

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

IN RE:

**PETITION OF ATMOS ENERGY)
CORPORATION FOR APPROVAL)
OF ITS 2022 ANNUAL RATE) DOCKET NO. 22-00010
REVIEW FILING PURSUANT TO)
TENN. CODE ANN. § 65-5-103(d)(6))**

**PRE-FILED TESTIMONY OF WILLIAM D. MATTHEWS
ON BEHALF OF ATMOS ENERGY CORPORATION**

I. INTRODUCTION OF WITNESS

Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

A. My name is William D. Matthews. I am Manager, Rates and Regulatory Affairs with Atmos Energy Corporation (“Atmos Energy” or “Company”). My business address is 5420 LBJ Freeway, Ste. 1600, Dallas, Texas 75240.

Q. PLEASE STATE YOUR EDUCATION AND PROFESSIONAL BACKGROUND.

A. I hold undergraduate degrees in accounting and finance from Texas A & M University. I started my career with Atmos Energy in 2005 as a Business Planning Analyst. As a Business Planning Analyst, and positions of increasing responsibility within Business Planning & Analysis, I have worked on the annual planning process focusing on customer analysis, integrating upcoming filings within the Company's operating plan and performed various special analysis and projects for the Vice President of Strategic Planning. I was named Manager of Rates and Regulatory Affairs in October 2020.

1 **Q. WHAT ARE YOUR RESPONSIBILITIES AT ATMOS ENERGY?**

2 A. I am currently responsible for managing rate proceedings primarily filed with state
3 regulatory bodies on behalf of the Company. My responsibilities include execution
4 of applications for changes to rates and tariffs as part of traditional rate cases, tariff
5 language change proposals, and annual rate making mechanisms that the Company
6 files in the eight states in which it has regulated operations.

7 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS OR ANY OTHER**
8 **REGULATORY COMMISSION?**

9 A. Yes, I filed before this Commission testimony in Docket No. 21-00019.

10 **II. PURPOSE OF TESTIMONY**

11 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

12 A. The purpose of my testimony is to calculate the Company's annual revenue
13 requirement for the Historic Test Period ending September 30, 2021, as prescribed
14 in Section IV of the Company's Annual Review Mechanism ("ARM") tariff. The
15 resulting revenue requirement establishes the amount of revenue required for the
16 Company to earn its authorized return on equity for the Historic Test Period ending
17 September 30, 2021, in accordance with the approved methodologies ("Approved
18 Methodologies") as defined in the Company's approved ARM tariff.¹ Based upon
19 the established revenue requirement, the Company's rates will be increased or
20 decreased, as appropriate.

¹ *In re: Petition of Atmos Energy Corporation for a General Rate Increase Under T.C.A. 65-5-103(a) and Adoption of an Annual Rate Review Mechanism Under T.C.A. 65-5-103(d)(6), Docket No. 14-00146, Order Approving Settlement*, p. 10 (November 4, 2015); *see also In re: Docket to Investigate and Consider Modifications to Atmos Energy Corporation's Annual Rate Review Mechanism Under Tenn. Code Ann. § 65-5-103(d)(6), Docket No. 18-00112, Order Approving Stipulation and Settlement Agreement*, p. 10 (December 16, 2019).

1 **Q. DO YOU HAVE ANY EXHIBITS ATTACHED TO YOUR TESTIMONY?**

2 A. No. While I have no exhibits attached directly to my testimony, I am sponsoring
3 the revenue requirement schedules, workpapers, and other contents of the
4 Company's ARM Filing required by Section IV of the ARM tariff.

5 **Q. WERE THE CONTENTS OF THE ARM FILING PREPARED BY YOU OR**
6 **UNDER YOUR DIRECTION AND SUPERVISION?**

7 A. Yes.

8 **Q. WHAT CALCULATIONS HAVE YOU PERFORMED FOR YOUR**
9 **TESTIMONY IN THIS PROCEEDING?**

10 A. I have calculated the Company's cost of service, or revenue requirement, for the
11 Historic Test Period ended September 30, 2021, that is needed for the Company to
12 earn its authorized return on equity. I have also calculated the Annual
13 Reconciliation Revenue Requirement ("ARRR") for the Historic Test Period. The
14 results and supporting calculations are shown in the Revenue Requirement Model,
15 Schedules 1-11. All of the calculations were made in accordance with the Approved
16 Methodologies with the listed deviations disclosed as required on Attachment A in
17 the ARM certificate and also discussed below in my testimony.

18 **Q. PLEASE SUMMARIZE YOUR RESULTS.**

19 A. The Company's total cost of service for the Historic Test Period ended September
20 30, 2021 is \$146,363,004. The Company's revenue at present rates utilizing current
21 tariff rates, and actual historical billing determinants normalized for weather is
22 \$141,610,603, resulting in a revenue deficiency for the Historic Test Period ending
23 September 30, 2021 of \$4,752,401. The ARRR comparing actual cost of service

1 excluding gas cost from the historic test period with actual gross margin from the
2 same period results in a revenue deficiency of \$5,022,527. In calculating the Total
3 Revenue Deficiency (Sufficiency) I have included an expense credit of \$6,112,798
4 for the amortization of excess deferred income tax.² The resulting total revenue
5 deficiency is \$3,662,160. I have included in the ARM filing proposed tariffs with
6 proposed rates that produce that amount of revenue and that were calculated using
7 the Approved Methodologies.

8 **III. HISTORY AND PURPOSE OF THE ANNUAL REVIEW MECHANISM**

9 **Q. PLEASE EXPLAIN THE PURPOSE OF THE COMPANY'S ANNUAL** 10 **REVIEW MECHANISM.**

11 A. The ARM is designed to provide the Company a reasonable and timely means of
12 recovering its cost of service for each Historic Test Period. The ARM is a
13 comprehensive mechanism that includes all components of cost of service. This
14 includes, among other things, capital investment and depreciation expense, O&M
15 expenses, and revenues as detailed in the Revenue Requirement Model. The ARM,
16 created pursuant to Tennessee Code Annotated Section 65-5-103(d)(6), is a
17 reasonable and effective solution that allows the Company timely recovery of its
18 cost of service while avoiding costly and litigious general rate cases. In approving
19 the ARM in November 2015³ and modified single-filing ARM in December 2019,

² *In accordance with terms of Stipulation and Agreement filed on November 4, 2020 In re; Tennessee Public Utility Commission Investigation of Impacts of Federal Tax Reform on the Public Utility Revenue Requirements*, Docket No. 18-00034.

³ *In re: Petition of Atmos Energy Corporation for a General Rate Increase Under T.C.A. 65-5-103(a) and Adoption of an Annual Rate Review Mechanism Under T.C.A. 65-5-103(d)(6)*, Docket No. 14-00146, *Order Approving Settlement*, p. 10 (November 4, 2015).

1 the Commission found the mechanism to be in the public interest.⁴

2 **Q. WHEN AND HOW WAS THE ANNUAL REVIEW MECHANISM**
3 **APPROVED BY THE COMMISSION?**

4 A. The ARM was initially approved by the Commission in Docket No. 14-00146 by
5 Order issued on November 4, 2015.⁵ The modified approach to account for a
6 single-filing ARM was approved by the Commission in Docket No. 18-00112 by
7 Order issued on December 16, 2019.⁶

8 **Q. PLEASE PROVIDE A GENERAL DESCRIPTION OF THE ANNUAL**
9 **REVIEW MECHANISM AND HOW IT WORKS.**

10 A. Under the ARM, as set forth in the Company's Tariff Sheets 34.1 through 34.7 and
11 the schedules thereto, the Company calculates an annual revenue requirement for
12 its Tennessee jurisdiction for each Historic Test Period and then allocates that
13 revenue requirement across the Company's customer classes using Approved
14 Methodologies established in the Company's most recent rate case. The annual
15 filing serves two main functions: (1) it determines the ARRR by comparing actual
16 cost of service excluding gas cost from the Historic Test Period just completed with
17 actual adjusted gross margin from the same period; and (2) it determines the
18 Company's revenue requirement and the rates necessary to allow the Company to

⁴ *In re: Docket to Investigate and Consider Modifications to Atmos Energy Corporation's Annual Rate Review Mechanism Under Tenn. Code Ann. § 65-5-103(d)(6), Docket No. 18-00112, Order Approving Stipulation and Settlement Agreement*, p. 10 (December 16, 2019).

⁵ *See also In re: Petition of Atmos Energy Corporation for a General Rate Increase Under T.C.A. 65-5-103(a) and Adoption of an Annual Rate Review Mechanism Under T.C.A. 65-5-103(d)(6), Docket No. 14-00146, Order Approving Settlement*, p. 10 (November 4, 2015).

⁶ *In re: Docket to Investigate and Consider Modifications to Atmos Energy Corporation's Annual Rate Review Mechanism Under Tenn. Code Ann. § 65-5-103(d)(6), Docket No. 18-00112, Order Approving Stipulation and Settlement Agreement*, p. 10 (December 16, 2019).

1 earn its authorized return on equity for the same Historic Test Period.

2 Through the annual ARM filing, which is filed no later than February 1 of
3 each year, the Company updates both the customer and volumetric charges of its
4 base rates in accordance with the Approved Methodologies to reflect the revenue
5 requirement.

6 **Q. WERE ANY ADJUSTMENTS MADE DUE TO IMPACTS OF THE**
7 **CORONAVIRUS?**

8 A. No, because of the comprehensive nature of the ARM, no adjustments were
9 required to “normalize” results for the Historic Test Period regarding the impacts
10 of the Coronavirus.

11 **IV. REVENUE REQUIREMENT MODEL SCHEDULES**

12 **Q. PLEASE LIST THE SCHEDULES THAT COMPRISE THE COMPANY’S**
13 **REVENUE REQUIREMENT MODEL.**

14 A. The Revenue Requirement Model is comprised of:

15 Schedule 1: Cost of Service

16 Schedule 2: Summary of Actual Revenues for the Historic Test Period

17 Schedule 3: Cost of Gas

18 Schedule 4: Operation and Maintenance Expenses

19 Schedule 5: Taxes Other than Income

20 Schedule 6: Depreciation and Amortization Expenses

21 Schedule 7: Rate Base and Return

22 Schedule 8: Computation of State Excise and Income Taxes

23 Schedule 9: Overall Cost of Capital

1 Schedule 10: Rate of Return

2 Schedule 11: Proof of Revenues and Calculation of Rates

3 These Schedules are included in each February 1 ARM filing per the approved
4 ARM tariff. Pursuant to the ARM tariff, I have also included the schedules
5 traditionally used by Commission Staff to illustrate that the Company's Revenue
6 Requirement Model and Staff's model reconcile.

7 **Q. PLEASE EXPLAIN SCHEDULE 1.**

8 A. Schedule 1 summarizes the elements of the cost of service, including gas cost
9 expense, O&M expense, depreciation expense, taxes other than income taxes,
10 return on rate base, income tax, allowance for funds used during construction
11 ("AFUDC") and interest on customer deposits. Schedule 1 compares the total cost
12 of service to revenue at present rates in order to calculate a net revenue
13 deficiency/sufficiency. Additionally, Schedule 1 includes the ARRR and calculates
14 the net adjustment necessary to be implemented during the Rate Effective Year
15 (defined as the twelve months beginning June 1 of the year following the end of the
16 Historic Test Period). Schedule 1R calculates the cost of service and is used to
17 determine the ARRR.

18 **Q. PLEASE EXPLAIN SCHEDULES 2 AND 3.**

19 A. Schedule 2 shows per book revenues for the Historic Test Period ended September
20 30, 2021. Schedule 3 shows the Historic Test Period per books gas cost. The
21 Historic Test Period cost of gas is adjusted to remove rent for inter-company leased
22 storage property that is booked to gas cost per the Approved Methodologies.

1 **Q. DID YOU MAKE ANY ADJUSTMENTS TO ACCOUNT FOR PREVIOUS**
2 **ARRR AMOUNTS?**

3 A. Yes. Schedule 2 contains adjustments to remove portions of previous ARRR
4 revenue deficiencies approved in Dockets No. 19-00076 and No. 21-00019 that
5 related to the Historic Test Period.⁷ Those dockets adjusted rates based on revenue
6 deficiencies of \$713,614 and \$4,264,868 respectively.⁸

7 **Q. IS THIS THE FIRST ARM THAT REFLECTS THE FULL TRANSITION**
8 **FROM A FORWARD LOOKING TEST PERIOD TO HISTORICAL TEST**
9 **PERIOD, THUS REQUIRING AN UPDATED CALCULATION TO**
10 **REFLECT THE REMOVAL OF THE ARRR REVENUE FROM TWO**
11 **DIFFERENT ARM FILINGS?**

12 A. Yes. The Historic Rate Period and the Rate Effective Period are no longer
13 synchronized therefore ARRR revenues collected during the Historic Test Period,
14 should be removed.

15 **Q. HOW DID YOU DETERMINE HOW MUCH FROM EACH PERIOD TO**
16 **REMOVE?**

17 A. The portion of each of the previous two ARRR deficiencies should be removed in
18 the same ratio as how revenues in total are collected for the two periods of October
19 through May (Docket No. 19-00076) and June through September (Docket No. 21-

⁷ *In Re: Atmos Energy Corporation – 2019 ARM Reconciliation Filing*, Docket No. 19-00076, *Order Approving Revised Petition*, p. 10 (August 25, 2020); *In re: Petition of Atmos Energy Corporation for Approval of its 2021 Annual Rate Review Filing Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)*, Docket No. 21-00019, *Order Approving Stipulation and Settlement Agreement* (July 19, 2021).

⁸ *In Re: Atmos Energy Corporation – 2019 ARM Reconciliation Filing*, Docket No. 19-00076, *Order Approving Revised Petition*, p. 10 (August 25, 2020); *In re: Petition of Atmos Energy Corporation for Approval of its 2021 Annual Rate Review Filing Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)*, Docket No. 21-00019, *Order Approving Stipulation and Settlement Agreement* (July 19, 2021).

00019) when each of the amounts were implemented within rates. The calculations used to make this adjustment have been included on a separate schedule in the Company's trial balance relied upon file.

Q. IS THE ADDITIONAL WORKPAPER AND CALCULATION A CHANGE IN METHODOLOGY THAT REQUIRES APPROVAL?

A. Yes. The Company believes the calculation in this filing to synchronize the removal of ARRR revenues with the rate effective period is necessary but is a different calculation therefore is disclosing and requesting approval for the new calculation. I would note that our proposed calculation does align with the definition for ARRR (Page 34.2) which contemplates the removal of ARRR revenue from the revenue requirement calculation but is a more accurate calculation that reflects the ARRR revenue during the Historic Test Period. If approved this will be the methodology utilized in future ARRR calculations.

Q. DID YOU MAKE ANY OTHER ADJUSTMENTS TO REVENUES ON SCHEDULE 2?

A. Yes. The Company also made a new adjustment to add back Excess Deferred Income Taxes Liability ("EDITL") returned to customers during the Historic Test Period.⁹ This is also a change in methodology that is being disclosed for approval and if approved will be used in future ARM filings.

⁹ See *In re: Response of Atmos Energy Corporation to the Commission's Order Opening an Investigation and Requiring Deferred Accounting*, Docket No. 18-00034, *Order Approving November 2020 Stipulation and Settlement Agreement* (April 22, 2021); see also *In re: Petition of Atmos Energy Corporation for Approval of its 2021 Annual Rate Review Filing Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)*, Docket No. 21-00019, *Order Approving Stipulation and Settlement Agreement* (July 19, 2021).

1 **Q. PLEASE EXPLAIN WHY YOU MADE THIS NEW ADJUSTMENT.**

2 A. The EDITL returned to customers reduces revenues and without having an offset
3 in cost of service. In order to properly calculate the ARRR, the impact to revenues
4 of the EDITL returned must be added back to the per books revenues of the
5 Company. The calculations used to make this adjustment can also be found on a
6 separate schedule in the Company's trial balance relied upon file.

7 **Q. PLEASE EXPLAIN SCHEDULE 4.**

8 A. Schedule 4 shows the Historic Test Period per books O&M expense with
9 adjustments made in accordance with the Approved Methodologies, including an
10 adjustment to the Historic Test Period O&M expense to include operating expenses
11 for the Barnsley storage asset. The Historic Test Period O&M also includes the
12 removal of specified subaccounts, most notably related to the pension accrual and
13 incentive compensation, per the Approved Methodologies. The items disallowed
14 for ratemaking purposes are itemized on WP 4-1.

15 **Q. PLEASE EXPLAIN THE ADJUSTMENT IN O&M EXPENDITURES FOR**
16 **PENSION CONTRIBUTION.**

17 A. As required by the Approved Methodologies, the Company removed the actual FAS
18 87 expenses, including SERP. In years when the Company makes actual cash
19 contributions to its pension fund, the allocable amount will be included in the ARM
20 filing. For this Historic Test Period in this filing, the Company made an actual cash
21 contribution to its pension fund, and therefore the allocable amount is \$509,581.

1 **Q. DID YOU MAKE ANY ADJUSTMENTS FOR THE AMORTIZATION OF**
2 **RATE CASE EXPENSE?**

3 A. No. Actually-incurred rate case expenses for Docket No. 14-00146 were \$260,222.
4 The Company amortized that expense at \$14,583.33 per month and the amortization
5 was completed in November 2016. Therefore, no amounts are included in this
6 filing.

7 **Q. PLEASE EXPLAIN SCHEDULE 5.**

8 A. Schedule 5 shows Historic Test Period per books taxes other than income taxes and
9 includes ratemaking adjustments consistent with the Approved Methodologies.

10 **Q. PLEASE EXPLAIN SCHEDULE 6.**

11 A. Schedule 6 shows the Historic Test Period per books depreciation and amortization
12 expense. Schedule 6 includes ratemaking adjustments to reflect end of Historic
13 Test Period plant levels, and those consistent with the Approved Methodologies. I
14 adjusted the Historic Test Period depreciation expense to include expense for
15 intercompany leased storage property per the Approved Methodologies, as well as
16 to adjust for the removal of depreciation expense on capitalized incentive
17 compensation.

18 **Q. PLEASE EXPLAIN SCHEDULE 7.**

19 A. Schedule 7 shows the calculation of the Historic Test Period rate base in accordance
20 with the provisions of the ARM Tariff. The rate base includes the Regulatory Asset
21 and ratemaking adjustments consistent with the Approved Methodologies.
22 Schedule 7R calculates the historic average rate base for use in the calculation of
23 the ARRR.

1 **Q. WHAT ADJUSTMENTS ARE MADE TO THE HISTORIC TEST PERIOD**
2 **RATE BASE?**

3 A. The Company has followed all Approved Methodologies in making adjustments to
4 the Historic Test Period rate base, with an exception being made for ADIT on
5 workpaper 7-2. Also consistent with prior ARM filings, Schedule 7 also includes
6 adjustments for cash working capital and the net book value of inter-company
7 leased storage property. The revenue and expense lag factors from the Company's
8 lead/lag study prepared in Docket No. 14-00146 were applied to actual results in
9 order to calculate the Company's actual cash working capital requirement
10 consistent with the Approved Methodologies. In Schedule 7R, I have also made
11 the adjustment to the original cost of plant to incorporate the historic average of the
12 Regulatory Asset shown on Workpaper 7-10.

13 **Q. PLEASE DESCRIBE THE EXCEPTION TO METHODOLOGY MADE IN**
14 **THE CALCULATION OF ADIT.**

15 A. As discussed in more detail below, Winter Storm Uri resulted in extraordinary gas
16 costs being incurred in the month of February 2021. These gas purchases resulted
17 in a significant increase to the Company's deferred tax asset related to its net
18 operating loss. Because these gas costs are not related to Tennessee, the Company
19 has removed the impact of Winter Storm Uri from the net operating loss.

20 **Q. PLEASE DISCUSS WORKPAPER 7-9.**

21 A. Workpaper 7-9 contains the adjustment for Excess Deferred Income Taxes
22 ("EDIT"). The adjustment for EDIT includes additional amortization as reflected
23 in the Settlement Agreement filed November 3, 2020 in Docket No. 18-00034

1 Tennessee Public Utility Commission Investigation of Impacts of Federal Tax
2 Reform on the Public Utility Revenue Requirements. This adjustment was also
3 included and approved in the Company's filing in Case No. 21-00019.

4 **Q. PLEASE EXPLAIN SCHEDULE 8.**

5 A. Schedule 8 shows the calculation of state excise taxes and income taxes on the
6 required return on rate base for the Historic Test Period. Schedule 8R calculates
7 state excise taxes and income taxes on the required return for use in the calculation
8 of the ARRR.

9 **Q. PLEASE EXPLAIN SCHEDULE 9.**

10 A. Schedule 9 shows the calculation of the overall cost of capital based on the capital
11 structure, debt cost rates, and the required rate of return on equity required for the
12 Historic Test Period. It is comprised of the actual equity balance and actual long-
13 term debt balance as of September 30, 2021, and a twelve-month average short-
14 term debt balance for the twelve months ending September 30, 2021. The
15 authorized return on equity is 9.80% and the actual cost of debt is calculated on WP
16 9-2 and WP 9-3 of the filing, per the Approved Methodologies. Schedule 9R
17 calculates overall cost of capital for use in the calculation of the ARRR.

18 **Q. IS THE COMPANY'S CAPITAL STRUCTURE PREPARED IN**
19 **ACCORDANCE WITH THE APPROVED METHODOLOGIES?**

20 A. No. The Company has included an adjustment to remove \$2.2 billion of debt
21 associated with Winter Storm Uri. The debt was issued in response to extraordinary
22 gas costs incurred during the winter storm and we anticipate that the majority of
23 this debt will be securitized, in accordance with legislation in Texas and Kansas

1 during fiscal year 2022. The Company believes that it is appropriate to exclude this
2 debt, as well as the impact of Winter Storm Uri on the Company's deferred income
3 taxes because the winter storm did not have the extraordinary impact on gas costs.

4 **Q. WILL THE DEVIATION OF METHODOLOGY ALSO APPLY TO THE**
5 **FISCAL YEAR 2022 FILING?**

6 A. Yes. As stated in the previous response, the Company currently anticipates that this
7 debt will be refinanced prior to the end of this fiscal year. Thus a similar adjustment
8 to ADIT and capital structure will be required in next year's filing as well.

9 **Q. PLEASE EXPLAIN SCHEDULE 10.**

10 A. Schedule 10 shows the calculation of a rate of return on rate base and a rate of return
11 on the equity financed portion of rate base for the Historic Test Period, adjusted
12 with costs and revenues as presented in Schedules 2 through 9, per the Approved
13 Methodologies. Schedule 10R presents the calculation of a rate of return on rate
14 base and a rate of return on the equity-financed portion of rate base for use in the
15 calculation of the ARRR.

16 **Q. PLEASE EXPLAIN SCHEDULE 11.**

17 A. Schedule 11 presents the calculation of new tariff rates by customer class and rate
18 schedule for the Rate Effective Year (defined as the twelve months beginning June
19 1 of the year following the end of the Historic Test Period) consistent with the cost
20 of service and net revenue deficiency presented in Schedule 1 (including the
21 ARRR). The revenue requirement also includes the amortization of the excess
22 deferred income tax liability and the ARRR discussed hereinabove and referenced
23 on Schedule 1. The net revenue requirement (comprised of the deficiency for the

1 Historic Test Period ending September 30, 2021 plus the ARRR minus the
2 amortization of the excess deferred tax liability) is distributed across the billing
3 determinants (customer classes and rate schedules) in this filing, consistent with the
4 ARM tariff and Approved Methodologies.

5 **Q. HAVE THE COST OF SERVICE ITEMS FOR WHICH THE COMPANY**
6 **SEEKS RECOVERY BEEN PRUDENTLY INCURRED?**

7 A. Yes. The methodologies used as the basis for the cost of service in this filing are
8 consistent with those documented in Company witness Greg Waller's pre-filed
9 direct testimony in Docket No. 14-00146. These are the same methodologies,
10 policies and procedures that are the basis for the Approved Methodologies as
11 defined by the ARM tariff. The cost of service items for which the Company seeks
12 recovery, particularly but not limited to capital investments and operating expenses,
13 have been prudently incurred.

14 **V. CONCLUSION**

15 **Q. WHAT ARE YOU ASKING THE COMMISSION TO DO IN THIS**
16 **PROCEEDING?**

17 A. I respectfully request that the Commission approve the Company's 2022 ARM
18 filing and the 2022 ARM Revenue Requirement, which have been prepared in
19 accordance with the Approved Methodologies approved and adopted by the
20 Commission in Docket No. 14-00146.

21 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

22 A. Yes.

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

IN RE:

PETITION OF ATMOS ENERGY CORPORATION)
FOR APPROVAL OF ITS 2022 ANNUAL RATE) DOCKET NO. 22-00010
REVIEW FILING PURSUANT TO TENN.)
CODE ANN. § 65-5-103(d)(6))

VERIFICATION

STATE OF TEXAS)

COUNTY OF DALLAS)

I, William D. Matthews, being first duly sworn, state that I am the Manager of Rates and Regulatory Affairs for Atmos Energy Corporation, that I am authorized to testify on behalf of Atmos Energy Corporation in the above referenced docket, that the Direct Testimony of William D. Matthews in support of Atmos Energy Corporation's filing is true and correct to the best of my knowledge, information and belief.

William D. Matthews

Sworn and subscribed before me this 26th day of January, 2022.

Notary Public

My Commission Expires: 07/02/2024

