

STATE OF TENNESSEE

Office of the Attorney General



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April 29, 2015

Sharla Dillion  
Docket Manager  
Tennessee Regulatory Agency  
600 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37242-0001

RE: Docket No. 14-00146 – Petition of Atmos Energy Corporation for a General Rate Case and Petition to Adopt Annual Review Mechanism and ARM Tariff

Dear Ms. Dillon:

Please find attached for filing in the above-referenced docket, an original and four copies of a redacted version of the *Consumer Advocate Division's Responses to the First Discovery Requests of Tennessee Regulatory Authority* ("CAPD Responses"). One response in the CAPD Responses has been redacted solely as a courtesy to Counsel for Atmos Energy.

A non-redacted version of the CAPD Responses also is being filed with the request that the non-redacted version of the CAPD Responses be **treated as confidential** solely as a courtesy to Counsel for Atmos Energy. By extending this courtesy, the Consumer Advocate is expressly reserving its right to use the non-redacted CAPD Responses for any purpose.

Sincerely,

A handwritten signature in blue ink, appearing to read "Wayne M. Irvin".

Wayne M. Irvin  
Assistant Attorney General

cc: Scott Ross (w/ non-redacted CAPD Responses)  
Patricia Childers (w/ non-redacted CAPD Responses)  
Ellen T. Weaver (w/ non-redacted CAPD Responses)

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

**ATMOS ENERGY CORPORATION )  
PETITION FOR GENERAL RATE CASE )  
AND TO ADOPT ANNUAL REVIEW )  
MECHANISM AND ARM TARIFF )**

**Docket No. 14-00146**

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**CONSUMER ADVOCATE AND PROTECTION DIVISION'S RESPONSES TO  
FIRST DISCOVERY REQUESTS OF TENNESSEE REGULATORY AUTHORITY  
TO CONSUMER ADVOCATE AND PROTECTION DIVISION**

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**GENERAL**

**1. Did CAPD include or impute any income or loss generated from BlueFlame Insurance Services into the Revenue Deficiency (Surplus) calculated for Atmos Energy? If so, please provide CAPD's justification for such inclusion or imputation and cite the schedule and workpaper containing the amount and supporting calculations. If not, please provide CAPD's justification for not including.**

**RESPONSE:** (Responsible witness: William H. Novak) No. The CAPD did not impute any income or loss that was generated from BlueFlame Insurance Services into its Revenue Deficiency calculation for Atmos Energy. To the CAPD's knowledge, no such imputation has ever taken place in prior rate cases for Atmos Energy. In addition, the CAPD is not aware of any pending argument for imputing the income/loss from BlueFlame Insurance Services into the base rates of Atmos Energy's Tennessee operations.

**2. Complete the attached pro-forma schedules for the attrition period ending May 31, 2016. The amounts contained in the schedules should be inclusive of the adjustments as referenced in Atmos response to CAPD DR No. 1-058. For each amount in the schedules provide workpapers or a cite to CAPD's existing workpapers supporting the amounts.**

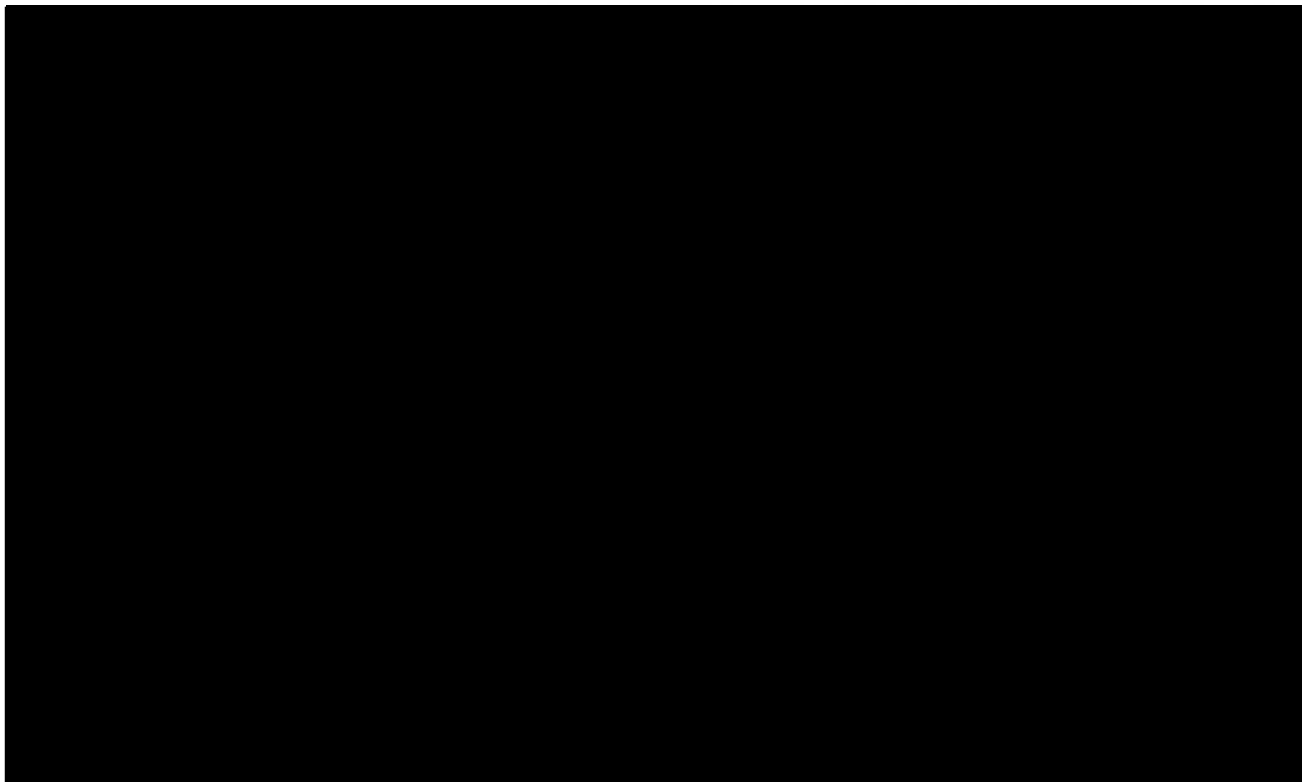
**RESPONSE:** (Responsible witness: William H. Novak) Please see Attachment CAPD 2-1.

**3. What witness will be providing testimony supporting the workpapers of Alex Bradley?**

**RESPONSE:** (Responsible witness: William H. Novak) All of Mr. Bradley's work was conducted under the supervision of Mr. Novak. As such, Mr. Novak's testimony encompasses the analysis carried out by Mr. Bradley.

**4. In the CAPD's Motion filed 4/21/15 it is stated "His supplemental testimony would explain the terms of the Agreement between the parties regarding ADIT and NOLCs and support the Consumer Advocate's position on ADIT and NOLCs in this Docket." Since the TRA's Order has ordered on several occasions that no methodologies were adopted in approving the Settlement between Atmos and the Consumer Advocate, is it CAPD's position that the Authority is bound by the methodologies CAPD alleges were used in Docket No. 12-00064? Please explain your answer.**

**RESPONSE:** (Responsible witness: William H. Novak)




**REVENUES**

**5. Provide a cite to the Workpaper supporting the calculations (sales volumes for added customers) as referenced in the testimony of William H. Novak, page 8, lines 3 through**

**6.**

**RESPONSE:** (Responsible witness: William H. Novak) Please refer to CAPD Revenue Workpapers R-10-2.01 and R-20-2.01 for the calculation of incremental sales volumes from added customers included here as Attachment CAPD 5-1 and Attachment CAPD 5-2.

**6. Please reference Workpaper R-96-1.00 and the amount of \$766,548 for Forfeited Discounts. Please provide the cite containing the calculations and supporting this amount.**

**RESPONSE:** (Responsible witness: William H. Novak) Please refer to CAPD Revenue Workpaper R-96-2.00 included here as Attachment CAPD 6-1.

**7. Please reference Workpaper R-96-2.00. Provide the narrative, containing the cite, for footnote notations B/ and C/.**

**RESPONSE:** (Responsible witness: William H. Novak) Please refer to CAPD's response to Item #6.

**EXPENSES**

**8. Provide a written narrative explaining the calculations and resulting \$11,560,068 depreciation expense for the attrition period ending May 31, 2016.**

**RESPONSE:** (Responsible witness: William H. Novak) Please refer to CAPD Rate Base workpaper RB-50-1.00 which provides the consolidated calculation of \$11,560,068. In general, the depreciation expense for each division (2, 12, 91 and 93) was calculated by first determining the average plant in service for each month of the attrition year (as shown on CAPD Rate Base Schedules RB-51-2.01 to 2.23, RB-52-2.01 to 2.20, RB-53-2.01 to 2.20, and RB-54-2.01 to 2.20) and then applying the current monthly depreciation rate. The monthly accruals of depreciation expense for each division (2, 12, 91 and 93) are summarized on CAPD Rate Base Schedules RB-51-1.00, RB-52-1.00, RB-53-1.00 and RB-54-1.00. The total depreciation expense for each division (2, 12, 91 and 93) is then applied to the appropriate Tennessee allocation factor as shown on CAPD workpaper RB-50-1.00.

**9. Did CAPD include any rate case expense for the attrition period ending May 31, 2016? If so, what amount and explain in detail how this was calculated and why it was included. If not, please explain why no amount was included.**

**RESPONSE:** (Responsible witness: William H. Novak) No. The CAPD included \$96,633 as its total estimated rate case cost which we have amortized over three years to equal \$32,211 for the attrition period. Please refer to rate case expense calculation Rate Base workpaper RB-31-1.00 included here as Attachment CAPD 9-1. Unfortunately, the CAPD's annual rate case expense calculation of \$32,211 was inadvertently omitted from the O&M expenses that are included in the CAPD Exhibit.

#### **RATE BASE**

**10. Provide a written narrative explaining the calculations and resulting \$3,632,272 Customer Deposits for the attrition period ending May 31, 2016.**

**RESPONSE:** (Responsible witness: William H. Novak) \$3,632,272 represents the Company's calculation of Customer Deposits. The CAPD's calculation of Customer Deposits is

\$3,671,279 as shown on CAPD Exhibit, Schedule 2. The CAPD's forecast of Customer Deposits is calculated on CAPD Rate Base Workpaper RB-80-1.00 and included here as Attachment CAPD 10-1. The CAPD calculated attrition period Customer Deposits by taking the average monthly balance from June 2010 through June 2014.

**11. Provide a written narrative explaining the calculations and resulting \$50,578 Interest on Customer Deposits for the attrition period ending May 31, 2016.**

**RESPONSE:** (Responsible witness: William H. Novak) \$50,578 represents the Company's calculation of Interest on Customer Deposits. The CAPD's calculation of Interest on Customer Deposits is \$67,616 as shown on CAPD Exhibit, Schedule 2. The CAPD's forecast of Interest on Customer Deposits is calculated on CAPD Rate Base Workpaper RB-81-1.00 and included here as Attachment CAPD 11-1. The CAPD calculated attrition period Interest on Customer Deposits by taking the average monthly balance from June 2010 through June 2014. The CAPD then calculated the effective historical interest rate on customer deposits by dividing the annual Interest on Customer Deposits by the historical Customer Deposits. The CAPD then applied the effective interest rate to its attrition period Customer Deposits to get the attrition period Interest on Customer Deposits.

**12. Provide a written narrative explaining the calculations and resulting \$1,456,808 State Excise taxes for the attrition period ending May 31, 2016.**

**RESPONSE:** (Responsible witness: William H. Novak) State Excise Taxes of \$1,456,808 are calculated on CAPD Exhibit, Schedule 10. As shown on this schedule, State Excise Taxes are calculated by taking Net Operating Income before Excise & Income Taxes and then making adjustments for AFUDC and Interest Expense to get pre-tax book income. Since the Company currently has a Net Operating Loss for tax purposes (see Section V of Mr. Novak's testimony), all

of the book pre-tax income is deferred as a Schedule M item. The statutory tax rate of 6.5% is then applied to arrive at \$1,456,808 in attrition period State Excise Tax.

**13. Provide a written narrative explaining the calculations and resulting \$7,334,466 Federal Income taxes for the attrition period ending May 31, 2016.**

**RESPONSE:** (Responsible witness: William H. Novak) Federal Income Taxes of \$7,334,466 are calculated on CAPD Exhibit, Schedule 10. As shown on this schedule, Federal Income Taxes are calculated by taking Net Operating Income before Income Taxes and then making adjustments for AFUDC, Interest Expense and State Excise Tax to get pre-tax book income. Since the Company currently has a Net Operating Loss for tax purposes (see Section V of Mr. Novak's testimony), all of the book pre-tax income is deferred as a Schedule M item. The statutory tax rate of 35.0% is then applied to arrive at \$7,334,466 in attrition period Federal Income Taxes.

**14. Provide a written narrative explaining the calculations and resulting 1.620886 Revenue Conversion Factor used in the CAPD's calculated overearnings of Atmos.**

**RESPONSE:** (Responsible witness: William H. Novak) The CAPD's Revenue Conversion Factor is not 1.620886. The CAPD's Revenue Conversion Factor is 1.625966 as shown on CAPD Exhibit, Schedule 13. The purpose of the Revenue Conversion Factor is convert any deficiency (or surplus) in Net Operating Income into a Revenue Requirement. This conversion is carried out by making adjustments for items that change from the attrition period forecast for any TRA Ordered increase (or decrease) in revenues. Items that have a direct correlation to any change in attrition period revenues include forfeited discounts, uncollectible expense and income taxes. The CAPD has included each of these items in its calculation of the Revenue Conversion Factor as shown on CAPD Exhibit, Schedule 13.

**15. Would it be feasible to implement a tracker (with a true-up) rather than disallowing NOLC offsets as proposed by CAPD? Please explain your response.**

**RESPONSE:** (Responsible witness: William H. Novak) The disallowance of NOLC offsets is a choice between alternative methodologies that could be used to determine how an amount is calculated (such as rate base), rather than the estimation of an amount and subsequent true-up to an amount that was actually realized or spent in an account. In other words, the decision to deny NOLC offsets represents a choice as to which amounts would be included in formulas. A tracker (true-up), in contrast, takes an amount that results from the application of formulas or estimations (for example, a budget) and reconciles that amount with the actual amount received or expended. Consequently, since they are essentially unrelated processes, it would appear that it would not be feasible to implement a tracker for NOLC offsets in lieu of disallowing NOLC offsets.

**RATE DESIGN**

**16. Does CAPD have a specific dollar value rate design as referenced on page 9 of the testimony of Mr. Novak?**

**RESPONSE:** (Responsible witness: William H. Novak) No. At this time the CAPD does not have a specific dollar value rate design beyond that mentioned in Mr. Novak's testimony and Schedule 14 of the CAPD Exhibit.

RESPECTFULLY SUBMITTED,



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WAYNE M. MIRVIN (BPR #30946)  
Assistant Attorney General  
Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
(615) 532-5512

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Patricia Childers  
Vice President  
Rates & Regulatory Affairs  
Mid-States Division  
Atmos Energy Corporation  
810 Crescent Centre Drive, Ste. 600  
Franklin, TN 37067-6226

A. Scott Ross, Esq.  
Neal & Harwell, PLC  
2000 One Nashville Place  
150 Fourth Avenue North  
Nashville, TN 37219-2498

Ellen T. Weaver, Esq.  
Senior Attorney  
Atmos Energy Corporation  
P.O. Box 650205  
Dallas, TX 75265-0205

This the 29<sup>th</sup> day of April, 2015.

  
\_\_\_\_\_  
WAYNE M. IRVIN

## Attachment CAPD 2-1

**ATMOS ENERGY CORPORATION**  
Revenue Deficiency (Surplus)  
For the 12 Months Ending May 31, 2016

| Line<br>No. |                                                 | <u>CAPD</u>                 |           |
|-------------|-------------------------------------------------|-----------------------------|-----------|
| 1           | Rate Base                                       | \$ 236,124,979              | A/        |
| 2           | Operating Income At Current Rates               | 19,673,379                  | A/        |
| 3           | Earned Rate Of Return (L2 / L1)                 | 8.33%                       | A/        |
| 4           | Fair Rate Of Return                             | 7.55%                       | A/        |
| 5           | Required Operating Income (L1 * L4)             | 17,825,759                  | A/        |
| 6           | Operating Income Deficiency (Surplus) (L5 - L2) | -1,847,619                  | A/        |
| 7           | Gross Revenue Conversion Factor                 | <u>1.625966</u>             | A/        |
| 8           | <b>Revenue Deficiency (Surplus)</b>             | <b>\$ <u>-3,004,167</u></b> | <b>A/</b> |

A/ CAPD Exhibit, Schedule 1.

**ATMOS ENERGY CORPORATION**  
Rate Base  
For the 12 Months Ending May 31, 2016

| Line<br>No. |                                                   | <b>CAPD</b>              |
|-------------|---------------------------------------------------|--------------------------|
| 1           | Utility Plant in Service                          | \$ 471,880,637 <i>A/</i> |
| 2           | Construction Work in Progress                     | 7,577,821 <i>A/</i>      |
| 3           | Materials and Supplies / Storage Gas              | 6,230,472 <i>A/</i>      |
| 4           | Working Capital/Deferred Rate Case                | 1,339,864 <i>A/</i>      |
| 5           | Net Elimination of Intercompany Leased Property   | 5,322,811 <i>A/</i>      |
| 6           | Deferred Pension Regulated Asset                  | 0 <i>A/</i>              |
| 7           | Total Additions                                   | <u>\$ 492,351,605</u>    |
| Deductions  |                                                   |                          |
| 8           | Accumulated Depreciation                          | \$ 194,632,301 <i>A/</i> |
| 9           | Customer Deposits                                 | 3,671,279 <i>A/</i>      |
| 10          | Contributions and Advances in Aid of Construction | 75,078 <i>A/</i>         |
| 11          | Accumulated Deferred Tax-Accel. Depreciation      | 57,104,291 <i>A/</i>     |
| 12          | Accrued Interest on Customer Deposits             | 67,616 <i>A/</i>         |
| 13          | Reserves                                          | 676,061 <i>A/</i>        |
| 14          | Total Deductions                                  | <u>\$ 256,226,626</u>    |
| 15          | Rate Base                                         | <u>\$ 236,124,979</u>    |

*A/* CAPD Exhibit, Schedule 2.

**ATMOS ENERGY CORPORATION**  
Income Statement  
For the 12 Months Ending May 31, 2016

| Line<br>No. |                                               | <u>CAPD</u>                 |
|-------------|-----------------------------------------------|-----------------------------|
| 1           | Revenues - Sales, forfeited discounts & other | \$ 143,345,737 <i>A/</i>    |
| 2           | Cost of Gas                                   | <u>78,138,740 <i>A/</i></u> |
| 3           | Gross margin on sales and service             | \$ 65,206,997               |
| 4           | AFUDC                                         | <u>66,220 <i>A/</i></u>     |
| 5           | Operating Margin                              | \$ <u>65,273,217</u>        |
| 6           | Other Operation and Maintenance               | \$ 19,010,235 <i>A/</i>     |
| 7           | Interest on Customer Deposits                 | 119,317 <i>A/</i>           |
| 8           | Depreciation and Amortization Exp.            | 11,560,068 <i>A/</i>        |
| 9           | Taxes Other Than Income                       | 6,118,944 <i>A/</i>         |
| 10          | State Excise Tax                              | 1,456,808 <i>A/</i>         |
| 11          | Federal Income Tax                            | <u>7,334,466 <i>A/</i></u>  |
| 12          | Total Operating Expense                       | \$ <u>45,599,838</u>        |
| 13          | Net Operating Income for Return               | \$ <u>19,673,379</u>        |
| 14          | Plus amortization-Gain                        | 0                           |
| 15          | Plus adjustments                              | <u>0</u>                    |
| 16          | Adjusted Net Operating Income                 | \$ <u>19,673,379</u>        |

*A/* CAPD Exhibit, Schedule 6.

**ATMOS ENERGY CORPORATION**  
Operations and Maintenance Expenses  
For the 12 Months Ending May 31, 2016

| Line<br>No. |                              | CAPD          |    |
|-------------|------------------------------|---------------|----|
| 1           | Labor                        | \$ 8,964,442  | A/ |
| 2           | NonLabor                     | 10,045,793    | A/ |
| 3           | Benefits                     |               | B/ |
| 4           | Employee Welfare             |               | B/ |
| 5           | Insurance                    |               | B/ |
| 6           | Rent, Maint., & Utilities    |               | B/ |
| 7           | Vehicles & Equip             |               | B/ |
| 8           | Materials and Supplies       |               | B/ |
| 9           | Information Technologies     |               | B/ |
| 10          | Telecom                      |               | B/ |
| 11          | Marketing                    |               | B/ |
| 12          | Directors & Shareholders &PR |               | B/ |
| 13          | Dues & Donations             |               | B/ |
| 14          | Print & Postage              |               | B/ |
| 15          | Travel & Entertainment       |               | B/ |
| 16          | Training                     |               | B/ |
| 17          | Outside Services             |               | B/ |
| 18          | Provision for Bad Debt       |               | B/ |
| 19          | Miscellaneous                |               | B/ |
| 20          | Rate Case Expense            |               | B/ |
| 21          | Interest Expense             |               | B/ |
| 22          |                              |               |    |
| 23          |                              |               |    |
| 24          |                              |               |    |
| 25          |                              |               |    |
| 26          |                              |               |    |
| 27          |                              |               |    |
| 28          | Total O&M Expense            | \$ 19,010,235 |    |

A/ CAPD Expense Workpaper E-1.0

B/ The CAPD analyzed O&M expense by only segregating the costs between labor and non-labor.  
The CAPD did not analyze O&M expense based on the categories listed above.

**ATMOS ENERGY CORPORATION**  
Operations and Maintenance Expense  
For the 12 Months Ending May 31, 2016

| Line<br>No. |                                     | CAPD                       |
|-------------|-------------------------------------|----------------------------|
| 1           | Property Taxes                      | \$ 3,461,815 A/            |
| 2           | Gross Receipts Tax                  | 1,079,726 A/               |
| 3           | Payroll Taxes                       | 518,997 A/                 |
| 4           | State Franchise Tax                 | 615,857 A/                 |
| 5           | Other General Taxes                 | 19,310 A/                  |
| 6           | TRA Inspection Fee                  | <u>423,239 A/</u>          |
| 7           | Total Taxes Other Than Income Taxes | \$ <u><u>6,118,944</u></u> |

A/ CAPD Exhibit, Schedule 9.

A/ CAPD Tax Workpaper T-1.00.  
B/ Company Exhibit, Schedule 5.

**ATMOS ENERGY CORPORATION**  
Federal and Excise Taxes  
For the 12 Months Ending May 31, 2016

| Line No. |                                       | <b>CAPD</b>             |
|----------|---------------------------------------|-------------------------|
| 1        | Operating Margin                      | \$ 65,273,217 <b>A/</b> |
| 2        | Other Operation and Maintenance       | 19,010,235 <b>A/</b>    |
| 3        | Depreciation and Amortization Expense | 11,560,068 <b>A/</b>    |
| 4        | Taxes Other Than Income               | 6,118,944 <b>A/</b>     |
| 5        | NOI Before Excise and Income Taxes    | \$ 28,583,970           |
| 6        | less AFUDC Error in CAPD Calculation  | -66,220 <b>A/</b>       |
| 7        | less Interest on Customer Deposits    | 119,317 <b>A/</b>       |
| 8        | less Interest Expense                 | 6,118,447 <b>A/</b>     |
| 9        | Pre-tax Book Income                   | \$ 22,412,426           |
| 10       | Schedule M Adjustments                | 0 <b>B/</b>             |
| 11       | Excise Taxable Income                 | \$ 22,412,426           |
| 12       | Excise Tax Rate                       | 6.50% <b>A/</b>         |
| 13       | Excise Tax                            | \$ 1,456,808            |
| 14       | Pre-tax Book Income                   | \$ 22,412,426           |
| 15       | Excise Tax                            | 1,456,808               |
| 16       | Schedule M Adjustments                | 0 <b>B/</b>             |
| 17       | FIT Taxable Income                    | \$ 20,955,618           |
| 18       | FIT Rate                              | 35.00% <b>A/</b>        |
| 19       | Subtotal FIT                          | \$ 7,334,466            |
| 20       | Less: ITC Amortization                | 0                       |
| 21       | Federal Income Tax Expense            | \$ 7,334,466            |

**A/** CAPD Exhibit, Schedule 10.

**B/** Note that the Company operates at a Net Operating Loss for Tax Purposes as noted in Section V of Novak Direct Testimony. Therefore all book income will be deferred, and Schedule M Adjustments should be equal to pre-tax book income. Schedule M adjustments on this schedule are = 0 because TRA template did not allow for current and deferred calculations.

**ATMOS ENERGY CORPORATION**  
Gross Revenue Conversion Factor  
For the 12 Months Ending May 31, 2016

| <u>Line<br/>No.</u> |                                             | <u>Amount</u> | <u>Balance</u>  |
|---------------------|---------------------------------------------|---------------|-----------------|
| 1                   | Operating Revenues                          |               | 1.000000        |
| 2                   | Add: Forfeited Discounts                    | 0.015080 A/   | 0.015080        |
| 3                   | Balance                                     |               | 1.015080        |
| 4                   | Uncollectible Ratio                         | 0.003074 A/   | 0.003120        |
| 5                   | Balance                                     |               | 1.011960        |
| 6                   | State Excise Tax                            | 0.065000 A/   | 0.065777        |
| 7                   | Balance                                     |               | 0.946182        |
| 8                   | Federal Income Tax                          | 0.350000 A/   | 0.331164        |
| 9                   | Balance                                     |               | 0.615018        |
| 10                  | Revenue Conversion Factor (Line 1 / Line 9) |               | <u>1.625966</u> |

A/ CAPD Exhibit, Schedule 13.

**ATMOS ENERGY CORPORATION**  
Cost of Capital

| Line<br>No. |                 | Ratio            | Cost            | Weighted<br>Cost |
|-------------|-----------------|------------------|-----------------|------------------|
| 1           | Short Term Debt | 1.50% <i>A/</i>  | 2.00% <i>A/</i> | 0.03%            |
| 2           | Long Term Debt  | 43.41% <i>A/</i> | 5.90% <i>A/</i> | 2.56%            |
| 3           | Preferred Stock | 0.00% <i>A/</i>  | 0.00% <i>A/</i> | 0.00%            |
| 4           | Common Equity   | 55.09% <i>A/</i> | 9.00% <i>A/</i> | 4.96%            |
| 5           | <b>Total</b>    | <b>100.00%</b>   |                 | <b>7.55%</b>     |

*A/* §CAPD Exhibit, Schedule 12.

## Attachment CAPD 5-1

## Atmos Energy Corporation

4/23/2015 16:58

## Attrition Period Residential (Rate Schedules 210, 211, 225) Sales Volumes

| Line No. |                                      | Bristol Area |                  | Knoxville Area |                  | Nashville Area |                  | Paducah Area   |                | Total          |                  |
|----------|--------------------------------------|--------------|------------------|----------------|------------------|----------------|------------------|----------------|----------------|----------------|------------------|
|          |                                      | Growth       | Bills            | Growth         | Bills            | Growth         | Bills            | Growth         | Bills          | Growth         | Bills            |
| 1        | 12 MTD June 30, 2014                 | A/           | 274,408          |                | 239,877          |                | 864,014          |                | 41,700         |                | 1,419,999        |
| 2        | July 2014                            | A/           | 274,779          | 325            | 240,202          | 1,169          | 865,183          | 56             | 41,756         | 1,921          | 1,421,920        |
| 3        | August                               | A/           | 275,150          | 325            | 240,527          | 1,169          | 866,352          | 56             | 41,812         | 1,921          | 1,423,841        |
| 4        | September                            | A/           | 275,521          | 325            | 240,852          | 1,169          | 867,521          | 56             | 41,868         | 1,921          | 1,425,762        |
| 5        | October                              | A/           | 275,892          | 325            | 241,177          | 1,169          | 868,690          | 56             | 41,924         | 1,921          | 1,427,683        |
| 6        | November                             | A/           | 276,263          | 325            | 241,502          | 1,169          | 869,859          | 56             | 41,980         | 1,921          | 1,429,604        |
| 7        | December                             | A/           | 276,634          | 325            | 241,827          | 1,169          | 871,028          | 56             | 42,036         | 1,921          | 1,431,525        |
| 8        | January, 2015                        | A/           | 277,005          | 325            | 242,152          | 1,169          | 872,197          | 56             | 42,092         | 1,921          | 1,433,446        |
| 9        | February                             | A/           | 277,376          | 325            | 242,477          | 1,169          | 873,366          | 56             | 42,148         | 1,921          | 1,435,367        |
| 10       | March                                | A/           | 277,747          | 325            | 242,802          | 1,169          | 874,535          | 56             | 42,204         | 1,921          | 1,437,288        |
| 11       | April                                | A/           | 278,118          | 325            | 243,127          | 1,169          | 875,704          | 56             | 42,260         | 1,921          | 1,439,209        |
| 12       | May                                  | A/           | 278,489          | 325            | 243,452          | 1,169          | 876,873          | 56             | 42,316         | 1,921          | 1,441,130        |
| 13       | June                                 | A/           | 278,860          | 325            | 243,777          | 1,169          | 878,042          | 56             | 42,372         | 1,921          | 1,443,051        |
| 14       | July                                 | A/           | 279,231          | 325            | 244,102          | 1,169          | 879,211          | 56             | 42,428         | 1,921          | 1,444,972        |
| 15       | August                               | A/           | 279,602          | 325            | 244,427          | 1,169          | 880,380          | 56             | 42,484         | 1,921          | 1,446,893        |
| 16       | September                            | A/           | 279,973          | 325            | 244,752          | 1,169          | 881,549          | 56             | 42,540         | 1,921          | 1,448,814        |
| 17       | October                              | A/           | 280,344          | 325            | 245,077          | 1,169          | 882,718          | 56             | 42,596         | 1,921          | 1,450,735        |
| 18       | November                             | A/           | 280,715          | 325            | 245,402          | 1,169          | 883,887          | 56             | 42,652         | 1,921          | 1,452,656        |
| 19       | December                             | A/           | 281,086          | 325            | 245,727          | 1,169          | 885,056          | 56             | 42,708         | 1,921          | 1,454,577        |
| 20       | January, 2016                        | A/           | 281,457          | 325            | 246,052          | 1,169          | 886,225          | 56             | 42,764         | 1,921          | 1,456,498        |
| 21       | February                             | A/           | 281,828          | 325            | 246,377          | 1,169          | 887,394          | 56             | 42,820         | 1,921          | 1,458,419        |
| 22       | March                                | A/           | 282,199          | 325            | 246,702          | 1,169          | 888,563          | 56             | 42,876         | 1,921          | 1,460,340        |
| 23       | April                                | A/           | 282,570          | 325            | 247,027          | 1,169          | 889,732          | 56             | 42,932         | 1,921          | 1,462,261        |
| 24       | May                                  | A/           | 282,941          | 325            | 247,352          | 1,169          | 890,901          | 56             | 42,988         | 1,921          | 1,464,182        |
| 25       | Attrition Period Bills               |              | 282,941          |                | 247,352          |                | 890,901          |                | 42,988         |                | 1,464,182        |
| 26       | Normalized Usage per Bill (Mcf)      |              | 5,1282           |                | 4,6211           |                | 5,8089           |                | 5,7841         |                | 5,4760           |
| 27       | Attrition Period Residential Volumes |              | <u>1,450,981</u> |                | <u>1,143,050</u> |                | <u>5,176,127</u> |                | <u>249,646</u> |                | <u>8,017,804</u> |
|          |                                      |              |                  |                |                  |                |                  |                |                |                |                  |
|          |                                      | Bristol Area |                  | Knoxville Area |                  | Nashville Area |                  | Paducah Area   |                | Total          |                  |
|          |                                      | Percent      | Amount           | Percent        | Amount           | Percent        | Amount           | Percent        | Amount         | Percent        | Amount           |
| 28       | Attrition Period Bills:              |              |                  |                |                  |                |                  |                |                |                |                  |
| 29       | June, 2015                           | C/           | 23,316           | 8.22%          | 20,332           | 8.29%          | 73,864           | 8.12%          | 3,489          | 8.26%          | 121,001          |
| 30       | July                                 | C/           | 23,218           | 8.21%          | 20,396           | 8.22%          | 73,213           | 8.15%          | 3,502          | 8.22%          | 120,330          |
| 31       | August                               | C/           | 23,145           | 8.18%          | 20,348           | 8.23%          | 72,865           | 8.09%          | 3,478          | 8.16%          | 119,836          |
| 32       | September                            | C/           | 23,062           | 8.15%          | 20,288           | 8.20%          | 73,052           | 8.06%          | 3,467          | 8.19%          | 119,859          |
| 33       | October                              | C/           | 23,300           | 8.23%          | 20,354           | 8.23%          | 73,309           | 8.17%          | 3,514          | 8.23%          | 120,476          |
| 34       | November                             | C/           | 23,566           | 8.33%          | 20,580           | 8.30%          | 73,954           | 8.33%          | 3,579          | 8.31%          | 121,670          |
| 35       | December                             | C/           | 23,734           | 8.39%          | 20,731           | 8.36%          | 74,509           | 8.45%          | 3,634          | 8.37%          | 122,608          |
| 36       | January, 2016                        | C/           | 23,899           | 8.45%          | 20,855           | 8.41%          | 74,893           | 8.54%          | 3,671          | 8.42%          | 123,319          |
| 37       | February                             | C/           | 23,930           | 8.46%          | 20,881           | 8.44%          | 75,190           | 8.60%          | 3,695          | 8.45%          | 123,696          |
| 38       | March                                | C/           | 24,001           | 8.48%          | 20,863           | 8.46%          | 75,358           | 8.60%          | 3,698          | 8.46%          | 123,920          |
| 39       | April                                | C/           | 23,959           | 8.47%          | 20,866           | 8.44%          | 75,183           | 8.52%          | 3,664          | 8.45%          | 123,712          |
| 40       | May                                  | C/           | 23,832           | 8.42%          | 20,824           | 8.47%          | 75,502           | 8.57%          | 3,598          | 8.45%          | 123,756          |
| 41       | Total                                |              | <u>282,941</u>   | <u>100.00%</u> | <u>247,352</u>   | <u>100.00%</u> | <u>890,901</u>   | <u>100.00%</u> | <u>42,988</u>  | <u>100.00%</u> | <u>1,464,182</u> |
| 42       | Summer Bills (May - Sep)             |              | 116,562          |                | 102,191          |                | 368,495          |                | 17,533         |                | 604,781          |
| 43       | Winter Bills (Oct - Apr)             |              | 166,379          |                | 145,161          |                | 522,406          |                | 25,455         |                | 859,401          |
|          | Total                                |              | <u>282,941</u>   |                | <u>247,352</u>   |                | <u>890,901</u>   |                | <u>42,988</u>  |                | <u>1,464,182</u> |

A/ CAPD Revenue Worksheet R-10-2.02.

B/ CAPD Revenue Worksheet R-10-2.03.

C/ CAPD Revenue Worksheet R-10-2.04.

## Attachment CAPD 5-2

| Line No. |                                     | Bristol Area |                  | Knoxville Area |                  | Nashville Area |                  | Paducah Area   |                | Total          |                  |
|----------|-------------------------------------|--------------|------------------|----------------|------------------|----------------|------------------|----------------|----------------|----------------|------------------|
|          |                                     | Growth       | Bills            | Growth         | Bills            | Growth         | Bills            | Growth         | Bills          | Growth         | Bills            |
| 1        | 12 MTD June 30, 2014                | A/           | 65,831           |                | 34,693           |                | 86,787           |                | 6,890          |                | 194,201          |
| 2        | July 2014                           | A/           | 65,885           | 29             | 34,722           | 72             | 86,859           | 6              | 6,896          | 161            | 194,362          |
| 3        | August                              | A/           | 65,939           | 29             | 34,751           | 72             | 86,931           | 6              | 6,902          | 161            | 194,523          |
| 4        | September                           | A/           | 65,993           | 29             | 34,780           | 72             | 87,003           | 6              | 6,908          | 161            | 194,684          |
| 5        | October                             | A/           | 66,047           | 29             | 34,809           | 72             | 87,075           | 6              | 6,914          | 161            | 194,845          |
| 6        | November                            | A/           | 66,101           | 29             | 34,838           | 72             | 87,147           | 6              | 6,920          | 161            | 195,006          |
| 7        | December                            | A/           | 66,155           | 29             | 34,867           | 72             | 87,219           | 6              | 6,926          | 161            | 195,167          |
| 8        | January, 2015                       | A/           | 66,209           | 29             | 34,896           | 72             | 87,291           | 6              | 6,932          | 161            | 195,328          |
| 9        | February                            | A/           | 66,263           | 29             | 34,925           | 72             | 87,363           | 6              | 6,938          | 161            | 195,489          |
| 10       | March                               | A/           | 66,317           | 29             | 34,954           | 72             | 87,435           | 6              | 6,944          | 161            | 195,650          |
| 11       | April                               | A/           | 66,371           | 29             | 34,983           | 72             | 87,507           | 6              | 6,950          | 161            | 195,811          |
| 12       | May                                 | A/           | 66,425           | 29             | 35,012           | 72             | 87,579           | 6              | 6,956          | 161            | 195,972          |
| 13       | June                                | A/           | 66,479           | 29             | 35,041           | 72             | 87,651           | 6              | 6,962          | 161            | 196,133          |
| 14       | July                                | A/           | 66,533           | 29             | 35,070           | 72             | 87,723           | 6              | 6,968          | 161            | 196,294          |
| 15       | August                              | A/           | 66,587           | 29             | 35,099           | 72             | 87,795           | 6              | 6,974          | 161            | 196,455          |
| 16       | September                           | A/           | 66,641           | 29             | 35,128           | 72             | 87,867           | 6              | 6,980          | 161            | 196,616          |
| 17       | October                             | A/           | 66,695           | 29             | 35,157           | 72             | 87,939           | 6              | 6,986          | 161            | 196,777          |
| 18       | November                            | A/           | 66,749           | 29             | 35,186           | 72             | 88,011           | 6              | 6,992          | 161            | 196,938          |
| 19       | December                            | A/           | 66,803           | 29             | 35,215           | 72             | 88,083           | 6              | 6,998          | 161            | 197,099          |
| 20       | January, 2016                       | A/           | 66,857           | 29             | 35,244           | 72             | 88,155           | 6              | 7,004          | 161            | 197,260          |
| 21       | February                            | A/           | 66,911           | 29             | 35,273           | 72             | 88,227           | 6              | 7,010          | 161            | 197,421          |
| 22       | March                               | A/           | 66,965           | 29             | 35,302           | 72             | 88,299           | 6              | 7,016          | 161            | 197,582          |
| 23       | April                               | A/           | 67,019           | 29             | 35,331           | 72             | 88,371           | 6              | 7,022          | 161            | 197,743          |
| 24       | May                                 | A/           | 67,073           | 29             | 35,360           | 72             | 88,443           | 6              | 7,028          | 161            | 197,904          |
| 25       | Attrition Period Bills              |              | 67,073           |                | 35,360           |                | 88,443           |                | 7,028          |                | 197,904          |
| 26       | Normalized Usage per Bill (Mcf)     |              | 31,8655          |                | 30,4741          |                | 28,2536          |                | 24,1472        |                | 28,7286          |
| 27       | Attrition Period Commercial Volumes |              | <b>2,137,314</b> |                | <b>1,077,563</b> |                | <b>2,498,833</b> |                | <b>169,706</b> |                | <b>6,883,416</b> |
|          |                                     |              |                  |                |                  |                |                  |                |                |                |                  |
|          |                                     | Bristol Area |                  | Knoxville Area |                  | Nashville Area |                  | Paducah Area   |                | Total          |                  |
|          |                                     | Percent      | Amount           | Percent        | Amount           | Percent        | Amount           | Percent        | Amount         | Percent        | Amount           |
| 28       | Attrition Period Bills:             |              |                  |                |                  |                |                  |                |                |                |                  |
| 29       | June, 2015                          | C/           | 5,765            | 8.61%          | 3,046            | 8.65%          | 7,650            | 8.75%          | 615            | 8.63%          | 17,075           |
| 30       | July                                | C/           | 5,747            | 8.54%          | 3,021            | 8.58%          | 7,586            | 8.64%          | 607            | 8.57%          | 16,961           |
| 31       | August                              | C/           | 5,607            | 8.36%          | 2,957            | 8.41%          | 7,440            | 8.33%          | 585            | 8.38%          | 16,589           |
| 32       | September                           | C/           | 5,500            | 8.20%          | 2,902            | 8.27%          | 7,311            | 8.14%          | 572            | 8.23%          | 16,286           |
| 33       | October                             | C/           | 5,429            | 8.09%          | 2,860            | 8.09%          | 7,154            | 8.02%          | 563            | 8.09%          | 16,007           |
| 34       | November                            | C/           | 5,401            | 8.05%          | 2,858            | 8.03%          | 7,104            | 8.00%          | 562            | 8.05%          | 15,926           |
| 35       | December                            | C/           | 5,356            | 7.98%          | 2,850            | 8.03%          | 7,104            | 7.93%          | 557            | 8.02%          | 15,867           |
| 36       | January, 2016                       | C/           | 5,475            | 8.10%          | 2,864            | 8.03%          | 7,101            | 8.06%          | 566            | 8.09%          | 16,006           |
| 37       | February                            | C/           | 5,599            | 8.35%          | 2,945            | 8.27%          | 7,310            | 8.33%          | 585            | 8.31%          | 16,439           |
| 38       | March                               | C/           | 5,687            | 8.48%          | 2,999            | 8.44%          | 7,465            | 8.55%          | 601            | 8.46%          | 16,752           |
| 39       | April                               | C/           | 5,749            | 8.57%          | 3,030            | 8.59%          | 7,596            | 8.62%          | 608            | 8.58%          | 16,981           |
| 40       | May                                 | C/           | 5,758            | 8.59%          | 3,028            | 8.62%          | 7,622            | 8.64%          | 608            | 8.60%          | 17,015           |
|          | Total                               |              | <b>67,073</b>    | <b>100.00%</b> | <b>35,360</b>    | <b>100.00%</b> | <b>88,443</b>    | <b>100.00%</b> | <b>7,028</b>   | <b>100.00%</b> | <b>197,904</b>   |
| 41       | Summer Bills (May - Sep)            |              | 28,377           |                | 14,953           |                | 37,609           |                | 2,986          |                | 83,926           |
| 42       | Winter Bills (Oct - Apr)            |              | 38,696           |                | 20,407           |                | 50,834           |                | 4,042          |                | 113,978          |
| 43       | Total                               |              | <b>67,073</b>    |                | <b>35,360</b>    |                | <b>88,443</b>    |                | <b>7,028</b>   |                | <b>197,904</b>   |

A/ CAPD Revenue Workpaper R-20-2.02.

B/ CAPD Revenue Workpaper R-20-2.03.

C/ CAPD Revenue Workpaper R-10-2.04.

## Attachment CAPD 6-1

| Period                  | 2011 A/         | 2012 A/         | 2013 A/         | 2014 A/         | Average           |
|-------------------------|-----------------|-----------------|-----------------|-----------------|-------------------|
| July                    | -39,592         | -28,430         | -26,673         | 32              | -23,666           |
| August                  | -32,654         | -30,251         | -26,199         | -11             | -22,279           |
| September               | -30,373         | -30,434         | -20,276         | -48,036         | -32,280           |
| October                 | -33,521         | -32,905         | -35,865         | -32,876         | -33,792           |
| November                | -41,433         | -48,557         | -41,995         | -26,903         | -39,722           |
| December                | -83,141         | -83,057         | -82,230         | -87,178         | -83,902           |
| January                 | -139,605        | -122,419        | -95,254         | -131,158        | -122,109          |
| February                | -163,506        | -128,222        | -124,325        | -139,191        | -138,811          |
| March                   | -153,487        | -110,149        | -101,490        | -153,073        | -129,550          |
| April                   | -81,845         | -62,678         | -47,831         | -107,068        | -74,855           |
| May                     | -52,691         | -50,514         | 14              | -53,125         | -39,079           |
| June                    | -42,889         | -30,342         | 0               | -32,786         | -26,504           |
| <b>Total</b>            | <b>-894,736</b> | <b>-757,958</b> | <b>-602,126</b> | <b>-811,372</b> | <b>-765,548</b>   |
| <b>Company Forecast</b> |                 |                 |                 |                 | <b>706,749 B/</b> |

**Forfeited Discount Ratio**

|                                      |                |
|--------------------------------------|----------------|
| Attrition Period Forfeited Discounts | \$766,548      |
| Attrition Period Margin              | 63,990,308 C/  |
| <b>Forfeited Discount Ratio</b>      | <b>1.1979%</b> |

A/ CAPD Revenue Workpaper R-96-4.00.  
B/ CAPD Revenue Workpaper R-96-1.05 (Non-Print).  
C/ CAPD Revenue Workpaper R-1.00.

## Attachment CAPD 9-1

WHN Consulting  
 Atmos Energy Corporation  
 DEFERRED RATE CASE EXPENSE

RB-31-1.00

4/23/15 17:31

**Estimated Costs:**

Vander Weide - Rate of Return Testimony  
 Neal & Harwell - Attorney Services  
 Other Consulting Fees  
 Newspaper  
 Postage & Printing  
 Travel  
**Total**

**3 Year Amortization**  
**Montly Amortization**

| Company<br>Estimate | CAPD<br>Estimate |
|---------------------|------------------|
| \$40,000 A/         | \$12,325 B/      |
| 450,000 A/          | 65,215 B/        |
| 0 A/                | 8,444 B/         |
| 0 A/                | 5,408 B/         |
| 5,500 A/            | 1,555 B/         |
| 29,500 A/           | 3,686 B/         |
| <b>\$525,000</b>    | <b>\$96,633</b>  |
|                     | <b>\$32,211</b>  |
|                     | <b>\$2,684</b>   |

**Attrition Period Balance:**

November, 2012  
 December  
 January 2013  
 February  
 March  
 April  
 May  
 June  
 July  
 August  
 September  
 October  
 November

**Total/Average**

| Amortization    | Balance         |
|-----------------|-----------------|
|                 | \$96,633        |
| \$2,684         | 93,949          |
| 2,684           | 91,265          |
| 2,684           | 88,580          |
| 2,684           | 85,896          |
| 2,684           | 83,212          |
| 2,684           | 80,528          |
| 2,684           | 77,843          |
| 2,684           | 75,159          |
| 2,684           | 72,475          |
| 2,684           | 69,791          |
| 2,684           | 67,106          |
| 2,684           | 64,422          |
| <b>\$32,211</b> | <b>\$80,528</b> |

**Attrition Period Amount (No Deferred Balance in Rate Base)**

**\$0**

A/ CAPD Rate Base Workpapers RB-31-9.00.

B/ CAPD Rate Base Workpapers RB-31-1.01.

## Attachment CAPD 10-1

SOURCE: Company Responses to MFR-10 and CAPD 1-1.

| Period                                |    | 2011              | 2012              | 2013              | 2014              | Average           |
|---------------------------------------|----|-------------------|-------------------|-------------------|-------------------|-------------------|
| June                                  | A/ | -3,864,055        | -3,757,006        | -3,655,003        | -3,444,837        | -3,680,225        |
| July                                  | A/ | -3,808,208        | -3,723,336        | -3,607,057        | -3,391,938        | -3,632,635        |
| August                                | A/ | -3,745,222        | -3,616,650        | -3,616,575        | -3,360,293        | -3,584,685        |
| September                             | A/ | -3,725,979        | -3,648,220        | -3,595,962        | -3,340,530        | -3,577,673        |
| October                               | A/ | -3,833,601        | -3,777,791        | -3,761,249        | -3,321,396        | -3,673,510        |
| November                              | A/ | -3,960,254        | -3,856,915        | -3,825,325        | -3,333,255        | -3,743,937        |
| December                              | A/ | -4,037,158        | -3,915,536        | -3,755,335        | -3,369,934        | -3,769,491        |
| January                               | A/ | -4,021,774        | -3,913,036        | -3,716,673        | -3,390,776        | -3,760,565        |
| February                              | A/ | -4,012,161        | -3,894,317        | -3,678,417        | -3,410,607        | -3,748,876        |
| March                                 | A/ | -3,958,244        | -3,832,501        | -3,645,651        | -3,431,899        | -3,717,074        |
| April                                 | A/ | -3,855,902        | -3,776,625        | -3,595,431        | -3,438,742        | -3,666,675        |
| May                                   | A/ | -3,773,986        | -3,709,337        | -3,482,271        | -3,406,076        | -3,592,917        |
| June                                  | A/ | -3,757,006        | -3,655,003        | -3,444,837        | -3,456,608        | -3,578,364        |
| 13 MONTH AVERAGE                      |    | <u>-3,873,350</u> | <u>-3,775,098</u> | <u>-3,644,599</u> | <u>-3,392,069</u> | <u>-3,671,279</u> |
| Interest Rate on Customer Deposits    |    |                   |                   |                   |                   | 0.0325 C/         |
| Interest Expense on Customer Deposits |    |                   |                   |                   |                   | <u>-119,317</u>   |

Company Forecast

-3,632,272 B/

LINK TO COMPANY WORKPAPERS (Rate Base Tab):

\\Company Filing-Non Confidential\\Model Relied Files\\Relied Upons\\Plant Balances 2015 TN Case.xlsx

A/ CAPD Rate Base Workpaper RB-80-2.00.

B/ CAPD Rate Base Workpaper RB-80-9.00.

C/ CAPD Rate Base Workpaper RB-80-1.01.

## Attachment CAPD 11-1

SOURCE: Company Responses to MFR-10 and CAPD 1-1.

| Period           |    | 2011         | 2012         | 2013         | 2014         | Average    |
|------------------|----|--------------|--------------|--------------|--------------|------------|
| June             | A/ | -73,556      | -18,231      | -90,142      | -20,291      | -50,555    |
| July             | A/ | -84,144      | -27,857      | -100,113     | -31,162      | -60,819    |
| August           | A/ | -110,634     | -39,387      | -98,076      | -41,913      | -72,503    |
| September        | A/ | -104,299     | -51,173      | -105,680     | -73,804      | -83,739    |
| October          | A/ | -114,202     | -62,148      | -115,161     | -81,802      | -93,328    |
| November         | A/ | -123,977     | -72,865      | -124,029     | -89,866      | -102,684   |
| December         | A/ | -136,674     | -15,754      | 11,328       | -98,712      | -59,953    |
| January          | A/ | -147,378     | -21,549      | 4,332        | -107,835     | -68,107    |
| February         | A/ | -156,389     | -33,506      | -7,402       | -2,455       | -49,938    |
| March            | A/ | -164,776     | -45,533      | 10,737       | -17,056      | -54,157    |
| April            | A/ | -169,214     | -69,780      | 2,708        | -40,547      | -69,208    |
| May              | A/ | -174,717     | -80,175      | 3,555        | -61,671      | -78,252    |
| June             | A/ | -18,231      | -90,142      | -20,291      | -50,328      | -44,748    |
| 13 MONTH AVERAGE |    | -121,399     | -48,315      | -48,326      | -55,188      | -68,307    |
| Average Deposits |    | -3,873,350 B | -3,775,098 B | -3,644,599 B | -3,392,069 B | -3,671,279 |
| Percentage       |    | 3.13%        | 1.28%        | 1.33%        | 1.63%        | 1.84%      |
| Forecast         |    |              |              |              |              | -67,616    |

Company Forecast

-50,578 C/

NOTE: Company increases the test period by 3.5% (without any support).  
Waiting on missing data to determine how the account is actually growing.

LINK TO COMPANY WORKPAPERS (Rate Base Tab):

..Company Filing-Non Confidential\Model Relied Files\Relied Upons\Plant Balances 2015 TN Case.xlsx

A/ CAPD Rate Base Workpaper RB-81-2.00.

B/ CAPD Rate Base Workpaper RB-80-1.00.

C/ CAPD Rate Base Workpaper RB-81-9.00.