

From: [David Foster](#)
To: [Ectory R. Lawless](#)
Cc: [Joe Shirley](#); [Darlene Standley](#); [Pat Murphy](#); [Michelle Mairs](#)
Subject: Data request for Docket No. 19-00076
Date: Thursday, May 7, 2020 4:21:01 PM

Tori, please file this data request in Docket No. 19-00076.

thanks

From: David Foster
Sent: Thursday, May 7, 2020 4:18 PM
To: Scott Ross <sross@nealharwell.com>
Cc: Karen H. Stachowski <Karen.Stachowski@ag.tn.gov>; 'Mark.Martin@atmosenergy.com' <Mark.Martin@atmosenergy.com>; Jennifer.Story@atmosenergy.com <Jennifer.Story@atmosenergy.com>; Hal Novak <halnovak@whnconsulting.com>
Subject: Data request for Docket No. 19-00076

Scott,

In order to move this docket forward to hearing, please provide answers to the following Staff questions:

1. Does the Variable Rate Premium (VRP) apply only to underfunded vested amounts? If not, please list the specific circumstances requiring payment of the VRP and provide the source for your position.
2. Does the VRP have to be paid in addition to any actual contributions to the pension plan?
3. On page 6 of Jennifer Story's Rebuttal Testimony, she states that if the Company had made no contribution to the pension fund, it would have had a \$330,000 VRP requirement in 2019 and a projected VRP requirement in 2020 of over \$1,000,000. Please provide the underlying assumptions, supporting workpapers and calculations for these amounts.

It is requested that responses be filed no later than 2:00 p.m. on Wednesday, May 13, 2020. Should you have any questions or need clarification, please contact me via email or my cell phone at (615) 308-8429.

David