

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

IN RE:

ATMOS ENERGY CORPORATION)	
ANNUAL RECONCILIATION)	DOCKET NO. 19-00076
OF ANNUAL REVIEW MECHANISM)	

RESPONSE OF ATMOS ENERGY CORPORATION TO DATA REQUEST
OF THE TENNESSEE PUBLIC UTILITY COMMISSION

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.

RESPONSE:

Yes. "...the variable-rate premium for a single-employer plan is equal to a specified dollar amount for each \$1,000 (or fraction thereof) *of the plan's unfunded vested benefits* as determined under § 4006.4 for the UVB valuation year." 29 C.F.R. §4006.3(b)(1) (emphasis added).

Unfunded vested benefits is the amount by which the value of nonforfeitable benefits under the plan exceeds the value of the assets of the plan. 29 C.F.R. §4211.2.

Also, see generally 29 C.F.R. §4006.4 – Determination of unfunded vested benefits.

2. Does the VRP have to be paid in addition to any actual contributions to the pension plan?

RESPONSE:

Yes. The Company would note that actual contributions to the pension plan during the UVB valuation year affect the calculation of unfunded vested benefits which in turn affect the calculation of VRP for the premium payment year.


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.

RESPONSE:

Please see the confidential attached supporting workpaper from Willis Towers Watson showing the assumptions and calculations for the referenced amounts from Jennifer Story's Rebuttal Testimony.

Respectfully submitted,

NEAL & HARWELL, PLC

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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 13th day of May, 2020.

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