

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

**IN RE:**

**ATMOS ENERGY CORPORATION  
FOR APPROVAL OF ITS 2019 ANNUAL RATE  
REVIEW FILING PURSUANT TO TENN.  
CODE ANN. § 65-5-103(d)(6)**

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**DOCKET NO. 19-00018**

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**CONSUMER ADVOCATE'S SUPPLEMENTAL TO  
SECOND DISCOVERY REQUEST  
TO ATMOS ENERGY CORPORATION**

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This Supplemental to Second Discovery Request is hereby served upon Atmos Energy Corporation (Company or Atmos Energy), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Advocate Unit in the Financial Division of the Attorney General's Office (Consumer Advocate) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The

responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Unit in the Financial Division, 301 6<sup>th</sup> Avenue North, Nashville, Tennessee 37243, c/o Karen H. Stachowski, on or before 2:00 p.m. (CDT), March 22, 2019.

### **PRELIMINARY MATTERS AND DEFINITIONS**

These additional discovery requests incorporate the same Preliminary Matters and Definitions set forth in the First Discovery Request of the Consumer Advocate served on the Company and counsel to the Company on February 22, 2019, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by Atmos Energy and any Atmos Energy affiliate which would make a prior response inaccurate, incomplete, or incorrect.

### **SUPPLEMENTAL SECOND DISCOVERY REQUESTS**


2-12. Refer to the Attachment provided in response to CPAD 1-3 in this Docket. Does the balance of the Company's forecasted ADIT found within the balances included in WP 7-1 include book/tax timing differences for the following items:

- (a) Pension Expense?
- (b) Restricted Stock Program?
- (c) Restricted Stock – MIP?
- (d) MIP/VPP accrual?

If so, please provide these monthly book/tax timing differences incorporated into the ADIT forecast. If not, explain why such timing differences are not incorporated into the forecast.

**RESPONSE:**

RESPECTFULLY SUBMITTED,

  
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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:

A. Scott Ross, Esq.  
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This the 15<sup>th</sup> day of March, 2019.

  
KAREN H. STACHOWSKI  
Assistant Attorney General