$ -	\$ 56,103	\$ (56,103)
10/11	\$ 1,913,152	\$ 1,621,014	\$ 292,138	\$ 1,913,152	\$ 1,687,534	\$ 225,618	\$ -	\$ 66,520	\$ (66,520)
11/12	\$ 6,080,495	\$ 4,830,495	\$ 1,250,000	\$ 6,080,495	\$ 4,830,495	\$ 1,250,000	\$ -	\$ -	\$ -
12/13	\$ 5,668,463	\$ 4,418,463	\$ 1,250,000	\$ 5,668,463	\$ 4,418,463	\$ 1,250,000	\$ -	\$ -	\$ -
	<b>\$ 25,595,155</b>	<b>\$ 22,010,771</b>	<b>\$ 3,584,384</b>	<b>\$ 25,595,155</b>	<b>\$ 22,147,652</b>	<b>\$ 3,447,503</b>	<b>\$ -</b>	<b>\$ 136,881</b>	<b>\$ (136,881)</b>

Note: Total Annual Gas Cost Savings includes Commodity Cost Savings within & outside the deadband, Capacity Release savings, & AMA savings. These are detailed on pages 2 and 3 of 3.

Staff audited <b>B.</b>	Year	Deadband		actual Atmos %	GPIM	Atmos TN	Total TN Commodity Cost Savings			Outside the deadband			Capacity Release Savings			AMA Upfront Shared Savings			Total Shared Savings			Atmos forfeited savings	Staff audited <b>B.</b>
		low band	high band		Commodity Benchmark	Commodity Invoice Cost	Total Savings	Customer	Atmos	GPIM Shared Commodity Cost Savings (A)	Customer	Atmos	Total TN	Customer	Atmos	Total TN	Customer	Atmos	Total TN	Customer	Atmos		
X	02/03	97.7%	102.0%	97.4%	\$ 85,258,768	\$ 83,050,401	\$ 2,208,367	\$ 1,984,120	\$ 224,247	\$ 448,493	\$ 224,247	\$ 224,247	\$ 215,517	\$ 193,966	\$ 21,552				\$ 664,010	\$ 418,213	\$ 245,799	-	X
X	03/04	97.7%	102.0%	98.5%	\$ 89,963,666	\$ 88,616,491	\$ 1,347,175	\$ 1,347,175	\$ -	\$ -	\$ -	\$ -	\$ 150,620	\$ 135,558	\$ 15,062				\$ 150,620	\$ 135,558	\$ 15,062	-	X
X	04/05	97.7%	102.0%	99.7%	\$ 100,960,125	\$ 100,632,440	\$ 327,685	\$ 327,685	\$ -	\$ -	\$ -	\$ -	\$ 68,919	\$ 62,027	\$ 6,892	\$ 351,953	\$ 316,758	\$ 35,195	\$ 420,872	\$ 378,785	\$ 42,087	-	X
X	05/06	97.5%	102.0%	99.8%	\$ 144,132,171	\$ 143,799,033	\$ 333,138	\$ 333,138	\$ -	\$ -	\$ -	\$ -	\$ 25,083	\$ 22,575	\$ 2,508	\$ 351,938	\$ 316,744	\$ 35,194	\$ 377,021	\$ 339,319	\$ 37,702	-	X
X	06/07	97.5%	102.0%	99.1%	\$ 102,155,670	\$ 101,188,871	\$ 966,799	\$ 966,799	\$ -	\$ -	\$ -	\$ -	\$ 2,983	\$ 2,684	\$ 298	\$ 324,914	\$ 292,423	\$ 32,491	\$ 327,897	\$ 295,107	\$ 32,790	-	X
X	07/08	97.5%	102.0%	99.2%	\$ 105,043,802	\$ 104,187,557	\$ 856,245	\$ 856,245	\$ -	\$ -	\$ -	\$ -	\$ 2,957	\$ 2,661	\$ 296	\$ 324,428	\$ 291,985	\$ 32,443	\$ 327,385	\$ 294,646	\$ 32,739	-	X
X	08/09	98.1%	102.0%	98.9%	\$ 124,108,009	\$ 122,775,000	\$ 1,333,009	\$ 1,318,751	\$ 14,258	\$ 28,516	\$ 14,258	\$ 14,258	\$ -	\$ -	\$ -	\$ 801,000	\$ 720,900	\$ 80,100	\$ 829,516	\$ 735,158	\$ 94,358	-	X
X	09/10	98.1%	102.0%	98.4%	\$ 71,166,623	\$ 70,027,307	\$ 1,139,316	\$ 927,706	\$ 211,610	\$ 423,220	\$ 211,610	\$ 211,610	\$ -	\$ -	\$ -	\$ 801,000	\$ 720,900	\$ 80,100	\$ 1,224,220	\$ 932,510	\$ 291,710	-	X
X	10/11	98.1%	102.0%	98.2%	\$ 62,393,640	\$ 61,287,238	\$ 1,106,402	\$ 894,939	\$ 211,463	\$ 422,926	\$ 211,463	\$ 211,463	\$ -	\$ -	\$ -	\$ 806,750	\$ 726,075	\$ 80,675	\$ 1,229,676	\$ 937,538	\$ 292,138	-	X
X	11/12	97.4%	102.0%	91.1%	\$ 51,503,033	\$ 46,909,938	\$ 4,593,095	\$ 3,491,835	\$ 1,101,260	\$ 3,254,110	\$ 1,627,055	\$ 1,627,055	\$ -	\$ -	\$ -	\$ 1,487,400	\$ 1,338,660	\$ 148,740	\$ 4,741,510	\$ 3,491,510	\$ 1,250,000	525,795	X
X	12/13	97.4%	102.0%	90.9%	\$ 45,638,865	\$ 41,495,769	\$ 4,143,096	\$ 3,045,633	\$ 1,097,463	\$ 2,956,412	\$ 1,478,206	\$ 1,478,206	\$ -	\$ -	\$ -	\$ 1,525,367	\$ 1,372,830	\$ 152,537	\$ 4,481,779	\$ 3,231,779	\$ 1,250,000	380,743	X
					\$ 982,324,372	\$ 963,970,045	\$ 18,354,327	\$ 15,494,026	\$ 2,860,301	\$ 7,533,677	\$ 3,766,839	\$ 3,766,839	\$ 466,079	\$ 419,471	\$ 46,608	\$ 6,774,749	\$ 6,097,274	\$ 677,475	\$ 14,774,505	\$ 11,190,122	\$ 3,584,384		
					100%			84%	16%	50%													

**Notes:**    **A.)** The calculation of GPIM Shared Commodity Savings does NOT reflect the annual cap of \$1,250,000 that is imposed on Atmos.   Atmos' GPIM Shared Commodity Savings are actually reduced because of the cap in 11/12 and 12/13.  
              **B.)** The amounts reflected on this worksheet have been accepted by TRA Staff in its annual review of Atmos' PBR program.

**key:**       The yellow highlighted cells indicate Atmos' actual results, that is, invoiced gas costs as a percent of benchmarked gas costs, and were used to reset the low band for the subsequent 3 year PBR review period (actual less 1%).



Atmos Energy Corporation  
Tennessee PBR Summary of Annual Results without deadband reset (low band held at 97.7% of benchmark)  
PBR Review Period Apr 1 - Mar 31,

Year	Deadband		actual Atmos %	GPIM	Atmos TN	Total TN Commodity Cost Savings			Outside the deadband			Capacity Release Savings			AMA Upfront Shared Savings			Total Shared Savings			Atmos forfeited savings
	low band	high band		Commodity	Commodity	Total Savings	Customer	Atmos	GPIM Shared Commodity Cost Savings (A)			Total TN	Customer	Atmos	Total TN	Customer	Atmos	Total TN	Customer	Atmos	
				Benchmark	Invoice Cost				Total TN	Customer	Atmos										
02/03	97.7%	102.0%	97.4%	\$ 85,258,768	\$ 83,050,401	\$ 2,208,367	\$ 1,984,120	\$ 224,247	\$ 448,493	\$ 224,247	\$ 224,247	\$ 215,517	\$ 193,966	\$ 21,552				\$ 664,010	\$ 418,213	\$ 245,799	-
03/04	97.7%	102.0%	98.5%	\$ 89,963,666	\$ 88,616,491	\$ 1,347,175	\$ 1,347,175	\$ -	\$ -	\$ -	\$ -	\$ 150,620	\$ 135,558	\$ 15,062				\$ 150,620	\$ 135,558	\$ 15,062	-
04/05	97.7%	102.0%	99.7%	\$ 100,960,125	\$ 100,632,440	\$ 327,685	\$ 327,685	\$ -	\$ -	\$ -	\$ -	\$ 68,919	\$ 62,027	\$ 6,892	\$ 351,953	\$ 316,758	\$ 35,195	\$ 420,872	\$ 378,785	\$ 42,087	-
05/06	97.7%	102.0%	99.8%	\$ 144,132,171	\$ 143,799,033	\$ 333,138	\$ 333,138	\$ -	\$ -	\$ -	\$ -	\$ 25,083	\$ 22,575	\$ 2,508	\$ 351,938	\$ 316,744	\$ 35,194	\$ 377,021	\$ 339,319	\$ 37,702	-
06/07	97.7%	102.0%	99.1%	\$ 102,155,670	\$ 101,188,871	\$ 966,799	\$ 966,799	\$ -	\$ -	\$ -	\$ -	\$ 2,983	\$ 2,684	\$ 298	\$ 324,914	\$ 292,423	\$ 32,491	\$ 327,897	\$ 295,107	\$ 32,790	-
07/08	97.7%	102.0%	99.2%	\$ 105,043,802	\$ 104,187,557	\$ 856,245	\$ 856,245	\$ -	\$ -	\$ -	\$ -	\$ 2,957	\$ 2,661	\$ 296	\$ 324,428	\$ 291,985	\$ 32,443	\$ 327,385	\$ 294,646	\$ 32,739	-
08/09	97.7%	102.0%	98.9%	\$ 124,108,009	\$ 122,775,000	\$ 1,333,009	\$ 1,333,009	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 801,000	\$ 720,900	\$ 80,100	\$ 801,000	\$ 720,900	\$ 80,100	-
09/10	97.7%	102.0%	98.4%	\$ 71,166,623	\$ 70,027,307	\$ 1,139,316	\$ 983,809	\$ 155,507	\$ 311,014	\$ 155,507	\$ 155,507	\$ -	\$ -	\$ -	\$ 801,000	\$ 720,900	\$ 80,100	\$ 1,112,014	\$ 876,407	\$ 235,607	-
10/11	97.7%	102.0%	98.2%	\$ 62,393,640	\$ 61,287,238	\$ 1,106,402	\$ 961,459	\$ 144,943	\$ 289,886	\$ 144,943	\$ 144,943	\$ -	\$ -	\$ -	\$ 806,750	\$ 726,075	\$ 80,675	\$ 1,096,636	\$ 871,018	\$ 225,618	-
11/12	97.7%	102.0%	91.1%	\$ 51,503,033	\$ 46,909,938	\$ 4,593,095	\$ 3,491,835	\$ 1,101,260	\$ 3,408,504	\$ 1,704,252	\$ 1,704,252	\$ -	\$ -	\$ -	\$ 1,487,400	\$ 1,338,660	\$ 148,740	\$ 4,895,904	\$ 3,645,904	\$ 1,250,000	602,992
12/13	97.7%	102.0%	90.9%	\$ 45,638,865	\$ 41,495,769	\$ 4,143,096	\$ 3,045,633	\$ 1,097,463	\$ 3,093,468	\$ 1,546,734	\$ 1,546,734	\$ -	\$ -	\$ -	\$ 1,525,367	\$ 1,372,830	\$ 152,537	\$ 4,618,835	\$ 3,368,835	\$ 1,250,000	449,271
				\$ 982,324,372	\$ 963,970,045	\$ 18,354,327	\$ 15,630,907	\$ 2,723,420	\$ 7,551,365	\$ 3,775,683	\$ 3,775,683	\$ 466,079	\$ 419,471	\$ 46,608	\$ 6,774,749	\$ 6,097,274	\$ 677,475	\$ 14,792,193	\$ 11,344,691	\$ 3,447,503	
						100%	85%	15%			50%			50%							

**Notes:** A.) The calculation of GPIM Shared Commodity Savings does NOT reflect the annual cap of \$1,250,000 that is imposed on Atmos. Atmos' GPIM Shared Commodity Savings are actually reduced because of the cap in 11/12 and 12/13.  
**key:** The orange highlighted cells represents amounts that changed from the "as filed, Staff audited" amounts, with deadband reset.

Atmos Energy Corporation

Tennessee PBR Summary of Total Annual PBR Savings with and without NGI Index in the Benchmark calculation.

PBR Review Period Apr 1 - Mar 31,

Year	Total Annual Gas Cost Savings with reset			Total Annual Gas Cost Savings w/out reset			Difference in Annual Gas Cost Savings		
	Total Savings	"Historic" Customer	Atmos	Total TN	"Proposed" Customer	Atmos	Total TN	Customer	Atmos
02/03	\$ 2,423,884	\$ 2,178,086	\$ 245,799	\$ 2,591,441	\$ 2,295,633	\$ 295,809	\$ 167,557	\$ 117,547	\$ 50,010
03/04	\$ 1,497,795	\$ 1,482,733	\$ 15,062	\$ 1,685,947	\$ 1,670,885	\$ 15,062	\$ 188,152	\$ 188,152	\$ -
04/05	\$ 748,557	\$ 706,470	\$ 42,087	\$ 1,065,876	\$ 1,023,789	\$ 42,087	\$ 317,319	\$ 317,319	\$ -
05/06	\$ 710,159	\$ 672,457	\$ 37,702	\$ 1,850,415	\$ 1,812,713	\$ 37,702	\$ 1,140,256	\$ 1,140,256	\$ -
06/07	\$ 1,294,696	\$ 1,261,906	\$ 32,790	\$ 1,737,266	\$ 1,704,476	\$ 32,790	\$ 442,570	\$ 442,570	\$ -
07/08	\$ 1,183,630	\$ 1,150,891	\$ 32,739	\$ 1,476,536	\$ 1,443,797	\$ 32,739	\$ 292,906	\$ 292,906	\$ -
08/09	\$ 2,134,009	\$ 2,039,651	\$ 94,358	\$ 2,472,451	\$ 2,372,005	\$ 100,446	\$ 338,442	\$ 332,354	\$ 6,088
09/10	\$ 1,940,316	\$ 1,648,606	\$ 291,710	\$ 2,053,899	\$ 1,789,046	\$ 264,853	\$ 113,583	\$ 140,440	\$ (26,857)
10/11	\$ 1,913,152	\$ 1,621,014	\$ 292,138	\$ 2,025,002	\$ 1,784,118	\$ 240,884	\$ 111,850	\$ 163,104	\$ (51,254)
11/12	\$ 6,080,495	\$ 4,830,495	\$ 1,250,000	\$ 6,167,022	\$ 4,917,022	\$ 1,250,000	\$ 86,527	\$ 86,527	\$ -
12/13	\$ 5,668,463	\$ 4,418,463	\$ 1,250,000	\$ 5,750,816	\$ 4,500,816	\$ 1,250,000	\$ 82,353	\$ 82,353	\$ -
	<b>\$ 25,595,155</b>	<b>\$ 22,010,771</b>	<b>\$ 3,584,384</b>	<b>\$ 28,876,670</b>	<b>\$ 25,314,299</b>	<b>\$ 3,562,371</b>	<b>\$ 3,281,515</b>	<b>\$ 3,303,528</b>	<b>\$ (22,013)</b>

Note: Total Annual Gas Cost Savings includes Commodity Cost Savings within & outside the deadband, Capacity Release savings, & AMA savings. These are detailed on pages 2 and 3 of 3.

Atmos Energy Corporation  
Tennessee PBR Summary of Annual Results as filed with NGI Index in the Benchmark calculation.  
PBR Review Period Apr 1 - Mar 31,

Staff audited <b>B.</b>	Year	Deadband		actual Atmos %	GPIM	Atmos TN	Total TN Commodity Cost Savings			Outside the deadband			Capacity Release Savings			AMA Upfront Shared Savings			Total Shared Savings			Atmos forfeited savings	Staff audited <b>B.</b>
		low band	high band		Commodity Benchmark	Commodity Invoice Cost	Total Savings	Customer	Atmos	GPIM Shared Commodity Cost Savings (A)	Customer	Atmos	Total TN	Customer	Atmos	Total TN	Customer	Atmos	Total TN	Customer	Atmos		
X	02/03	97.7%	102.0%	97.4%	\$ 85,258,768	\$ 83,050,401	\$ 2,208,367	\$ 1,984,120	\$ 224,247	\$ 448,493	\$ 224,247	\$ 224,247	\$ 215,517	\$ 193,966	\$ 21,552				\$ 664,010	\$ 418,213	\$ 245,799	-	X
X	03/04	97.7%	102.0%	98.5%	\$ 89,963,666	\$ 88,616,491	\$ 1,347,175	\$ 1,347,175	\$ -	\$ -	\$ -	\$ -	\$ 150,620	\$ 135,558	\$ 15,062				\$ 150,620	\$ 135,558	\$ 15,062	-	X
X	04/05	97.7%	102.0%	99.7%	\$ 100,960,125	\$ 100,632,440	\$ 327,685	\$ 327,685	\$ -	\$ -	\$ -	\$ -	\$ 68,919	\$ 62,027	\$ 6,892	\$ 351,953	\$ 316,758	\$ 35,195	\$ 420,872	\$ 378,785	\$ 42,087	-	X
X	05/06	97.5%	102.0%	99.8%	\$ 144,132,171	\$ 143,799,033	\$ 333,138	\$ 333,138	\$ -	\$ -	\$ -	\$ -	\$ 25,083	\$ 22,575	\$ 2,508	\$ 351,938	\$ 316,744	\$ 35,194	\$ 377,021	\$ 339,319	\$ 37,702	-	X
X	06/07	97.5%	102.0%	99.1%	\$ 102,155,670	\$ 101,188,871	\$ 966,799	\$ 966,799	\$ -	\$ -	\$ -	\$ -	\$ 2,983	\$ 2,684	\$ 298	\$ 324,914	\$ 292,423	\$ 32,491	\$ 327,897	\$ 295,107	\$ 32,790	-	X
X	07/08	97.5%	102.0%	99.2%	\$ 105,043,802	\$ 104,187,557	\$ 856,245	\$ 856,245	\$ -	\$ -	\$ -	\$ -	\$ 2,957	\$ 2,661	\$ 296	\$ 324,428	\$ 291,985	\$ 32,443	\$ 327,385	\$ 294,646	\$ 32,739	-	X
X	08/09	98.1%	102.0%	98.9%	\$ 124,108,009	\$ 122,775,000	\$ 1,333,009	\$ 1,318,751	\$ 14,258	\$ 28,516	\$ 14,258	\$ 14,258	\$ -	\$ -	\$ -	\$ 801,000	\$ 720,900	\$ 80,100	\$ 829,516	\$ 735,158	\$ 94,358	-	X
X	09/10	98.1%	102.0%	98.4%	\$ 71,166,623	\$ 70,027,307	\$ 1,139,316	\$ 927,706	\$ 211,610	\$ 423,220	\$ 211,610	\$ 211,610	\$ -	\$ -	\$ -	\$ 801,000	\$ 720,900	\$ 80,100	\$ 1,224,220	\$ 932,510	\$ 291,710	-	X
X	10/11	98.1%	102.0%	98.2%	\$ 62,393,640	\$ 61,287,238	\$ 1,106,402	\$ 894,939	\$ 211,463	\$ 422,926	\$ 211,463	\$ 211,463	\$ -	\$ -	\$ -	\$ 806,750	\$ 726,075	\$ 80,675	\$ 1,229,676	\$ 937,538	\$ 292,138	-	X
X	11/12	97.4%	102.0%	91.1%	\$ 51,503,033	\$ 46,909,938	\$ 4,593,095	\$ 3,491,835	\$ 1,101,260	\$ 3,254,110	\$ 1,627,055	\$ 1,627,055	\$ -	\$ -	\$ -	\$ 1,487,400	\$ 1,338,660	\$ 148,740	\$ 4,741,510	\$ 3,491,510	\$ 1,250,000	525,795	X
X	12/13	97.4%	102.0%	90.9%	\$ 45,638,865	\$ 41,495,769	\$ 4,143,096	\$ 3,045,633	\$ 1,097,463	\$ 2,956,412	\$ 1,478,206	\$ 1,478,206	\$ -	\$ -	\$ -	\$ 1,525,367	\$ 1,372,830	\$ 152,537	\$ 4,481,779	\$ 3,231,779	\$ 1,250,000	380,743	X
					\$ 982,324,372	\$ 963,970,045	\$ 18,354,327	\$ 15,494,026	\$ 2,860,301	\$ 7,533,677	\$ 3,766,839	\$ 3,766,839	\$ 466,079	\$ 419,471	\$ 46,608	\$ 6,774,749	\$ 6,097,274	\$ 677,475	\$ 14,774,505	\$ 11,190,122	\$ 3,584,384		
					100%			84%	16%	50%													

Notes: A.) The calculation of GPIM Shared Commodity Savings does NOT reflect the annual cap of \$1,250,000 that is imposed on Atmos. Atmos' GPIM Shared Commodity Savings are actually reduced because of the cap in 11/12 and 12/13.  
B.) The amounts reflected on this worksheet have been accepted by TRA Staff in its annual review of Atmos' PBR program.

key: The yellow highlighted cells indicate Atmos' actual results, that is, invoiced gas costs as a percent of benchmarked gas costs, and were used to reset the low band for the subsequent 3 year PBR review period (actual less 1%).

Atmos Energy Corporation  
Tennessee PBR Summary of Annual Results without NGI Index in the Benchmark calculation.  
PBR Review Period Apr 1 - Mar 31,

Year	Deadband		original Atmos %	w/o NGI Atmos %	GPIM Commodity Benchmark	Atmos TN Commodity Invoice Cost	Total TN Commodity Cost Savings			Outside the deadband GPIM Shared Commodity Cost Savings (A)			Capacity Release Savings			AMA Upfront Shared Savings			Total Shared Savings			Atmos forfeited savings
	low band	high band					Total Savings	Customer	Atmos	Total TN	Customer	Atmos	Total TN	Customer	Atmos	Total TN	Customer	Atmos	Total TN	Customer	Atmos	
02/03	97.7%	102.0%	97.4%	97.2%	\$ 85,426,325	\$ 83,050,401	\$ 2,375,924	\$ 2,101,667	\$ 274,257	\$ 548,513	\$ 274,257	\$ 274,257	\$ 215,517	\$ 193,966	\$ 21,552				\$ 764,030	\$ 468,223	\$ 295,809	-
03/04	97.7%	102.0%	98.5%	98.3%	\$ 90,151,818	\$ 88,616,491	\$ 1,535,327	\$ 1,535,327	\$ -	\$ -	\$ -	\$ -	\$ 150,620	\$ 135,558	\$ 15,062				\$ 150,620	\$ 135,558	\$ 15,062	-
04/05	97.7%	102.0%	99.7%	99.4%	\$ 101,277,444	\$ 100,632,440	\$ 645,004	\$ 645,004	\$ -	\$ -	\$ -	\$ -	\$ 68,919	\$ 62,027	\$ 6,892	\$ 351,953	\$ 316,758	\$ 35,195	\$ 420,872	\$ 378,785	\$ 42,087	-
05/06	97.3%	102.0%	99.8%	99.0%	\$ 145,272,427	\$ 143,799,033	\$ 1,473,394	\$ 1,473,394	\$ -	\$ -	\$ -	\$ -	\$ 25,083	\$ 22,575	\$ 2,508	\$ 351,938	\$ 316,744	\$ 35,194	\$ 377,021	\$ 339,319	\$ 37,702	-
06/07	97.3%	102.0%	99.1%	98.6%	\$ 102,598,240	\$ 101,188,871	\$ 1,409,369	\$ 1,409,369	\$ -	\$ -	\$ -	\$ -	\$ 2,983	\$ 2,684	\$ 298	\$ 324,914	\$ 292,423	\$ 32,491	\$ 327,897	\$ 295,107	\$ 32,790	-
07/08	97.3%	102.0%	99.2%	98.9%	\$ 105,336,708	\$ 104,187,557	\$ 1,149,151	\$ 1,149,151	\$ -	\$ -	\$ -	\$ -	\$ 2,957	\$ 2,661	\$ 296	\$ 324,428	\$ 291,985	\$ 32,443	\$ 327,385	\$ 294,646	\$ 32,739	-
08/09	97.6%	102.0%	98.9%	98.7%	\$ 124,446,451	\$ 122,775,000	\$ 1,671,451	\$ 1,651,105	\$ 20,346	\$ 40,692	\$ 20,346	\$ 20,346	\$ -	\$ -	\$ -	\$ 801,000	\$ 720,900	\$ 80,100	\$ 841,692	\$ 741,246	\$ 100,446	-
09/10	97.6%	102.0%	98.4%	98.2%	\$ 71,280,206	\$ 70,027,307	\$ 1,252,899	\$ 1,068,146	\$ 184,753	\$ 369,506	\$ 184,753	\$ 184,753	\$ -	\$ -	\$ -	\$ 801,000	\$ 720,900	\$ 80,100	\$ 1,170,506	\$ 905,653	\$ 264,853	-
10/11	97.6%	102.0%	98.2%	98.1%	\$ 62,505,490	\$ 61,287,238	\$ 1,218,252	\$ 1,058,043	\$ 160,209	\$ 320,418	\$ 160,209	\$ 160,209	\$ -	\$ -	\$ -	\$ 806,750	\$ 726,075	\$ 80,675	\$ 1,127,168	\$ 886,284	\$ 240,884	-
11/12	97.2%	102.0%	91.1%	90.9%	\$ 51,589,560	\$ 46,909,938	\$ 4,679,622	\$ 3,578,362	\$ 1,101,260	\$ 3,235,124	\$ 1,617,562	\$ 1,617,562	\$ -	\$ -	\$ -	\$ 1,487,400	\$ 1,338,660	\$ 148,740	\$ 4,722,524	\$ 3,472,524	\$ 1,250,000	516,302
12/13	97.2%	102.0%	90.9%	90.8%	\$ 45,721,218	\$ 41,495,769	\$ 4,225,449	\$ 3,127,986	\$ 1,097,463	\$ 2,945,282	\$ 1,472,641	\$ 1,472,641	\$ -	\$ -	\$ -	\$ 1,525,367	\$ 1,372,830	\$ 152,537	\$ 4,470,649	\$ 3,220,649	\$ 1,250,000	375,178
					\$ 985,605,887	\$ 963,970,045	\$ 21,635,842	\$ 18,797,554	\$ 2,838,288	\$ 7,459,535	\$ 3,729,768	\$ 3,729,768	\$ 466,079	\$ 419,471	\$ 46,608	\$ 6,774,749	\$ 6,097,274	\$ 677,475	\$ 14,700,363	\$ 11,137,993	\$ 3,562,371	
					100%			87%	13%	50%			50%									

**Notes:** A.) The calculation of GPIM Shared Commodity Savings does NOT reflect the annual cap of \$1,250,000 that is imposed on Atmos. Atmos' GPIM Shared Commodity Savings are actually reduced because of the cap in 11/12 and 12/13.

key: The orange highlighted cells represents amounts that changed from the "as filed, Staff audited" amounts with NGI Index.

key: The yellow highlighted cells indicate Atmos' actual results, that is, invoiced gas costs as a percent of benchmarked gas costs, and were used to reset the low band for the subsequent 3 year PBR review period (actual less 1%).