

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:	)	
	)	
RESPONSE OF ATMOS ENERGY	)	DOCKET NO.
CORPORATION TO THE	)	18-00034
COMMISSION'S ORDER OPENING	)	
AN INVESTIGATION AND	)	
REQUIRING DEFERRED	)	
ACCOUNTING TREATMENT	)	

**CONSUMER ADVOCATE'S RESPONSE TO THE TENNESSEE PUBLIC UTILITY
COMMISSION'S FIRST DATA REQUEST**

Comes the Consumer Advocate Unit of the Office of the Attorney General (Consumer Advocate) and hereby responds to the First Data Requests of the Tennessee Public Utility Commission (TPUC or Commission) to the Consumer Advocate filed on February 1, 2019. Each of the nine discovery requests are set out on separate pages for ease of use by TPUC Staff and Atmos Energy Corporation (Atmos Energy).

**Atmos Energy Tax Docket
TPUC Docket No. 18-00034
TPUC's First Data Request
Date Issued: February 1, 2019**

- 1-1. Provide position on whether amortization of Protected excess ADIT should be an income tax expense or a credit to amortization expense. Provide justification for your position.**

RESPONSE:

The amortization of both Protected and Unprotected excess ADIT should be a credit to Income Tax Expense. Both items arise from the cancellation of Income Tax Expense that was originally recorded at the 35% federal tax rate. The Tax Cut and Jobs Act (TCJA) effectively cancelled a portion of future federal income tax payments, resulting in certain charges to Income Tax Expense that were excessive. The accounting which gave rise to the excess ADIT was a charge to Income Tax Expense and a credit to Accumulated Deferred Income Taxes (ADIT). With the lowering of the federal income tax rate, the historic recordings to Income Tax Expense were overstated. The refund to customers should give rise to a credit to Income Tax Expense since this same account was used to record the initial charge to Income Tax Expense at the 35% rate.

Response provided by the Consumer Advocate on February 7, 2019.

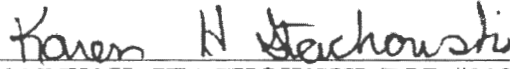
1-2. Complete the attached Schedule No. 1 and Consumer Advocate Schedule No. 2.

RESPONSE:

Please see the attached schedules and supporting workpapers.

Response provided by the Consumer Advocate on February 7, 2019.

RESPECTFULLY SUBMITTED,



KAREN H. STACHOWSKI (BPR #019607)

Assistant Attorney General

DANIEL P. WHITAKER, III (BPR #035410)

Assistant Attorney General

Office of the Tennessee Attorney General

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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:

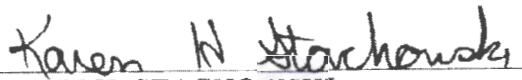
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This the 7th day of February, 2019.


KAREN H. STACHOWSKI
Assistant Attorney General

	Atmos	Consumer Advocate
Excess ADIT	\$ 29,024,530	\$ 29,024,530 A/
Unprotected ADIT	(672,969)	(672,969) A/
Adjustments:		
Reclassify Repair Deduction		10,617,470 C/
Eliminate ADIT Associated with Excluded O&M		218,668 D/
Adjusted Unprotected ADIT	\$ (672,969)	\$ 10,163,169
Proposed Amortization Period	28	3
Protected ADIT	29,697,498	29,697,498 A/
Adjustment:		
Reclassify Repair Deduction		(10,617,470) C/
Adjusted Protected ADIT	\$ 29,697,498	\$ 19,080,028
Proposed Amortization Period - Unprotected	28	3
Proposed Amortization Period - Protected	28	28

Provide schedule with supporting calculations for all amounts or reference to specific schedule/workpaper previously provided.

Atmos Corporation
Schedule 2

Total	Atmos Class Excess ADIT Deferred Income Taxes	Atmos Customer Count	Atmos Average Excess ADIT per Customer
Excess Protected ADIT	\$ 29,697,498		
Class of Customer			
Residential	14,581,333	127,021 B/	118
Commercial	8,636,510	16,547 B/	514
Industrial	1,227,995	352 B/	3,488
Public Authority	93,747	697 B/	135
Transportation	4,557,914	117 B/	39,096
Excess Protected ADIT	\$ 29,697,498	\$ 144,733	
Excess UnProtected ADIT	\$ (672,969)		
Class of Customer			
Residential	(339,489)	127,021 B/	(3)
Commercial	(200,242)	16,547 B/	(12)
Industrial	(27,827)	352 B/	(79)
Public Authority	(2,124)	697 B/	(3)
Transportation	(103,286)	117 B/	(886)
Excess UnProtected ADIT	\$ (672,969)	\$ 144,733	

Provide schedule with supporting calculations for all amounts or reference to specific schedule/workpaper previously provided.

Consumer Advocate
Schedule 2

	Consumer Advocate Class Excess ADIT Deferred Income Taxes	Consumer Advocate Customer Count	Consumer Advocate Average Excess ADIT per Customer
Excess Protected ADIT	\$ 19,080,028		
Class of Customer			
Residential	9,825,196 E/	127,021 B/	76
Commercial	5,677,275 E/	16,547 B/	343
Industrial	788,961 E/	352 B/	2,241
Public Authority	60,231 E/	697 B/	86
Transportation	2,928,365 E/	117 B/	25,118
Excess Protected ADIT	\$ 19,080,028	\$ 144,733	
Excess UnProtected ADIT	\$ 10,163,169		
Class of Customer			
Residential	5,126,958 F/	127,021 B/	40
Commercial	3,024,058 F/	16,547 B/	183
Industrial	420,148 F/	352 B/	1,194
Public Authority	32,083 F/	697 B/	46
Transportation	1,559,873 F/	117 B/	13,379
Excess UnProtected ADIT	\$ 10,163,169	\$ 144,733	

Provide schedule with supporting calculations for all amounts or reference to specific schedule/workpaper previously provided.

Dkt No. 18-00034, Atmos Updated Financials, Filed 11-21-18, also see attached file submitted by Atmos to Consumer Advocate 12/6/18; TN

- A/ Excess Deferrals 9-30-18 Plant and Non Plant
B/ Dkt No. 18-00097, Exhibit GW-3 Reconciliation Revenue Requirement Model.xls, Sch 11-5, (Column H totals by customer type / 12)
C/ Dkt No. 18-00014, Exhibit DND-3
D/ Dkt No. 18-00034, Table DND-2
E/ Tab. Unprotected EDIT Spread
F/ Tab. Protected EDIT Spread

Atmos Energy Corporation
Regulatory Liability Analysis
9/30/2018

File TN Excess Deferrals 9-30-18 Plant and Non Plant
Received via e-mail from Scott Ross, 12/6/18 11:01 a.m.

	Excess Deferrals Excl Gross Up			Excess Deferrals by Type Excl Gross Up			Gross Up by Type			Regulatory Liability Incl Gross Up by Type		
	After TCJA	Before TCJA	Change	Plant	Non Plant	Total	Plant	Non Plant	Total	Plant	Non Plant	Total
	(DTL)/DTA	(DTL)/DTA	(suspense)/benefit									
Tennessee (093)	(58,857,346)	(96,880,381)	38,023,035	36,506,215	1,516,870	38,023,035	10,792,044	448,406	11,240,449	47,298,258	1,965,226	49,263,484
Allocated from Div 002	28,011,136	44,048,632	(16,037,496)	(14,312,751)	(1,724,745)	(16,037,496)	(4,231,165)	(509,873)	(4,741,038)	(18,543,916)	(2,234,618)	(20,778,534)
Allocated from Div 012	(904,417)	(1,410,403)	505,986	479,899	26,087	505,986	141,889	7,712	149,581	621,768	33,799	655,567
Allocated from Div 091	(219,767)	(130,244)	(89,523)	248,057	(337,580)	(89,523)	79,331	(99,796)	(20,465)	321,388	(437,376)	(115,988)
Total TN	(31,970,389)	(54,372,396)	22,402,008	22,921,420	(518,417)	22,402,008	6,776,078	(189,951)	6,622,527	29,697,488	(672,989)	29,024,530

Atmos Energy Corporation
Docket No. 18-00067
Calculation of EDIT Associated with Repair Allowance
Amended Exhibit DND-3

Tax Period	A/ Annual Repair Deduction	B/ Annual Book Depreciation
9/30/2010	5,780,634	87,796
9/30/2011	6,508,106	285,317
9/30/2012	6,186,775	499,238
9/30/2013	6,104,295	724,386
9/30/2014	12,072,097	1,106,480
9/30/2015	11,142,193	1,533,525
9/30/2016	8,771,959	1,876,703
9/30/2017 **	11,683,343	2,223,093
Total	68,249,402	8,336,538
Excess Repair Deduction over Book Depreciation	59,912,864	
Effective Tax Rate @ 35% Federal Income Tax Rate	39.23%	
Effective Tax Rate @ 21% Federal Income Tax Rate		26.14%
ADIT Associated with Repair Deduction	23,500,821	15,658,227
Difference	7,842,594	
Divided by Reciprocal Tax Factor	73.87%	
Excess ADIT Gross of Tax	10,617,470	
Annual Amortization - 3 years	3,539,157	

A/ Docket No. 18-00097 CPAD_2-05_Att1 - Repair Deduction in Division 093

B/ See tab Exh DND-3 pg 4

Effective Tax Rates

State	0.065		0.065
Federal	0.35		0.21
Income Subject to Federal Tax (1 - State Tax Rate)	0.935		0.935
Federal Tax Factor (Income Subject to Federal Tax * Federal Rate)	0.32725		0.19635
Total Composite Income Tax Factor	39.23%		26.14%
Reciprocal Tax Factor	60.78%		73.87%

Atmos Energy Corporation
Docket No. 18-00034
Calculation of EDIT Associated with Repair Allowance

Source: tab DND-3 pgs 5-19

AMENDED EXHIBIT DND-3

Gross Plant Additions

FYE September	38000-Services	37601-Mains - Steel	37602-Mains - Plastic	Total
2010	3,609,656	1,683,398	3,494,404	8,787,459
2011	3,690,980	1,521,998	5,777,523	10,990,500
2012	3,642,229	686,685	6,106,535	10,435,449
2013	3,305,663	944,665	7,872,262	12,122,589
2014	4,139,310	10,265,311	11,799,369	26,203,990
2015	4,414,841	2,428,517	9,785,820	16,629,179
2016	5,511,850	2,093,690	11,119,628	18,725,168
2017	5,918,633	3,503,261	17,315,015	26,736,909

Additional Depreciation Expense

FYE September	38000-Services	37601-Mains - Steel	37602-Mains - Plastic	Total
2010	72,554	33,500	69,539	175,592
2011	74,189	30,288	114,973	219,449
2012	73,209	13,665	121,520	208,394
2013	66,444	18,799	156,658	241,901
2014	83,200	204,280	734,807	922,287
2015	88,738	48,327	194,738	331,804
2016	(89,444)	(7,678)	75,468	(21,654)
2017	109,495	67,263	330,717	507,474

Gross Plant

FYE September	38000-Services	37601-Mains - Steel	37602-Mains - Plastic	Total
2009	96,830,491	50,865,019	126,310,239	274,005,739
2010	100,440,147	52,548,418	129,804,633	282,793,198
2011	104,131,127	54,070,415	135,582,156	293,783,698
2012	107,773,356	54,757,100	141,688,691	304,219,148
2013	111,079,019	55,701,765	149,560,953	316,341,737
2014	115,218,329	65,967,076	161,360,322	342,545,727
2015	119,633,170	68,395,594	171,146,142	359,174,906
2016	125,145,020	70,489,783	182,265,770	377,900,073
2017	131,063,653	73,997,544	199,580,785	404,636,983

Depreciation Expense

FYE September	38000-Services	37601-Mains - Steel	37602-Mains - Plastic	Total
2009	1,946,293	1,012,214	2,513,574	5,472,080
2010	2,018,847	1,045,714	2,583,112	5,647,673
2011	2,093,036	1,076,001	2,698,085	5,867,122
2012	2,166,244	1,089,666	2,819,605	6,075,516
2013	2,232,688	1,108,465	2,976,263	6,317,416
2014	2,315,888	1,312,745	3,211,070	6,839,704
2015	2,404,627	1,361,072	3,405,808	7,171,507
2016	2,315,183	1,353,394	3,481,276	7,149,853
2017	2,424,678	1,470,657	3,811,993	7,657,327
Total Accum Dep	19,917,484	10,779,928	27,500,786	58,198,199

New Depreciation Rates in effect Feb of 2016 see docket 15-00089

Division 093	
Repairs Deduction	
9/30/2009	(6,532,874) Excluded in Exhibit DND-3
9/30/2010	(5,780,634)
9/30/2011	(6,508,106)
9/30/2012	(6,186,775)
9/30/2013	(6,104,295)
9/30/2014	(12,072,097)
9/30/2015	(11,142,193)
9/30/2016	(8,771,959)
	*** estimated repairs deduction
9/30/2017 **	(11,683,343) calculated at FY17 annual provision
	(74,782,275)

Calculation of Depreciation Expense associated with repair plant

Account 380 Services	A/ Annual		A/ Depreciation	
	Incremental Investment	Cumulative Investment	Rate	Expense Mid-Year Conv
2010	3,609,656	3,609,656	2.01%	36,277
2011	3,690,980	7,300,636	2.01%	109,648
2012	3,642,229	10,942,866	2.01%	183,347
2013	3,305,663	14,248,528	2.01%	253,174
2014	4,139,310	18,387,838	2.01%	327,995
2015	4,414,841	22,802,679	2.01%	413,965
2016	5,511,850	28,314,529	1.85%	509,318
2017	5,918,633	34,233,162	1.85%	578,566

34,233,162

Total Estimated Depreciation - Services

2,412,291

Account 37601 Mains Steel	A/ Annual		A/ Depreciation	
	Incremental Investment	Cumulative Investment	Rate	Expense Mid-Year Conv
2010	\$ 1,683,398	1,683,398	1.99%	16,750
2011	1,521,998	3,205,396	1.99%	48,644
2012	686,685	3,892,081	1.99%	70,620
2013	944,665	4,836,745	1.99%	86,852
2014	10,265,311	15,102,057	1.99%	198,391
2015	2,428,517	17,530,574	1.99%	324,695
2016	2,093,690	19,624,264	1.92%	368,958
2017	3,503,261	23,127,525	1.92%	410,417

23,127,525

Total Estimated Depreciation - Steel Mains

1,525,326

Account 37602 Mains Plastic	A/ Annual		A/ Depreciation	
	Incremental Investment	Cumulative Investment	Rate	Expense Mid-Year Conv
2010	\$ 3,494,404	\$ 3,494,404	1.99%	34,769
2011	5,777,523	9,271,927	1.99%	127,025
2012	6,106,535	15,378,462	1.99%	245,271
2013	7,872,262	23,250,724	1.99%	384,360
2014	11,799,369	35,050,093	1.99%	580,093
2015	9,785,820	44,835,913	1.99%	794,866
2016	11,119,628	55,955,541	1.91%	998,427
2017	17,315,015	73,270,556	1.91%	1,234,109

Total Estimated Depreciation - Plastic Mains

4,398,921

Accumulated Depreciation Summary

Account 37601 Steel Mains	1,525,326
Account 37602 Plastic Mains	4,398,921
Account 380 Services	2,412,291

Total

8,336,538

	Annual Investment	Annual Book Depreciation
2010	8,787,459	87,796
2011	10,990,500	285,317
2012	10,435,449	499,238
2013	12,122,589	724,386
2014	26,203,990	1,106,480
2015	16,629,179	1,533,525
2016	18,725,168	1,876,703
2017	26,736,909	2,223,093
	130,631,243	8,336,538

Financial Statement Data										Accounting Information									
Item	Value	Value	Value	Value	Value	Value	Value	Value	Value	Item	Value	Value	Value	Value	Value	Value	Value	Value	Value
1	1000	1000	1000	1000	1000	1000	1000	1000	1000	1	1000	1000	1000	1000	1000	1000	1000	1000	1000
2	2000	2000	2000	2000	2000	2000	2000	2000	2000	2	2000	2000	2000	2000	2000	2000	2000	2000	2000
3	3000	3000	3000	3000	3000	3000	3000	3000	3000	3	3000	3000	3000	3000	3000	3000	3000	3000	3000
4	4000	4000	4000	4000	4000	4000	4000	4000	4000	4	4000	4000	4000	4000	4000	4000	4000	4000	4000
5	5000	5000	5000	5000	5000	5000	5000	5000	5000	5	5000	5000	5000	5000	5000	5000	5000	5000	5000
6	6000	6000	6000	6000	6000	6000	6000	6000	6000	6	6000	6000	6000	6000	6000	6000	6000	6000	6000
7	7000	7000	7000	7000	7000	7000	7000	7000	7000	7	7000	7000	7000	7000	7000	7000	7000	7000	7000
8	8000	8000	8000	8000	8000	8000	8000	8000	8000	8	8000	8000	8000	8000	8000	8000	8000	8000	8000
9	9000	9000	9000	9000	9000	9000	9000	9000	9000	9	9000	9000	9000	9000	9000	9000	9000	9000	9000
10	10000	10000	10000	10000	10000	10000	10000	10000	10000	10	10000	10000	10000	10000	10000	10000	10000	10000	10000

Accounting Information

Income Statement		Balance Sheet		Cash Flow Statement	
2019	2018	2019	2018	2019	2018
Revenue	1,234,567	Assets	5,678,901	Operating Activities	1,234,567
Cost of Sales	(345,678)	Liabilities	(2,345,678)	Investing Activities	(456,789)
Gross Profit	888,889	Equity	3,456,789	Financing Activities	(123,456)
Operating Expenses	(234,567)				
Operating Profit	654,321				
Other Income	123,456				
Profit Before Tax	777,777				
Tax Expense	(123,456)				
Net Profit	654,321				
Dividends Paid	(123,456)				
Retained Earnings	530,865				

12 Mos Ended May 31, 2018
Excess Deferred Balance

Account 2530 - 27909

10,163,169 A/

Description	B/				EDIT ' Percentage of total Margin
	Actual Base Count	Actual Volumes Mcf	Actual Margin Rev	Percent of total Margin	
RESIDENTIAL					
210 Residential Gas Service (Summer)	626,711	1,006,816	\$ 12,576,749	15.73%	1,598,563
210 Residential Gas Service (Winter) (weather sensitive)	894,302	7,032,716	\$ 27,751,455	34.71%	3,527,337
210 Residential Gas Service Senior Citizen (Summer)	532	528	\$ 741	0.00%	94
210 Residential Gas Service Senior Citizen (Winter) (weather sensitive)	691	5,015	\$ 7,151	0.01%	909
211 Residential/Sm. Commercial/Industrial Heating & Cooling Service	12	275	\$ 431	0.00%	55
Total Residential	1,524,248	8,045,351	40,336,526	50.45%	5,126,958
COMMERCIAL					
211 Residential/Sm. Commercial/Industrial Heating & Cooling Service	12	132	\$ 312	0.00%	40
220 Commercial Gas Service (weather sensitive)	198,535	5,496,430	\$ 23,775,176	29.73%	3,021,934
230 Large Commercial Gas Service (weather sensitive)	-	0	\$ -	0.00%	-
250 Commercial Interruptible Gas Service	0	0	\$ 0	0.00%	-
293 Large Tonnage Air Conditioning Gas Service	12	11,573	\$ 16,394	0.02%	2,084
Total Commercial	198,559	5,508,135	23,791,883	29.76%	3,024,058
INDUSTRIAL					
220 Industrial Gas Service (weather sensitive)	3823	683,585	\$ 2,077,104	2.60%	264,009
230 Large Industrial Gas Service	75	50,384	\$ 156,678	0.20%	19,915
240 DEMAND/COMM GS	0	-	\$ -	0.00%	-
250 Industrial Interruptible Gas Service	285	843,888	\$ 1,024,906	1.28%	130,270
280/250 Economic Development Gas Service	30	41,762	\$ 42,016	0.05%	5,340
292 Cogeneration, CNG, Prime Movers Service	12	-	\$ 5,613	0.01%	713
Total Industrial	4,225	1,619,618	3,306,317	4.14%	420,248
PUBLIC AUTHORITY					
211 Residential/Sm. Commercial/Industrial Heating & Cooling Service	-	-	\$ -	0.00%	-
221 Experimental School Gas Service	36	25,799	\$ 38,008	0.05%	4,831
225 Public Authority Gas Service (Sr. Citizen) (Summer)	-	-	\$ -	0.00%	-
225 Public Authority Gas Service (Sr. Citizen) (Winter) (weather Sensitive)	-	-	\$ -	0.00%	-
225 Public Authority Gas Service (Summer)	3,126	7,264	\$ 65,724	0.08%	8,354
225 Public Authority Gas Service (Winter) (weather Sensitive)	5,201	31,944	\$ 148,678	0.19%	18,898
Total Public Authority	8,363	65,007	252,410	0.32%	32,083
TRANSPORTATION					
260 - TRANSP (220 SML COM/INDG)	135	148,327	\$ 471,281	0.59%	59,902
260 - TRANSP (250 LRG COM/INDG)	502	1,444,889	\$ 3,711,614	4.64%	471,763
260 - TRANSP (240 DEMAND)	69	397,664	\$ 789,190	0.99%	100,310
260 - TRANSP (250 OPT GS)	635	5,075,942	\$ 5,489,227	6.87%	697,706
260 - TRANSP (280/240 ECON DEV/DEMAND)	-	-	\$ -	0.00%	-
260 - TRANSP (280/250 ECON DEV - OPT GS)	24	954,160	\$ 785,909	0.98%	99,893
Special Contracts	34	3,049,684	\$ 1,024,745	1.28%	130,250
Total Transportation	1,399	11,070,666	12,271,966	15.35%	1,559,823
TOTALS	1,736,794	26,308,777	78,959,102	100.00%	10,163,169

A/ Schedule 1, cell I17

B/ 3) 2018-08-31 TN Annual Reconciliation Filing - Exhibit GWK-1 Reconciliation Revenue Requirement Model, Schedule 11-5

12 Mos Ended May 31, 2018
Excess Deferred Balance

Account 2530 - 27909

19,080,028 A/

Description	B/				EDIT * Percentage of total Margin
	Actual Base Count	Actual Volumes Mcf	Actual Margin Rev	Percent of total Margin	
RESIDENTIAL					
210 Residential Gas Service (Summer)	628,711	1,006,818	\$ 12,576,748	15.73%	3,001,093
210 Residential Gas Service (Winter) (weather sensitive)	894,302	7,032,718	\$ 27,751,455	34.71%	6,622,117
210 Residential Gas Service Senior Citizen (Summer)	532	528	\$ 741	0.00%	177
210 Residential Gas Service Senior Citizen (Winter) (weather sensitive)	691	5,016	\$ 7,161	0.01%	1,706
211 Residential/Sm. Commercial/Industrial Heating & Cooling Service	12	275	\$ 431	0.00%	103
Total Residential	1,524,248	8,045,351	40,338,526	50.45%	9,625,196
COMMERCIAL					
211 Residential/Sm. Commercial/Industrial Heating & Cooling Service	12	132	\$ 312	0.00%	74
220 Commercial Gas Service (weather sensitive)	198,535	5,496,430	\$ 23,775,176	29.73%	5,673,288
230 Large Commercial Gas Service (weather sensitive)	-	0	\$ -	0.00%	-
250 Commercial Interruptible Gas Service	0	0	\$ 0	0.00%	-
293 Large Tonnage Air Conditioning Gas Service	12	11,573	\$ 16,394	0.02%	3,912
Total Commercial	198,559	5,508,135	23,791,883	29.76%	5,677,275
INDUSTRIAL					
220 Industrial Gas Service (weather sensitive)	3823	683,585	\$ 2,077,104	2.60%	495,643
230 Large Industrial Gas Service	75	50,384	\$ 158,678	0.20%	37,387
240 DEMAND/COMM GS	0	-	\$ -	0.00%	-
250 Industrial Interruptible Gas Service	285	843,888	\$ 1,024,906	1.28%	244,565
280/250 Economic Development Gas Service	30	41,762	\$ 42,016	0.05%	10,026
292 Cogeneration, CNG, Prime Movers Service	12	-	\$ 5,813	0.01%	1,339
Total Industrial	4,225	1,619,618	3,308,317	4.14%	788,961
PUBLIC AUTHORITY					
211 Residential/Sm. Commercial/Industrial Heating & Cooling Service	-	-	\$ -	0.00%	-
221 Experimental School Gas Service	36	25,799	\$ 38,008	0.05%	9,070
225 Public Authority Gas Service (Sr. Citizen) (Summer)	-	-	\$ -	0.00%	-
225 Public Authority Gas Service (Sr. Citizen) (Winter) (weather Sensitive)	-	-	\$ -	0.00%	-
225 Public Authority Gas Service (Summer)	3,126	7,264	\$ 65,724	0.08%	15,683
225 Public Authority Gas Service (Winter) (weather Sensitive)	5,201	31,944	\$ 148,678	0.19%	35,478
Total Public Authority	8,363	65,007	252,410	0.32%	60,231
TRANSPORTATION					
260 - TRANSP (220 SML COMINDG)	135	148,327	\$ 471,281	0.59%	112,458
260 - TRANSP (230 LRG COMINDG)	502	1,444,889	\$ 3,711,614	4.64%	885,674
260 - TRANSP (240 DEMAND)	68	397,864	\$ 788,190	0.99%	188,318
260 - TRANSP (250 OPT GS)	835	5,075,942	\$ 5,488,227	6.87%	1,309,852
260 - TRANSP (280/240 ECON DEV/DEMAND)	-	-	\$ -	0.00%	-
260 - TRANSP (260/250 ECON DEV - OPT GS)	24	954,160	\$ 785,909	0.98%	187,536
Special Contracts	34	3,049,684	\$ 1,024,745	1.28%	244,527
Total Transportation	1,398	11,078,886	12,271,866	15.35%	2,928,365
TOTALS	1,736,794	26,308,777	79,959,102	100.00%	19,080,028

A/ Schedule 1, cell I28

B/ 3/ 2018-08-31 TN Annual Reconciliation Filing - Exhibit GKW-1 Reconciliation Revenue Requirement Model, Schedule 11-5

David N. Dittmore

From: Scott Ross <sross@nealharwell.com>
Sent: Thursday, December 6, 2018 11:01 AM
To: Karen H. Stachowski
Cc: Vance Broemel; Daniel P. Whitaker; Emily Knight; David N. Dittmore; greg.waller@atmosenergy.com; Kevin.Frank@atmosenergy.com; Taylor, Brannon C.; mark.martin@atmosenergy.com; Phyllis Dickens
Subject: Atmos -- Protected and Unprotected excess ADIT update
Attachments: TN Excess Deferreds 9-30-18 Plant and NonPlant.xlsx

Karen: The update is attached.

Scott Ross

Neal & Harwell, PLC
1201 Demonbreun Street, Suite 1000
Nashville, TN 37203
(615) 244-1713
sross@nealharwell.com
www.nealharwell.com

-----Original Message-----

From: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>
Sent: Tuesday, December 4, 2018 11:18 AM
To: Scott Ross <sross@nealharwell.com>; Tammy L. Morris <tmorris@nealharwell.com>
Cc: Vance Broemel <Vance.Broemel@ag.tn.gov>; Daniel P. Whitaker <Daniel.Whitaker@ag.tn.gov>; Emily Knight <Emily.Knight@ag.tn.gov>; David N. Dittmore <David.Dittmore@ag.tn.gov>
Subject: RE: Atmos filing

Thanks for the update.

Karen H. Stachowski | Assistant Attorney General Consumer Protection and Advocate Division Office of the Tennessee Attorney General UBS Building, 20th Floor
315 Deaderick Street, Nashville, Tennessee 37243 Mailing Address:
P.O. Box 20207, Nashville, Tennessee 37202 p. 615.741.2370 Karen.Stachowski@ag.tn.gov

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-----Original Message-----

From: Scott Ross <sross@nealharwell.com>
Sent: Tuesday, December 4, 2018 10:36 AM
To: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>; Tammy L. Morris <tmorris@nealharwell.com>
Cc: Vance Broemel <Vance.Broemel@ag.tn.gov>; Daniel P. Whitaker <Daniel.Whitaker@ag.tn.gov>; Emily Knight <Emily.Knight@ag.tn.gov>; David N. Dittmore <David.Dittmore@ag.tn.gov>

Subject: RE: Atmos filing

Karen: Atmos is working on this. The hope and plan is to have it done Thursday.

Scott Ross

Neal & Harwell, PLC
1201 Demonbreun Street, Suite 1000
Nashville, TN 37203
(615) 244-1713
sross@nealharwell.com
www.nealharwell.com

-----Original Message-----

From: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>
Sent: Tuesday, December 4, 2018 9:30 AM
To: Scott Ross <sross@nealharwell.com>; Tammy L. Morris <tmorris@nealharwell.com>
Cc: Vance Broemel <Vance.Broemel@ag.tn.gov>; Daniel P. Whitaker <Daniel.Whitaker@ag.tn.gov>; Emily Knight <Emily.Knight@ag.tn.gov>; David N. Dittmore <David.Dittmore@ag.tn.gov>
Subject: RE: Atmos filing

Good Morning Scott,

I am following up on the Consumer Advocate's request for clarification in its filing of November 21st. Specifically, we are requesting an update on the balance of the Protected and Unprotected excess ADIT.

Respectfully,
Karen

-----Original Message-----

From: Karen H. Stachowski
Sent: Wednesday, November 28, 2018 7:45 AM
To: 'Scott Ross' <sross@nealharwell.com>; 'Tammy L. Morris' <tmorris@nealharwell.com>
Cc: Vance Broemel <Vance.Broemel@ag.tn.gov>; Daniel P. Whitaker <Daniel.Whitaker@ag.tn.gov>; Emily Knight <Emily.Knight@ag.tn.gov>; David N. Dittmore <David.Dittmore@ag.tn.gov>
Subject: RE: Atmos filing

Scott,

I wanted to follow-up on my email from last week that I sent before the Thanksgiving Holiday. The email raised two issues: (1) the Excel version of the PDF filed last week and (2) update on the balance of the Protected and Unprotected excess ADIT.

We did receive the email from you providing the Excel version of the PDF document. Thank you for that email and the document. However, I haven't heard on the second item requesting an update of the balance of the Protected and Unprotected excess ADIT. Will Atmos be providing this information to the Consumer Advocate soon?

I hope you enjoyed your Thanksgiving Holiday and look forward to hearing from you soon.

Respectfully,
Karen

-----Original Message-----

From: Karen H. Stachowski
Sent: Wednesday, November 21, 2018 2:08 PM
To: 'Scott Ross' <sross@nealharwell.com>
Cc: Tammy L. Morris <tmorris@nealharwell.com>; sharla.dillon@tn.gov; Vance Broemel <Vance.Broemel@ag.tn.gov>; Daniel P. Whitaker <Daniel.Whitaker@ag.tn.gov>; Wayne Irvin <Wayne.Irvin@ag.tn.gov>; Emily Knight <Emily.Knight@ag.tn.gov>
Subject: RE: Atmos filing

Scott,

We've received the thumb drive, but it only has the PDF document on it.

Also, can Atmos provide and update on the balance of the Protected and Unprotected excess ADIT?

Thanks,

Karen H. Stachowski | Assistant Attorney General Consumer Protection and Advocate Division Office of the
Tennessee Attorney General UBS Building, 20th Floor
315 Deaderick Street, Nashville, Tennessee 37243 Mailing Address:
P.O. Box 20207, Nashville, Tennessee 37202 p. 615.741.2370 Karen.Stachowski@ag.tn.gov

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-----Original Message-----

From: Scott Ross <sross@nealharwell.com>
Sent: Wednesday, November 21, 2018 9:51 AM
To: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>
Cc: Tammy L. Morris <tmorris@nealharwell.com>; sharla.dillon@tn.gov; Vance Broemel <Vance.Broemel@ag.tn.gov>; Daniel P. Whitaker <Daniel.Whitaker@ag.tn.gov>; Wayne Irvin <Wayne.Irvin@ag.tn.gov>; Emily Knight <Emily.Knight@ag.tn.gov>
Subject: Re: Atmos filing

The excel file is on its way to you on a thumb drive.

Scott Ross
Neal & Harwell, PLC

On Nov 21, 2018, at 9:49 AM, Karen H. Stachowski
<Karen.Stachowski@ag.tn.gov<mailto:Karen.Stachowski@ag.tn.gov>> wrote:

Tammy and Scott,

We received the PDF attachment. Can you provide the attachment in Excel format?

Thanks,

Karen H. Stachowski | Assistant Attorney General Consumer Protection and Advocate Division Office of the
Tennessee Attorney General UBS Building, 20th Floor
315 Deaderick Street, Nashville, Tennessee 37243 Mailing Address:
P.O. Box 20207, Nashville, Tennessee 37202 p. 615.741.2370
Karen.Stachowski@ag.tn.gov<mailto:Karen.Stachowski@ag.tn.gov>

<image002.png>

Our Mission - We are the State's law office serving Tennessee with principled, independent, and excellent counsel.

From: Tammy L. Morris <tmorris@nealharwell.com<mailto:tmorris@nealharwell.com>>
Sent: Wednesday, November 21, 2018 9:18 AM
To: 'sharla.dillon@tn.gov<mailto:sharla.dillon@tn.gov>' <sharla.dillon@tn.gov<mailto:sharla.dillon@tn.gov>>
Cc: Vance Broemel <Vance.Broemel@ag.tn.gov<mailto:Vance.Broemel@ag.tn.gov>>; Daniel P. Whitaker
<Daniel.Whitaker@ag.tn.gov<mailto:Daniel.Whitaker@ag.tn.gov>>; Karen H. Stachowski
<Karen.Stachowski@ag.tn.gov<mailto:Karen.Stachowski@ag.tn.gov>>; Wayne Irvin
<Wayne.Irvin@ag.tn.gov<mailto:Wayne.Irvin@ag.tn.gov>>; Emily Knight
<Emily.Knight@ag.tn.gov<mailto:Emily.Knight@ag.tn.gov>>
Subject: Atmos filing

Attached is a copy of a letter from Scott Ross along with updated financials in PDF format for Atmos Energy for filing today. Please feel free to call if you have any questions.

Thanks,
Tammy

Tammy L. Morris
Legal Assistant
Neal & Harwell, PLC
1201 Demonbreun Street, Suite 1000
Nashville, Tennessee 37203
(615) 244-1713 - Ext. 1100
(615) 726-0573 - Fax
www.nealharwell.com<http://www.nealharwell.com/>
<image003.jpg>

<image004.png>

Employment Director, NALS...the association for legal professionals, Nashville Chapter