

Filed Electronically in TPUC Docket Room on 2/1/2019 at 1:54 p.m.

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February 1, 2019

Tory Lawless
Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, Fourth Floor
Nashville, TN 37242

VIA E-MAIL AND HAND DELIVERY

tpuc.docketroom@tn.gov

RE: Atmos Energy Corporation – 2019 ARM Filing
TPUC Docket No. 19- -00018

Dear Ms. Lawless:

Enclosed is Atmos Energy Corporation's 2019 ARM Forward-Looking Filing, consisting of the following:

- Two volumes of non-confidential material (original and four hard copies);
- One volume of confidential material (original and four hard copies), filed in a sealed envelope;
- A thumb drive containing the complete non-confidential portion of the filing, PDF format for posting to the website;
- A separate sealed envelope containing one thumb drive of confidential material and one thumb drive of the individual files making up the filing and linked model and relied upon files (confidential **and** non-confidential);

Best regards,

Sincerely,

A. Scott Ross

ASR:prd

Enclosures

Docket Manager
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cc: Consumer Advocate and Protection Division w/ Enclosures

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:

19-00018

PETITION OF ATMOS ENERGY CORPORATION)	
FOR APPROVAL OF ITS 2019 ANNUAL RATE)	Docket No. 19-XXXXX
REVIEW FILING PURSUANT TO TENN.)	
CODE ANN. § 65-5-103(d)(6))	

2019 ARM FORWARD-LOOKING FILING

Pursuant to the Annual Review Mechanism 'Tariff ("ARM") approved in Commission Docket No. 14-00146, Atmos Energy Corporation ("Atmos Energy" or the "Company") hereby respectfully makes its 2019 annual forward-looking filing. Atmos Energy submits herewith the following documents:

1. Certification
 - a. Attachment A: Deviations from Approved Methodologies
 - b. Attachment B: Added and Disabled Accounts/Subaccounts
2. Testimony of Gregory K. Waller
3. List of Dockets Utilizing Methodologies Originally Approved in Docket No. 14-00146
4. Revenue Requirement Schedules
 - a. Schedule 1: Cost of Service (and supporting workpapers)
 - b. Schedule 2: Summary of Revenue at Present Rates
 - c. Schedule 3: Cost of Gas (and supporting workpapers)
 - d. Schedule 4: Operation and Maintenance Expenses (and supporting workpapers)
 - e. Schedule 5: Taxes Other Than Income Taxes (and supporting workpapers)
 - f. Schedule 6: Depreciation and Amortization Expense (and supporting workpapers)
 - g. Schedule 7: Rate Base & Return (and supporting workpapers)
 - h. Schedule 8: State Excise & Income Taxes (and supporting workpapers)
 - i. Schedule 9: Overall Cost of Capital (and supporting workpapers)
 - j. Schedule 10: Rate of Return (and supporting workpapers)
 - k. Schedule 11-1: Proof of Revenues and Calculation of Rates, Historic Base Period Margin at Present Rates
 - l. Schedule 11-2: Proof of Revenues and Calculation of Rates, Forward Looking Test Year Margin at Present Rates
 - m. Schedule 11-3: Proof of Revenues and Calculation of Rates, Rate Design

- n. Schedule 11-4: Proof of Revenues and Calculation of Rates, Summary of Present and Proposed Rates.
- o. TPUC Staff Revenue Requirement Schedules

5. Relied Upons

- a. FY17 Blending percentages for Greenville and CKV Center Effective Oct-16
- b. FY18 Blending percentages for Greenville and CKV Center Effective Oct-17
- c. ADIT to Rates Oct 2018
- d. Cash Working Capital
- e. Depreciation
- f. Essbase Support Final FY18
- g. Ad Valorem Budget FY 2019
- h. FY18Composite Factors
- i. FY19Blending percentages for CKV Center, Greenville and Aligne Effective Oct-18
- j. FY19 Composite Factors
- k. Gas Storage Forecast 2018_Thru May 2020
- l. Income Statement
- m. Inflations Calculation
- n. Intercompany Lease Property FY18
- o. KMD FY19 CapEx Projected Budget
- p. KYMidStates CapSpend-Jul18
- q. O&M Summary Historic Year Sep 18
- r. O&M Summary Test Year-Budget FY19
- s. Plant Balances 2019 TN Case
- t. Reg Asset Tenn Calcs Thru 073114
- u. SSU FY19 CapEx Projected Budget
- v. SSU-Capspend-20Jul17
- w. Taxes Other FY19 Details 093DIV
- x. Taxes Other Historical
- y. TN SSU Asset Depreciation activity by month Sep-17 to Sep-18
- z. TN Depreciation Rates_09-2016
- aa. TN Office Leases 2019
- bb. TN-FYE2015-AcctAllocation
- cc. TRA Customer Deposits Interest Rate
- dd. Historic Base Period and Forward Looking Test Year Billing Determinants (Confidential)

6. Weather Normalization

- a. 30 Year Smoothed Normal Bristol Weather
- b. 30 Year Smoothed Normal Knoxville Weather
- c. 30 Year Smoothed Normal Nashville Weather
- d. 30 Year Smoothed Normal Paducah Weather

7. Tennessee Minimum Filing Requirement #38

8. Trial Balance

- 9. General Ledger
- 10. Variance Report
- 11. Proposed Tariff

WHEREFORE, Atmos Energy respectfully requests that the Commission approve the Annual ARM Filing and the Company's Proposed Tariff and supporting schedules.

Respectfully submitted,

NEAL & HARWELL, PLC

By: 

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Counsel for Atmos Energy Corporation

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 1st day of February, 2019.

<input type="checkbox"/> Hand	Wayne M. Irvin, Esq.
<input type="checkbox"/> Mail	Vance Broemel, Esq.
<input type="checkbox"/> Fax	Rachel Newton, Esq.
<input type="checkbox"/> Fed. Ex.	Office of the Attorney General
<input checked="" type="checkbox"/> E-Mail	Consumer Advocate and Protection Division
	P. O. Box 20207
	Nashville, TN 37202-0207



BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

IN RE:)
)
PETITION OF ATMOS ENERGY CORPORATION)
FOR APPROVAL OF ITS 2019 ANNUAL RATE) Docket No. 19-XXXXX
REVIEW FILING PURSUANT TO TENN.)
CODE ANN. § 65-5-103(d)(6))

CERTIFICATE

STATE OF TENNESSEE)

COUNTY OF WILLIAMSON)

I, J. Kevin Dobbs, being first duly sworn, state that I am the President, Kentucky Mid-States Division for Atmos Energy Corporation ("Atmos Energy" or "the Company"), that I am authorized to affirmatively represent and warrant, on behalf of Atmos Energy in the above referenced docket, upon information and belief formed after reasonable inquiry:

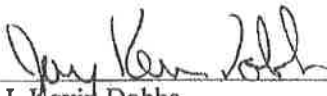
- (i) That the Company's Annual Review Mechanism ("ARM") Filing has been prepared in accordance with the Approved Methodologies, as defined and described in Section III. G. of the ARM Tariff (Atmos Energy Tariff Sheet No. 34.1) and Section 13(g-m) of the *Stipulation and Settlement Agreement* as approved by the Tennessee Public Utility Commission ("Commission") in Exhibit A of the *Order Approving Settlement* in Docket No. 14-00146 (the "Settlement Agreement") and subsequent Orders of the Commission in Dockets filed pursuant

to the Company's ARM tariff, with the exception of: 1) the deviations disclosed and described in Attachment A to this affidavit;

- (ii) That the Company does not have any New Matters, as defined in Section III. F. of the ARM Tariff (Atmos Energy Tariff Sheet No. 34.1);
- (iii) That the Variance Report, as defined in Section IX of the ARM Tariff (Atmos Energy Tariff Sheet No. 34.7), includes all matters that are required by the Settlement Agreement and any related Tennessee Public Utility Commission order to be disclosed in the Variance Report;
- (iv) That no Disallowed Items, as identified and described in Attachment H of the Settlement Agreement and modified by subsequent Orders of the Commission in Dockets filed pursuant to the Company's ARM tariff, have been included in the Company's ARM Filing;
- (v) That, except as expressly disclosed in Attachment B attached to this Certificate, Attachment B to the Certificate of previous forward looking Dockets filed pursuant to the Company's ARM tariff, and in Orders of the Commission in Dockets filed pursuant to the Company's ARM tariff, since the Effective Date of the Settlement Agreement there have been no additions, deletions, or modifications to the accounts or subaccounts used by the Company, as defined by Section 34 of the Settlement Agreement and as such accounts or subaccounts

were provided to the Tennessee Public Utility Commission and Consumer Advocate in the form of discovery and data request responses in Tennessee Public Utility Commission Docket No. 14-00146;

- (vi) That, except as referenced and described in the immediately preceding subsection (v) and in the testimony of Gregory K. Waller, there has been no change in the method of accounting or estimation in any account or subaccount since the Effective Date of the Settlement Agreement;
- (vii) That the budgeting and forecasting methodologies used as the basis for the forecasted cost of service in this Docket are consistent with those employed in Docket No. 14-00146 and underlie the Approved Methodologies as defined in section (i) above;
- (viii) That the cost of service items for which the Company seeks recovery, particularly but not limited to capital investments and operating expenses, have been prudently incurred and/or have been prudently forecasted to be incurred.


J. Kevin Dobbs

Sworn and subscribed before me this 30th day of JANUARY, 2019


Notary Public

My Commission Expires: MARCH 3, 2020



ATTACHMENT A

Deviations from Approved Methodologies

Removal of ADIT Items Not Reflected in Cost of Service

The adjustment removes ADIT items not reflected in cost of service as discussed in David Dittmore's testimony in Docket Nos. 18-00034 and 18-00097 and agreed to by Company witness Ms. Jennifer Story in her rebuttal testimony in Docket No. 18-00034. The ADIT items in question are for pension and incentive compensation (but do not include Director's Stock Award which is not a component of incentive compensation).

Calculation of Gross Up Factor Pertaining to Forfeited Discounts

Partially consistent with the recommendation of Mr. Hal Novak in his testimony in Docket No. 18-00097, total revenues is used as the denominator in calculating the portion of the gross up factor relating to forfeited discounts on workpaper 8.2. The calculation of the portion of the gross up factor relating to allowance for uncollectables remains unchanged and consistent with the Approved Methodologies.

ATTACHMENT B

Added and Disabled Accounts / Subaccounts

List of Added Accounts

Type of Account	Account/Sub Account Number	Account/Sub Account Description	Date Added	Balance Sheet or Income Statement	Company 30 or 50 (Yes/No)	Notes
Account	1019	NSC-Gas Plant In Service	2/20/18	Balance Sheet	Yes	(1)
Account	1069	NSC-Completed construction not classified	2/20/18	Balance Sheet	Yes	(1)
Account	1079	NSC-Construction work In progress	2/20/18	Balance Sheet	Yes	(1)
Account	1089	NSC-Accum Prov for Depreciation	2/20/18	Balance Sheet	Yes	(1)
Account	1350	Working funds	4/6/18	Balance Sheet	Yes	
Account	1829	NSC-Other Regulatory Assets	2/20/18	Balance Sheet	Yes	(1)
Account	1849	NSC-Cleaning Account	5/24/18	Balance Sheet	Yes	(1)
Account	2549	NSC-Other Regulatory Liabilities	11/13/18	Balance Sheet	Yes	(1)
Account	4039	NSC-Depreciation Expense	2/20/18	Income Statement	Yes	(1)
Account	4269	NSC-Expense	2/20/18	Income Statement	Yes	(1)
Account	9269	NSC-Employee pensions	3/9/18	Income Statement	Yes	(1)
Subaccount	01289	NSC-Amortization Expense	3/9/18	Income Statement	Yes	(2)
Subaccount	01294	NSC-OPEB Benefits Load	7/27/18	Income Statement	Yes	(2)
Subaccount	01295	NSC-OPEB Benefits Variance	2/20/18	Income Statement	Yes	(2)
Subaccount	01296	NSC-OPEB Benefits Projects	2/20/18	Income Statement	Yes	(2)
Subaccount	01297	NSC-Pension Benefits Load	2/20/18	Income Statement	Yes	(2)
Subaccount	01298	NSC-Pension Benefits Variance	2/20/18	Income Statement	Yes	(2)
Subaccount	01299	NSC-Pension Benefits Projects	2/20/18	Income Statement	Yes	(2)
Subaccount	05410	Misc - Nondeductible	4/17/18	Income Statement	Yes	
Subaccount	07492	NSC-NQ Retirement Cost	2/20/18	Income Statement	Yes	(2)
Subaccount	07493	NSC-SERP Capitalized	2/20/18	Income Statement	Yes	(2)
Subaccount	07496	Admin Fees Pension	11/6/18	Income Statement	Yes	
Subaccount	07497	Admin Fees SERP	11/6/18	Income Statement	Yes	
Subaccount	07613	NSC-Benefits Cap Accrual	2/20/18	Income Statement	Yes	(2)
Subaccount	10640	Chase 273559150-SAP CC collections	5/21/18	Balance Sheet	Yes	
Subaccount	10838	Inv CIBC IBDDA	7/27/18	Balance Sheet	Yes	
Subaccount	13408	SGR Accrual	3/4/18	Balance Sheet	No	
Subaccount	13409	SIR Accrual	3/4/18	Balance Sheet	No	
Subaccount	13539	GOOMM 4.300% due Oct-48	10/9/18	Balance Sheet	No	
Subaccount	13780	NSC Reg Asset/Usability	3/9/18	Balance Sheet	Yes	(2)
Subaccount	13781	GUD 10645 Dallas rate case expense	6/27/18	Balance Sheet	No	
Subaccount	13782	GUD 10580 - APT Rate case expense	9/6/18	Balance Sheet	No	
Subaccount	13783	Enviros RCE GUD 10742/10743	12/6/18	Balance Sheet	No	
Subaccount	16045	Perryville Gas Storage	2/14/18	Balance Sheet	No	
Subaccount	16046	Twin Eagle Resource 7394	4/16/18	Balance Sheet	No	
Subaccount	16047	Enstor Katy Storage	4/16/18	Balance Sheet	No	
Subaccount	16048	Questar Clay Basin	5/7/18	Balance Sheet	No	
Subaccount	16049	Jefferson AMD-311	5/16/18	Balance Sheet	Yes	
Subaccount	16050	Monroe Atmos S00414 S	5/16/18	Balance Sheet	Yes	
Subaccount	16051	TGT NNL 36789	5/17/18	Balance Sheet	No	
Subaccount	20210	4.30% Senior Notes due 2048	10/19/18	Balance Sheet	Yes	
Subaccount	20910	Reg Liability Gross Up 2017	1/16/18	Balance Sheet	No	
Subaccount	21308	Emp Lifelock Deductions	4/10/18	Balance Sheet	Yes	
Subaccount	26659	Int-4.300% Senior Notes due 2048	10/29/18	Balance Sheet	Yes	
Subaccount	27793	Long Term Payable-Federal	1/16/18	Balance Sheet	Yes	
Subaccount	27794	ARI Incentive	9/26/18	Balance Sheet	Yes	
Subaccount	27909	Reg Liability 2017	1/16/18	Balance Sheet	Yes	
Subaccount	27910	Cost of Service Reserve	1/31/18	Balance Sheet	Yes	
Subaccount	27911	Interest-Cost of Service Reserve	3/1/18	Balance Sheet	Yes	
Subaccount	29022	Bad Debt Gas Cost Interest	1/30/18	Balance Sheet	No	
Subaccount	30026	NSC-Reg Asset Amortization	3/9/18	Balance Sheet	Yes	(2)
Subaccount	30027	Rate Case Expenses - GUD 10604	9/6/18	Balance Sheet	No	
Subaccount	30178	Interest-Cost of Service Reserve	3/6/18	Balance Sheet	No	
Subaccount	30179	4.300 Senior Notes disc	11/6/18	Balance Sheet	Yes	
Subaccount	30207	AMT Federal Tax Expense	1/19/18	Balance Sheet	Yes	
Subaccount	30208	Amortization of Excess Deferred	7/18/18	Balance Sheet	Yes	
Subaccount	30626	BNP IBDDA	1/5/18	Balance Sheet	Yes	
Subaccount	30627	CIBC IBDDA	8/16/18	Balance Sheet	Yes	
Subaccount	30946	LTD 4.300% Sr Notes due 2048	10/29/18	Balance Sheet	Yes	
Subaccount	31379	Cost of Service Reserve	1/31/18	Balance Sheet	No	
Subaccount	31380	COS refund Residential	4/19/18	Balance Sheet	No	
Subaccount	31381	COS refund Commercial	4/19/18	Balance Sheet	No	
Subaccount	31382	COS refund Industrial	4/19/18	Balance Sheet	No	
Subaccount	31383	COS refund Irrigation	4/19/18	Balance Sheet	No	
Subaccount	31384	COS refund Public Auth	4/19/18	Balance Sheet	No	
Subaccount	31385	COS refund Transportation	4/19/18	Balance Sheet	No	
Subaccount	31386	COS refund Unbilled	4/20/18	Balance Sheet	No	

Note (1) These accounts were created solely to comply with the FASB issued ASU No. 2017-07, Improving the Presentation of Net Periodic Pension Cost and Net Periodic Postretirement Benefit Cost. These accounts are used in the Company's GAAP reporting to correctly present pension and OPEB cost per ASU No. 2017-07. The Company's regulatory reporting does not include these accounts and continues to present using the old method as acceptable under FERC guidance.

Note (2) These subaccounts were created to break out the non-service cost component of pension and OPEB costs.

List of Disabled Accounts					
Type of Account	Account/Sub Account Number	Account/Sub Account Description	Date Disabled	Balance Sheet or Income Statement	Company 10 or 50 (Yes/No)
Subaccount	10605	(Closed) Tunica-Planters Bank	5/21/18	Balance Sheet	No
Subaccount	10611	(Closed) West Point-Bank Of Mississippi	5/21/18	Balance Sheet	No
Subaccount	10616	(Closed) Gen Plt Disposal	5/21/18	Balance Sheet	No
Subaccount	10617	(Closed) Vehicle Proceeds	5/21/18	Balance Sheet	No
Subaccount	10620	(Closed) Insur Draft Clsr	5/21/18	Balance Sheet	No
Subaccount	10622	(Closed) Remittance Lawrenceburg 1020609	5/21/18	Balance Sheet	Yes
Subaccount	10624	(Closed) Cash-Miss Energies, Inc.# 3752069642	5/21/18	Balance Sheet	Yes
Subaccount	10625	(Closed) Cash-Miss Water, Inc.# 3751986441	5/21/18	Balance Sheet	No
Subaccount	10637	(Closed) Cash-JPM Chase 630744787	5/21/18	Balance Sheet	Yes
Subaccount	11347	Employee Merchandise-Payroll Deduction	5/21/18	Balance Sheet	Yes
Subaccount	13205	Ppd - ARI 6 year contract extension	11/12/18	Balance Sheet	Yes
Subaccount	14025	Co Rate Case	1/25/18	Balance Sheet	No
Subaccount	14221	Myriant Lease Rec	11/28/18	Balance Sheet	No
Subaccount	15977	Gulf South-ISS	5/24/18	Balance Sheet	No
Subaccount	16003	Gulf South-Woodward (NOPSIS)	5/24/18	Balance Sheet	No
Subaccount	16008	Gulf South Storage FSS	5/24/18	Balance Sheet	No
Subaccount	20000	Accumulated Other Comprehensive Income	11/30/18	Balance Sheet	Yes
Subaccount	21032	Empr Esop-Other Exp	8/24/18	Balance Sheet	Yes
Subaccount	21170	Emp GYUL Investment Fund	4/23/18	Balance Sheet	Yes
Subaccount	26915	Never Used	1/5/18	Balance Sheet	No
Subaccount	27339	Inc Tax Pay Future Rates	6/6/18	Balance Sheet	Yes
Subaccount	35105	Genl Feed Adjustment	5/16/18	Balance Sheet	Yes
Subaccount	90003	Woodward	2/20/18	Balance Sheet	No