IN THE TENNESSEE PUBLIC UTILITY COMMISSION AT NASHVILLE, TENNESSEE

IN RE:)	
)	
ATMOS ENERGY CORPORATION)	
FOR APPROVAL OF ITS 2023 ANNUAL)	DOCKET NO. 23-00008
RATE REVIEW FILING PURSUANT)	
TO TENN. CODE ANN. § 65-5-103(d)(6))	
)	

CONSUMER ADVOCATE'S RESPONSES TO ATMOS' FIRST SET OF DISCOVERY REQUESTS

Jonathan Skrmetti, Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate Division of the Office of the Tennessee Attorney General ("Consumer Advocate"), pursuant to Rules 26, 33, and 34 of the Tennessee Rules of Civil Procedure, Tennessee Public Utility Commission ("TPUC" or The "Commission") Rule 1220-01-02-.11, and the Agreed Procedural Schedule entered by the Hearing Officer in this Docket, hereby submits its responses to the *First Set of Discovery Request of Atmos Energy Corporation* ("Atmos" or the "Company") filed on April 6, 2023.

General Objections

All of the General Objections made herein are applicable to and are hereby incorporated into each and every response herein, and each response herein is made subject to and without waiver of these General Objections.

- A. The Consumer Advocate objects to each of the Company's requests on the grounds that each is overly broad, unduly burdensome, and oppressive.
- B. The Consumer Advocate objects to the Company's discovery requests to the extent that they purport to impose the obligations upon the Consumer Advocate beyond those contemplated by the Tennessee Rules of Civil Procedure, TPUC Rules, and Tennessee law.

- C. The Consumer Advocate objects to each of the Company's requests to the extent that each purports to call for information and/or documents prepared in anticipation of litigation, and/or information and/or documents protected by the attorney-client privilege, the work product doctrine, the common-interest doctrine, or any other applicable protection or privilege.
- D. The Consumer Advocate objects to each of the Company's requests to the extent that they are not applicable in the context of a proceeding before the TPUC, cite an incorrect legal conclusion, or mischaracterize or improperly summarize statements made by the Consumer Advocate's expert witnesses in their pre-filed direct testimonies.
- E. By providing the objections contained herein, the Consumer Advocate does not waive or intend to waive, but rather, intends to preserve, all objections with regard to competence, relevance, materiality, and admissibility of the discovery information or documents in any subsequent proceeding on the related subject matter. Moreover, the Consumer Advocate intends by this set of responses to preserve all objections to vagueness, ambiguity, and undue burden in connection with requests to produce documents, including those that are not in the Consumer Advocate's possession, custody, or control.
- F. The responses made herein are made to the best of Consumer Advocate's present knowledge after a reasonably diligent search for responsive information. The Consumer Advocate will supplement its responses in line with the requirements of the Tennessee Rules of Civil Procedure as well as TPUC Rules and expressly reserves its right to supplement or amend its answers, if and as appropriate, including with respect to objections that may arise at a later time than this filing.

Without waiving these General Objections as they apply to each individual request, the Consumer Advocate presents the following responses:

CONSUMER ADVOCATE'S RESPONSES

1-01. Please provide all formulas, excel spreadsheets, and workpapers supporting Mr. Novak's calculations resulting in the (\$416,107) change in revenue deficiency as a result of his recommended changes to allocation factor calculations, as set forth in page 10 of his pre-filed testimony.

RESPONSE:

Please see the <WHN Analysis of Atmos ARM in Docket 23-00008> spreadsheet for a copy of Mr. Novak's ARM Reconciliation Model in this Docket. As noted in Footnote 15 of Mr. Novak's pre-filed testimony regarding allocation factors, the revenue deficiency impact of \$416,017 is calculated by adjusting the inputs in this model and then noting the resulting change in the revenue deficiency or surplus.

Specifically relating to allocation factors, please refer to the "Allocation Factors" tab of this spreadsheet for the allocation factor rates used in Mr. Novak's model. Next refer to Cell F35 of the "Operating Results" tab of Mr. Novak's model to see the \$416,017 revenue deficiency change that was observed when the allocation factors were changed from those used in the Company's filing.

1-02. Admit or deny that the Company followed its Cost Allocation Manual ("CAM") in performing its cost allocation in connection with its Petition in this matter. If you deny this statement, specify in detail (i) the ways in which you contend the Company failed to follow its CAM and (ii) when you contend Atmos Energy first made that methodology change in its annual ARM filings.

RESPONSE:

The Consumer Advocate is unable to either admit or deny this statement. Mr. Novak has no knowledge of the Company's utilization of its CAM in performing its cost allocation with its Petition in this matter and has not stated any position on the CAM in his pre-filed direct testimony.

1-03. Admit or deny that, as stated in the Company's response to your email shown on page 1 of WHN-3, there have been no methodology changes in allocating Div 02 O&M since the

Company's last Tennessee general rate case. If you deny this statement, specify in detail (i) the methodology changes which you believe the Company has made and (ii) when you contend Atmos Energy first made that methodology change in its annual ARM filings.

RESPONSE:

The Consumer Advocate is unable to either admit or deny this statement. Mr. Novak has no knowledge of the Company's methodology changes in allocated Div. 02 O&M since the Company's last Tennessee general rate case and has not stated any position on any allocation factor methodology changes in his pre-filed direct testimony.

1-04. Admit or deny that none of the Commission's Orders in Docket No. 20-00047 required regulated public utilities to re-implement forfeited discounts, late payment fees, reconnection fees, or other miscellaneous service charges upon resuming disconnections for non-payment. If you deny this statement, please identify by date and page number and quote all portions of the Orders on which you rely in denying this statement.

RESPONSE:

Admit that there is no language in Commission Orders requiring reimplementation of forfeited discounts, late payment fees, reconnection fees, and other miscellaneous charges upon resuming disconnections for non-payment; denied to the extent that the language in the Orders requires reimplementation of compliance with the utilities' own tariff schedules in administering forfeited discounts, late payment fees, reconnection fees, or other miscellaneous service charges.

The Commission's first Order in Docket No. 20-00047 prohibited every public utility under its jurisdiction from "...disconnecting natural gas, electric, water, or wastewater service to

any customer for reason of nonpayment during the course of Governor Bill Lee's March 12, 2020 declaration of public health emergency related to the COVID-19 virus." The Commission later stated that "The suspension of disconnections for non-payment, which has been in effect since March 2020, and applicable to all jurisdictional natural gas, electric, water, or wastewater service public utility regulated by the Tennessee Public Utility Commission is lifted effective August 29, 2020." After the Order lifting the suspensions, the Company was required to revert back to implementation of its own tariff schedules, some of which contain obligatory language in the charging of such forfeited fees, as it did prior to the TPUC Order requiring suspension of disconnections for lack of payment. The Commission's language that the suspension of disconnections was "not a long-term solution" and that there would be a "date on which the utility would resume [disconnections]" clearly shows the Commission's intent for regulated utilities to reimplement the disconnects and there attending fees after the emergency abated and subject to the tariffs previously dictating the administration of such fees. 4

1-05. Admit or deny that Atmos Energy's filing in this Docket accurately calculated the two-year average of actually collected forfeited discounts, miscellaneous service charges, and other items constituting Other Revenue. If you deny this statement, please state in detail what

Emergency Petition of the Consumer Advocate Unit of the Financial Division of the Office of the Tennessee Attorney General, Order Requiring all Jurisdictional Utilities to Suspend Actions to Disconnect Service for Lack of Payment During the State of Public Health Emergency, at 11, TPUC Docket No. 20-00047 (March 31, 2020).

Emergency Petition of the Consumer Advocate Unit of the Financial Division of the Office of the Tennessee Attorney General, Order Lifting Suspension of Disconnections of Service for Lack of Payment with Conditions, Effective on August 29, 2020, at 11, TPUC Docket No. 20-00047 (September 16, 2020).

³ Tennessee Regulatory Authority Gas Tariff of Atmos Energy Corporation, General Rules and Regulations, Sheet No. 60, 5.3 Activation Charge.

Emergency Petition of the Consumer Advocate Unit of the Financial Division of the Office of the Tennessee Attorney General, Order Lifting Suspension of Disconnections of Service for Lack of Payment with Conditions, Effective on August 29, 2020, 4, 10, TPUC Docket No. 20-00047 (September 16, 2020).

you contend the actual two-year average to be and provide all formulas, excel spreadsheets, and workpapers supporting your calculation.

RESPONSE:

The Consumer Advocate is unable to either admit or deny this statement. Mr. Novak has no knowledge if the Company accurately calculated the two-year average of actually collected forfeited discounts, miscellaneous service charges and other items constituting Other Revenue and has not stated any position on the accuracy of these amounts in his pre-filed direct testimony.

1-06. Please identify and quote from relevant portions of any Tariff Sheet, Commission Order, or Pre-Filed Testimony in other matters before the Commission on which Mr. Novak is relying in support of his claim, made on Page 12, A16 of his pre-filed testimony, that "The Company's tariff provisions for Other Revenues attempt to assign specific costs to the customers that cause those costs."

RESPONSE:

Mr. Novak is not relying on any Tariff Sheet, Commission Order or Pre-Filed Testimony regarding the Company's tariff provisions for Other Revenues, since these documents rarely mention the details of the reasons for creating specific rates and charges. Instead, Mr. Novak is relying on his 40-plus years of experience in developing rate structures that include separate charges for Other Revenue in order to recover costs associated with specific customers that cause those costs.

1-07. Admit or deny that the Consumer Advocate did not object to the Company's Other Revenue calculations in Docket No. 22-00010, despite the fact that the test period at issue

in that docket was also after the Commission lifted its moratorium on disconnections and despite the fact that the Company also did not charge forfeited discounts and miscellaneous service charges during that test period. If you deny this statement, please explain how and why you contend that the Company's practices related to Other Revenue differ between Docket No. 22-000010 and this docket.

RESPONSE:

The Consumer Advocate admits that it did not object in previous dockets but disagrees with the Company to the extent the Company is suggesting that the Consumer Advocate's action or inaction in a past docket bears on the propriety of raising the issue in this Docket. Discussions, strategies, decisions, and reasonings on specific issues to raise in each docket between Consumer Advocate attorneys and its experts is work product and privileged from production in this proceeding.

1-08. State the factual and legal basis for Mr. Novak's recommendation, as set forth in Pages 12-13, A17 of his pre-filed testimony, "that the Commission adopt the \$1,239,248 amount from the Company's last rate case as the appropriate level to include in the ARM reconciliation filing." Your answer should include, but not be limited to, (i) a citation to any authority on which Mr. Novak or the Consumer Advocate intends to rely in support of their request to apply figures from a prior test period with no connection to the actual revenue or expenses of the current test period; and (ii) an explanation concerning why other, more recent test periods could not be adopted.

RESPONSE:

The \$1,239,248 amount for Other Revenues adopted by the Commission in TPUC Docket No. 14-00146, represents the last time that there was a specific review of the value in this account. Since the Company suspended charging Other Revenues in 2020 without any later reinstatement, no recent test period value is available. Further, since the ARM mechanism trues-up any difference between the \$1,239,248 amount and what is actually recovered, adopting any other amount would be meaningless.

1-09. Please provide all formulas, excel spreadsheets, and workpapers supporting Mr. Novak's calculations resulting in a (\$1,200,536) change in revenue deficiency as a result of his proposed changes to Other Revenue, as set forth in page 13 of his pre-filed testimony.

RESPONSE:

Please see the <WHN Analysis of Atmos ARM in Docket 23-00008> spreadsheet for a copy of Mr. Novak's ARM Reconciliation Model in this Docket. As noted in Footnote 20 of Mr. Novak's pre-filed testimony regarding Other Revenues, the revenue deficiency impact of \$1,200,536 is calculated by adjusting the inputs in this model and then noting the resulting change in the revenue deficiency or surplus.

Specifically relating to Other Revenues, please refer to Cells FM26 and FM27 of the "Import" tab of this spreadsheet for the Other Revenues used in Mr. Novak's model. Next refer to Cell F37 of the "Operating Results" tab of Mr. Novak's model to see the \$1,200,536 revenue deficiency change that was observed when Other Revenues were changed from those used in the Company's filing.

1-10. Please provide the factual and legal basis for Mr. Novak's contention, in footnote 17 on page 11 of his pre-filed testimony, that full recovery of Atmos Energy's cost of service

would be an "unintended consequence" of the Commission's COVID Order in TPUC Docket No. 20-00047.

RESPONSE:

The Commission's third Order in TPUC Docket No. 20-00047 stated that "all issues related to the utilities' potential recovery of costs related to the COVID-19 public health emergency may be considered in future, individual docketed proceedings." As described in Mr. Novak's testimony, the Company was able to avoid a "future, individual docketed" proceeding by recovering its full cost of service through the ARM Mechanism, which was an unintended consequence of the Commission's COVID Order.

1-11. Please provide all formulas, excel spreadsheets, and workpapers supporting Mr. Novak's (\$807) "miscellaneous adjustments" mentioned at Page 4, Lines 25-26 of his pre-filed testimony.

RESPONSE:

Please see the <WHN Analysis of Atmos ARM in Docket 23-00008> spreadsheet for a copy of Mr. Novak's ARM Reconciliation Model in this Docket.

Specifically relating to Miscellaneous Adjustments, please refer to Cell J41 of the "Operating Results" tab of Mr. Novak's model to see the \$806 revenue deficiency change that was observed from the amount calculated in the Company's filing.

Emergency Petition of the Consumer Advocate Unit of the Financial Division of the Office of the Tennessee Attorney General, Order Lifting Suspension of Disconnections of Service for Lack of Payment with Conditions, Effective on August 29, 2020, 11-12, TPUC Docket No. 20-00047 (September 16, 2020).

RESPECTFULLY SUBMITTED,

VICTORIA B. GLOVER (BPR No. 037954)

Assistant Attorney General

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail, with a courtesy copy by electronic mail provided upon:

Erik Lybeck, Esq. Sims Funk, PLC 3322 West End Avenue, #200 Nashville, TN 37203

Phone: (615) 425-7030

Email: Elybeck@simsfunk.com

This the 11th day of April, 2023.

VICTORIA B. GLOVER

Assistant Attorney General

WHN Consulting ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Schedule 1 - Revenue Deficiency Calculation - Twelve Months Ended September 30, 2022

SOURCE: Atmos Schedule 1

		Docket 23-00008		
Item	ATMOS	WHN	Difference	
Rate Base	499,428,907	497,545,308	1,883,599	
Operating Income	34,155,903	35,052,165	-896,262	
Earned Rate of Return	6.84%	7.05%	-0.21%	
Fair Rate of Return	7.58%	7.58%	0.00%	
Required Operating Income	37,856,711	37,713,934	142,777	
Operating Income Deficiency/(Excess)	3,700,808	2,661,769	1,039,039	
Revenue Conversion Factor	1.357600	1.342900	0.014700	
Revenue Deficiency/(Surplus)	5,024,218	3,574,490	1,449,727	
Amortization of EDITL	-4,603,469	-4,603,469	0	
Annual Reconciliation Revenue Requirement	-393,912	-569,040	175,128	
Net Revenue Deficiency/(Surplus)	26,837	-1,598,019	1,624,855	
Company Error in CA1-7 for Plant	5,030	0	5,030	
Company Error on Common Equity in Lead/Lag	-3,163	0	-3,163	
Company Error on Allocation Factors	-416,017	0	-416,017	Company only acknowledges this to be a \$20,924 error.
Pro Forma Other Revenue	-1,200,536	0	-1,200,536	
Division 02 O&M Expense Changes	-9,363	0	-9,363	
Acknowledged Difference	-1,597,212	-1,598,019	806	

WHN Consulting
ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008
Schedule 2 - Average Rate Base - Twelve Months Ended September 30, 2022

SOURCE: Atmos Schedule 2RB

		Docket 23-00008			
Item	ATMOS	WHN	Difference	Notes	
Additions:					
Utility Plant in Service	811,685,075	811,146,870	538,205		
Contruction Work in Progress	11,767,197	11,714,042	53,155		
Working Capital / Deferred Rate Case	2,517,328	2,529,959	-12,631	Manually copy amount to avoid creating a circular reference	2,529,959
Materials & Supplies / Gas Inventory	8,627,217	8,627,170	47		
Intercompany Leased Property	5,985,565	5,985,565	0		
Cloud Projects	129,921	119,181	10,740		
Total Additions	840,712,303	840,122,787	589,516		
Deductions:					
Accumulated Depreciation	238,922,903	238,679,580	243,323		
Deferred Pension Regulated Asset	17,184,326	17,184,326	0		
Accumulated Deferred Income Taxes	75,558,974	77,096,381	-1,537,407		
Customer Advances for Construction	20,280	20,280	0		
Customer Deposits	1,069,120	1,069,120	0		
Accumulated Interest on Customer Deposits	18,913	18,913	0		
Capitalized Incentive Compensation	8,508,880	8,508,879	1		
Total Deductions	341,283,396	342,577,479	-1,294,083		
Rate Base	499,428,907	497,545,308	1,883,599		

WHN Consulting ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Schedule 3 - Income Statement - Twelve Months Ended September 30, 2022

SOURCE: Atmos Schedule 3IS

Item	ATMOS	WHN	Difference	Comi
Operating Revenues:				
Gas Sales & Transportation Revenues	201,244,758	201,244,758	0	
Other Revenues	68,517	1,239,248	-1,170,731	
AFUDC	909,566	909,566	0	
Total Operating Revenue	202,222,841	203,393,572	-1,170,731	
Operation & Maintenance Expenses:				
Purchased Gas Expense	111,383,269	111,383,272	-3	
Operations & Maintenance - Labor	8,024,006	8,071,129	-47,123	
Operations & Maintenance - Non-Labor	13,582,643	13,546,736	35,907	
Total O&M Expenses	132,989,918	133,001,137	-11,219	
-				
Other Expenses:	40.040.005	40.050.555	00.700	
Depreciation Expense	18,316,285	18,252,555	63,730	
Interest on Customer Deposits	38,488	38,488	0	
General Taxes	7,574,276	7,574,276	1	
State Excise Taxes	2,275,179	2,356,502	-81,323	
Federal Income Taxes	6,872,792	7,118,449	-245,657	
Total Other Expenses	35,077,020	35,340,270	-263,250	
Total Operating Expenses	168,066,938	168,341,407	-274,469	
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Utility Operating Income	34,155,903	35,052,165	-896,262	

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008

Schedule 4 - Operation & Maintenance Expenses - Twelve Months Ended September 30, 2022

SOURCE: Atmos Schedule 40&M

Item	ATMOS	WHN	Difference	Comments
abor:				
Labor	8,024,006	8,071,129	-47,123	
Total Labor	8,024,006	8,071,129	-47,123	
on-Labor:				
Benefits	2,624,373	2,914,847	-290,474	
Employee Welfare	2,108,523	2,002,070	106,453	
Insurance	1,732,999	1,657,445	75,554	
Rent, Maint., & Utilities	1,259,517	1,258,983	534	
Vehicles & Equip	547,003	546,540	463	
Materials and Supplies	525,007	521,989	3,018	
Information Technologies	1,515,263	1,461,913	53,350	
Telecom	398,263	401,517	-3,254	
Marketing	336,183	335,370	813	
Directors & Shareholders & PR	237,737	222,913	14,824	
Dues & Donations	205,354	187,637	17,717	
Print & Postage	57,870	57,079	791	
Travel & Entertainment	272,043	270,649	1,394	
Training	52,297	50,477	1,820	
Outside Services	6,635,877	6,334,798	301,079	
Provision for Bad Debt	250,728	250,728	0	
Miscellaneous	-3,954,013	-3,704,186	-249,827	
Rate Case Expense	0	0	0	
Elimination of Intercompany Leased Property - Rent	0	0	0	
Inclusion of Barnsley Storage Operating Expense	440,870	440,864	6	
Disallowed Items	-1,660,466	-1,662,111	1,645	
Actual Allocable Pension Contribution	0	0	0	
Legal Invoices Adjustment	-2,785	-2,785	0	
Total Non-Labor	13,582,643	13,546,736	35,907	
Total O&M Expense	21,606,649	21,617,865	-11,216	
Interest Expense	7,391,548	7,363,671	27,877	
Total Expense	28,998,197	28,981,536	16,661	

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Schedule 5 - Taxes Other Than Income - Twelve Months Ended September 30, 2022

SOURCE: Atmos Schedule 5Tax

		Docket 23-00008		
Item	ATMOS	WHN	Difference	Comments
Property Taxes	4,200,306	4,200,305	1	
State Gross Receipts Tax	717,361	717,361	0	
Payroll Taxes	721,854	721,854	0	
State Franchise Tax	1,301,996	1,301,996	0	
Other General Taxes	20,090	20,090	0	
TPUC Inspection Fee	612,669	612,669	0	
Total Taxes Other Than Income	7,574,276	7,574,276	1	

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ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Schedule 6 - Income Taxes - Twelve Months Ended September 30, 2022

SOURCE: Atmos Schedule 5Tax

	Docket 23-00008							
Item	ATMOS	WHN	Difference					
Operating Revenues	202,222,841	203,393,572	-1,170,731					
Operating Expenses:								
Purchased Gas Expense	111,383,269	111,383,272	-3					
O&M Expenses	21,606,649	21,617,865	-11,216					
Depreciation Expense	18,316,285	18,252,555	63,730					
Interest on Customer Deposits	38,488	38,488	0					
General Taxes	7,574,276	7,574,276	1					
Total Operating Expenses	158,918,967	158,866,455	52,512					
NOI Before Excise and Income Taxes	43,303,874	44,527,116	-1,223,242					
AFUDC	909,566	909,566	0					
Interest Expense	7,391,548	7,363,671	27,877					
Pre-tax Book Income	35,002,760	36,253,880	-1,251,120					
Schedule M Adjustments	0	0	0					
Excise Taxable Income	35,002,760	36,253,880	-1,251,120					
Excise Tax Rate	6.50%	6.50%	0.00%					
Excise Tax Payable	2,275,179	2,356,502	-81,323					
Excise Tax - Deferred	0	0	0					
State Excise Tax Expense	2,275,179	2,356,502	-81,323					
Pre-tax Book Income	35,002,760	36,253,880	-1,251,120					
State Excise Tax Expense	2,275,179	2,356,502	-81,323					
Schedule M Adjustments	0	0	0					
FIT Taxable Income	32,727,581	33,897,378	-1,169,797					
FIT Rate	21.00%	21.00%	0.00%					
Federal Income Tax Payable	6,872,792	7,118,449	-245,657					
FIT - Deferred	0	0	0					
Federal Income Tax Expense	6,872,792	7,118,449	-245,657					
Total Oate & Foderal Income Tou Forest	0.447.674	0.474.054	200 200					
Total Sate & Federal Income Tax Expense	9,147,971	9,474,951	-326,980					

WHN Consulting
ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008
Schedule 7 - Revenue Conversion Factor - Twelve Months Ended September 30, 2022

SOURCE: Atmos Schedule 7GU

		ocket 23-00008	
ltem	ATMOS	WHN	Difference
Tax Rates:			
Forfeited Discount Ratio	0.000000	0.010971	-0.010971
Uncollectible Ratio	0.002803	0.002803	0.000000
State Excise Tax Rate	0.065000	0.065000	0.000000
Federal Income Tax Rate	0.210000	0.210000	0.000000
Operating Revenues	1.000000	1.000000	0.000000
Forfeited Discount Adjustment	0.00000	0.010971	-0.010971
Balance	1.000000	1.010971	-0.010971
Bulance		1.010071	-0.010071
Uncollectible Ratio Adjustment	-0.002803	-0.002834	0.000031
Balance	0.997197	1.008137	-0.010940
		=======================================	
State Excise Tax Adjustment	-0.064818	-0.065529	0.000711
Balance	0.932379	0.942608	-0.010229
Federal Income Tax Adjustment	-0.195800	-0.197948	0.002148
Balance	0.736580	0.744660	-0.008081
Revenue Conversion Factor	1.357600	1.342900	0.014700
November Sollversion I actor	1.557 000	1.542300	3.014700

WHN Consulting ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Schedule 8 - Rate of Return - Twelve Months Ended September 30, 2022

SOURCE: Atmos Schedule 8CC

	Docket 23-00008				
Item	ATMOS	WHN	Difference		
Capital Structure:					
Short-Term Debt	0.09%	0.09%	0.00%		
Long-Term Debt	37.71%	37.71%	0.00%		
Common Equity	62.20%	62.20%	0.00%		
Total	100.00%	100.00%	0.00%		
Capital Cost:					
Short-Term Debt	28.15%	28.15%	0.00%		
Long-Term Debt	3.83%	3.83%	0.00%		
Common Equity	9.80%	9.80%	0.00%		
Weighted Cost:					
Short-Term Debt	0.03%	0.03%	0.00%		
Long-Term Debt	1.45%	1.45%	0.00%		
Common Equity	6.10%	6.10%	0.00%		
Total	7.58%	7.58%	0.00%		
		110070			
Interest Expense for Short-Term Debt:					
Rate Base	499,428,907	497,545,308	1,883,599		
Short-Term Weighted Debt Rate	0.03%	0.03%	0.00%		
Total Short-Term Debt Interest Expense	149,829	149,264	565		
Interest Expense for Long-Term Debt:					
Rate Base	499,428,907	497,545,308	1,883,599		
Long-Term Weighted Debt Rate	1.45%	1.45%	0.00%		
Total Long-Term Debt Interest Expense	7,241,719	7,214,407	27,312		
Total Interest Expense	7,391,548	7,363,671	27,877		
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	To O&M E	xpenses			

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Rate Base Workpapers

WHN Consulting ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Plant in Service Calculation - Plant Summary

	Total	Misc Deferred	
Month	Plant	Debit	Total
September-21	750,612,709	2,150,533	752,763,242
October-21	751,423,824	2,447,729	753,871,553
November-21	753,265,639	2,736,905	756,002,544
December-21	756,827,254	3,047,566	759,874,820
January-22	759,415,008	3,391,503	762,806,511
February-22	765,447,323	4,310,332	769,757,654
March-22	769,681,395	4,878,741	774,560,135
April-22	773,589,961	5,397,230	778,987,192
May-22	772,283,006	5,950,243	778,233,241
June-22	773,552,497	6,556,513	780,109,010
July-22	784,437,307	4,454,848	788,892,156
August-22	793,312,447	4,882,678	798,195,120
September-22	805,529,169	5,617,701	811,146,870
13-Month Average	769,952,118	4,294,040	774,246,15

Reconciliation <u>769,952,118</u> <u>1,315,365</u> <u>771,267,484</u>

Thanks William.

Here is another item that I hope you can help with.

On Workpaper 7-10, the Company adds the September 2022 total deferral associated with "Rule 8209" of \$5,617,701 to Plant in Service.

However, in the Reconciliation Adjustment, the Company only adds the average net deferral (after deducting interest and RWIP interest) of \$1,315,365 to Plant in Service.

Why the difference? It seems that the Company would take the end-of-period and the average balance from the same line item.

Hal Novak, CPA WHN CONSULTING

RE: Other Revenues in the ARM Filing

Matthew, William - Mitthew Battoneray com-Fit 124/1222 10:21 AM

To William Host State Statement Com-Cell William Hosts Ash Amore Company Company Com-Cell William Hosts Administration Statement Company Company Com-Cell William Hosts Administration Statement Company Company

Hence you would bit on a question I would already have the answer to at some point. Based upon the wording from the settlement agreement in 18-0011, pages 4.5 copies below, it states that for purposes of calculating average historic rate base as a part of the ARRR Interest deferrals and RWPI Interest Deferrals should be excluded.

I should have an answer on the O&M and Rate Base allocations from Shared Services to Tennessee back to you today also.

E. Amos Dargy will make a single annuel ADM files, which shall be note or or below Polymany (the "Amost Filing Dark"). The annuel ADM proceeding will serve two house forecome.

(i) First, ii, will destroom the Amost Bassechitation Revenue Registered Conference on the Registered Regis

WHN Consulting ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-08088 Plant in Service Calculation - Plant

2021 Factors		100%			41.90%			4.73%			4.13%			1.30%			2.11%			5.08%			1.26%		
2022 Factors		100%			40.87%			4.74%			3.58%			1.25%			2.53%			4.78%			1.31%		
	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Greeneville	Allocation	Tennessee	CKV	Allocation	Tennessee	AEAM	Allocation	Tennessee	ALGN	Allocation	Tennessee	Total
Month	93	Factor	Amount	91	Factor	Amount	12	Factor	Amount	2	Factor	Amount	Asset	Factor	Amount	Asset	Factor	Amount	Asset	Factor	Amount	Asset	Factor	Amount	Tennessee
September-21	734,575,928	100.00%	734,575,926	2,047,063	41.90%	857,789	135,300,137	4.73%	6,395,098	151,551,930	4.13%	6,261,635	9,267,669	1.30%	120,121	17,015,495	2.11%	359,027	34,982,672	5.08%	1,778,067	21,271,230	1.26%	267,049	750,612,709
October-21	736,236,788	100.00%	736,236,788	2,047,063	40.87%	838,539	135,300,137	4.74%	6,413,226	151,943,992	3.58%	5,439,595	9,267,669	1.25%	115,798	17,022,303	2.53%	430,664	34,982,229	4.78%	1,671,735	21,271,230	1.31%	279,481	751,423,824
November-21	738,071,723	100.00%	738,071,723	2,047,063	40.87%	838,539	135,300,137	4.74%	6,413,226	152,136,176	3.58%	5,446,475	9,267,669	1.25%	115,798	17,022,303	2.53%	430,664	34,982,229	4.78%	1,671,735	21,271,230	1.31%	279,481	753,265,639
December-21	741,520,418	100.00%	741,520,418	2,047,063	40.87%	838,539	135,682,133	4.74%	6,431,333	152,651,231	3.58%	5,484,914	14,440,570	1.25%	180,429	17,012,843	2.53%	430,425	34,982,164	4.78%	1,671,732	22,183,283	1.31%	291,465	756,827,254
January-22	744,117,721	100.00%	744,117,721	2,047,063	40.87%	836,539	135,683,455	4.74%	6,431,396	152,744,838	3.58%	5,468,265	13,516,270	1.25%	168,880	17,012,843	2.53%	430,425	34,952,574	4.78%	1,670,318	22,183,283	1.31%	291,465	759,415,008
February-22	750,145,826	100.00%	750,145,826	2,047,063	40.87%	836,539	135,683,148	4.74%	6,431,381	152,746,290	3.58%	5,468,317	13,518,082	1.25%	168,903	17,112,557	2.53%	432,948	34,982,164	4.78%	1,671,732	22,199,439	1.31%	291,677	765,447,323
March-22	754,378,128	100.00%	754,378,128	2,047,063	40.87%	836,539	135,683,163	4.74%	6,431,382	152,762,695	3.58%	5,468,904	13,709,849	1.25%	171,299	17,064,619	2.53%	431,735	34,982,164	4.78%	1,671,732	22,199,408	1.31%	291,676	769,681,395
April-22	758,280,456	100.00%	758,280,456	2,047,063	40.87%	836,539	135,683,163	4.74%	6,431,382	152,896,413	3.58%	5,473,692	13,825,998	1.25%	172,750	17,064,619	2.53%	431,735	34,982,164	4.78%	1,671,732	22,199,408	1.31%	291,676	773,589,961
May-22	756,678,468	100.00%	756,678,468	2,047,063	40.87%	836,539	141,685,238	4.74%	6,715,880	153,145,970	3.58%	5,482,626	13,827,034	1.25%	172,763	17,127,317	2.53%	433,321	34,982,164	4.78%	1,671,732	22,199,408	1.31%	291,676	772,283,006
June-22	757,933,957	100.00%	757,933,957	2,047,063	40.87%	836,539	141,875,925	4.74%	6,724,919	153,278,326	3.58%	5,487,364	13,827,859	1.25%	172,773	17,135,842	2.53%	433,537	34,982,164	4.78%	1,671,732	22,199,408	1.31%	291,676	773,552,497
July-22	768,793,937	100.00%	768,793,937	2,047,063	40.87%	836,539	141,862,976	4.74%	6,724,305	153,987,720	3.58%	5,512,760	13,827,859	1.25%	172,773	17,137,741	2.53%	433,585	34,982,164	4.78%	1,671,732	22,199,408	1.31%	291,676	784,437,307
August-22	777,298,543	100.00%	777,298,543	2,047,063	40.87%	836,539	141,998,422	4.74%	6,730,725	164,053,778	3.58%	5,873,125	14,127,889	1.25%	176,522	17,137,741	2.53%	433,585	34,982,164	4.78%	1,671,732	22,199,408	1.31%	291,676	793.312.447
September-22	789,452,196	100.00%	789,452,196	2,047,063	40.87%	838,539	142,065,113	4.74%	6,733,886	165,719,509	3.58%	5,932,758	14,147,907	1.25%	176,772	17,138,728	2.53%	433,610	34,982,164	4.78%	1,671,732	22,199,408	1.31%	291,676	805,529,169
13-Month Avera	754,421,853		754,421,853	2,047,063		838,173	137,984,857		6,539,088	154,586,067		5,598,495	12,813,256		160,429	17,077,304		426,558	34,979,937	-	1,679,649	21,982,735		287,873	769,952,118

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Plant in Service Calculation - Miscellaenous Deferred Debit

	Tennessee
Month	Amount
September-21	2,150,533
October-21	2,447,729
November-21	2,736,905
December-21	3,047,566
January-22	3,391,503
February-22	4,310,332
March-22	4,878,741
April-22	5,397,230
May-22	5,950,243
June-22	6,556,513
July-22	4,454,848
August-22	4,882,678
September-22	5,617,701
13-Month Average	4,294,040

WHN Consulting
ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008
Construction Work in Progress

2021 Factors		100%			41.90%			4.73%			4.13%		
2022 Factors		100%			40.87%			4.74%			3.58%		
	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Total
Month	93	Factor	Amount	91	Factor	Amount	12	Factor	Amount	2	Factor	Amount	Tennessee
September-21	9,048,502	100.00%	9,048,502	474,495	41.90%	198,830	3,809,753	4.73%	180,072	32,439,702	4.13%	1,340,303	10,767,707
October-21	11,561,996	100.00%	11,561,996	363,807	40.87%	148,671	4,022,472	4.74%	190,665	36,563,802	3.58%	1,308,984	13,210,316
November-21	15,014,147	100.00%	15,014,147	2,422,841	40.87%	990,102	4,272,697	4.74%	202,526	22,101,795	3.58%	791,244	16,998,019
December-21	16,684,960	100.00%	16,684,960	592,908	40.87%	242,294	4,516,009	4.74%	214,059	15,680,460	3.58%	561,360	17,702,673
January-22	18,380,098	100.00%	18,380,098	67,398	40.87%	27,543	4,975,702	4.74%	235,848	18,797,559	3.58%	672,953	19,316,441
February-22	16,144,535	100.00%	16,144,535	284,607	40.87%	116,306	5,304,340	4.74%	251,426	22,083,443	3.58%	790,587	17,302,853
March-22	16,285,100	100.00%	16,285,100	572,470	40.87%	233,942	5,721,677	4.74%	271,208	18,589,510	3.58%	665,504	17,455,754
April-22	16,932,719	100.00%	16,932,719	390,952	40.87%	159,764	6,083,038	4.74%	288,336	23,662,875	3.58%	847,131	18,227,949
May-22	18,870,909	100.00%	18,870,909	151,055	40.87%	61,729	780,276	4.74%	36,985	22,284,657	3.58%	797,791	19,767,414
June-22	20,138,747	100.00%	20,138,747	514,579	40.87%	210,284	865,181	4.74%	41,010	23,220,884	3.58%	831,308	21,221,348
July-22	22,009,164	100.00%	22,009,164	306,220	40.87%	125,138	944,116	4.74%	44,751	24,799,031	3.58%	887,805	23,066,859
August-22	19,763,696	100.00%	19,763,696	-320,076	40.87%	-130,800	1,027,188	4.74%	48,689	14,475,082	3.58%	518,208	20,199,792
September-22	11,084,898	100.00% _	11,084,898	-51,046	40.87% _	-20,860	1,273,561	4.74%	60,367	16,470,321	3.58% _	589,637	11,714,042
13-Month Average	16,301,498		16,301,498	443,862		181,765	3,353,539		158,918	22,397,625		815,601	17,457,782

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Inventory Calculation - Summary

	Gas Supply	Material	
Month	Inventory	Inventory	Total
September-21	7,862,456	654,598	8,517,054
October-21	10,271,178	288,294	10,559,471
November-21	8,887,254	288,294	9,175,547
December-21	9,497,224	288,020	9,785,244
January-22	5,372,423	263,052	5,635,476
February-22	2,846,484	263,052	3,109,536
March-22	1,363,897	269,469	1,633,366
April-22	2,724,622	281,143	3,005,764
May-22	5,941,765	288,160	6,229,925
June-22	8,055,945	291,171	8,347,116
July-22	11,111,160	289,547	11,400,707
August-22	14,766,910	337,848	15,104,759
September-22	18,387,362	1,261,879	19,649,240
13-Month Average	8,237,591	389,579	8,627,170

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Gas Inventory

2021 Factors 100% **2022 Factors** 100%

Month	Division 93	Allocation Factor	Tennessee Amount			
September-21	7,862,456	100.00%	7,862,456			
October-21	10,271,178	100.00%	10,271,178			
	, ,		, ,			
November-21	8,887,254	100.00%	8,887,254			
December-21	9,497,224	100.00%	9,497,224			
January-22	5,372,423	100.00%	5,372,423			
February-22	2,846,484	100.00%	2,846,484			
March-22	1,363,897	100.00%	1,363,897			
April-22	2,724,622	100.00%	2,724,622			
May-22	5,941,765	100.00%	5,941,765			
June-22	8,055,945	100.00%	8,055,945			
July-22	11,111,160	100.00%	11,111,160			
August-22	14,766,910	100.00%	14,766,910			
September-22	18,387,362	100.00%	18,387,362			
13-Month Average	8,237,591		8,237,591			
		-				

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Materials & Supply Inventory

2021 Factors 41.90% **2022 Factors** 40.87%

	Division	Allocation	Tennessee		
Month	91	Factor	Amount		
September-21	1,562,160	41.90%	654,598		
October-21	705,473	40.87%	288,294		
November-21	705,473	40.87%	288,294		
December-21	704,803	40.87%	288,020		
January-22	643,705	40.87%	263,052		
February-22	643,705	40.87%	263,052		
March-22	659,407	40.87%	269,469		
April-22	687,974	40.87%	281,143		
May-22	705,146	40.87%	288,160		
June-22	712,515	40.87%	291,171		
July-22	708,540	40.87%	289,547		
August-22	826,736	40.87%	337,848		
September-22	3,087,897	40.87%	1,261,879		
13-Month Average	950,272		389,579		

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Elimination of Intercompany Leased Property

2021 Factors 100% **2022 Factors** 100%

		10070	
	Division	Allocation	Tennessee
Month	93	Factor	Amount
September-21	6,253,167	100.00%	6,253,167
October-21	6,231,664	100.00%	6,231,664
November-21	6,210,160	100.00%	6,210,160
December-21	6,188,657	100.00%	6,188,657
January-22	6,167,154	100.00%	6,167,154
February-22	6,145,651	100.00%	6,145,651
March-22	6,124,148	100.00%	6,124,148
April-22	6,102,645	100.00%	6,102,645
May-22	6,081,141	100.00%	6,081,141
June-22	6,057,214	100.00%	6,057,214
July-22	6,033,260	100.00%	6,033,260
August-22	6,009,111	100.00% _	6,009,111
September-22	5,985,565	100.00%	5,985,565
13-Month Average	6,122,272	_	6,122,272

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Intangible Plant - Cloud Projects

2021 Factors 4.13% **2022 Factors** 3.58%

Month	Division 2	Allocation Factor	Tennessee Amount			
September-21	3,852,569	4.13%	159,176			
October-21	3,698,791	3.58%	132,417			
November-21	3,597,056	3.58%	128,775			
December-21	3,452,629	3.58%	123,604			
January-22	3,296,332	3.58%	118,009			
February-22	3,140,469	3.58%	112,429			
March-22	2,984,425	3.58%	106,842			
April-22	2,828,381	3.58%	101,256			
May-22	3,346,984	3.58%	119,822			
June-22	3,250,784	3.58%	116,378			
July-22	3,068,257	3.58%	109,844			
August-22	3,509,675	3.58%	125,646			
September-22	3,329,064	3.58%	119,181			
13-Month Average	3,335,032		121,029			

WHN Consulting
ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-0008
Accumulated Depreciation

Accumulated Depreciation																									
2021 Factors		100%			41.90%			4.73%			4.13%			1.30%			2.11%			5.08%			1.26%		
2022 Factors		100%			40.87%			4.74%			3.58%			1.25%			2.53%			4.78%			1.31%		
	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Greeneville	Allocation	Tennessee	CKV	Allocation	Tennessee	AEAM	Allocation	Tennessee	ALGN	Allocation	Tennessee	Total
Month	93	Factor	Amount	91	Factor	Amount	12	Factor	Amount	2	Factor	Amount	Asset	Factor	Amount	Asset	Factor	Amount	Asset	Factor	Amount	Asset	Factor	Amount	Tennessee
September-21	229,406,526	100.00%	229,406,526	406,762	41.90%	170,447	64,794,537	4.73%	3,082,579	66,923,129	4.13%	2,765,047	4,565,028	1.30%	59,168	5,161,579	2.11%	108,909	17,983,381	5.08%	913,014	7,963,518	1.26%	99,978	236,585,669
October-21	230,597,125	100.00%	230,597,125	408,982	40.87%	167,132	65,507,814	4.74%	3,105,070	67,115,140	3.58%	2,402,722	4,588,558	1.25%	57,332	5,208,912	2.53%	131,785	18,192,700	4.78%	869,395	8,082,354	1.31%	106,193	237,436,755
November-21	231,813,739	100.00%	231,813,739	411,202	40.87%	168,039	66,221,091	4.74%	3,138,880	68,863,693	3.58%	2,465,320	4,612,088	1.25%	57,626	5,256,241	2.53%	132,983	18,402,020	4.78%	879,398	8,201,052	1.31%	107,753	238,763,738
December-21	233,044,149	100.00%	233,044,149	413,422	40.87%	168,946	66,885,032	4.74%	3,170,351	67,068,974	3.58%	2,401,069	4,643,478	1.25%	58,018	5,294,088	2.53%	133,940	18,611,339	4.78%	889,401	8,322,743	1.31%	109,352	239,975,227
January-22	234,255,095	100.00%	234,255,095	415,642	40.87%	169,854	67,599,987	4.74%	3,204,239	67,890,844	3.58%	2,430,492	4,673,313	1.25%	58,391	5,341,263	2.53%	135,134	18,820,524	4.78%	899,398	8,444,433	1.31%	110,951	241,263,553
February-22	234,804,887	100.00%	234,804,887	417,862	40.87%	170,761	68,314,939	4.74%	3,238,128	68,708,050	3.58%	2,459,748	4,703,153	1.25%	58,764	5,389,170	2.53%	138,346	19,029,859	4.78%	909,401	8,566,190	1.31%	112,551	241,890,586
March-22	235,994,878	100.00%	235,994,878	420,082	40.87%	171,668	69,029,892	4.74%	3,272,017	69,510,155	3.58%	2,488,464	4,733,408	1.25%	59,142	5,388,883	2.53%	138,339	19,239,195	4.78%	919,405	8,687,946	1.31%	114,150	243,156,062
April-22	237,250,397	100.00%	237,250,397	422,303	40.87%	172,575	69,744,845	4.74%	3,305,908	70,310,114	3.58%	2,517,102	4,763,958	1.25%	59,524	5,436,456	2.53%	137,542	19,448,531	4.78%	929,409	8,809,703	1.31%	115,750	244,488,205
May-22	232,867,846	100.00%	232,867,846	424,523	40.87%	173,483	70,505,775	4.74%	3,341,974	71,107,959	3.58%	2,545,665	4,794,511	1.25%	59,905	5,484,297	2.53%	138,753	19,657,867	4.78%	939,413	8,931,459	1.31%	117,350	240,184,388
June-22	229,889,214	100.00%	229,889,214	426,743	40.87%	174,390	71,276,353	4.74%	3,378,499	71,967,844	3.58%	2,576,449	4,824,972	1.25%	60,286	5,532,162	2.53%	139,964	19,869,538	4.78%	949,528	9,053,880	1.31%	118,958	237,287,287
July-22	234,190,318	100.00%	234,190,318	428,963	40.87%	175,297	72,046,764	4.74%	3,415,017	72,830,183	3.58%	2,607,321	4,855,432	1.25%	60,667	5,580,052	2.53%	141,175	20,081,208	4.78%	959,643	9,176,300	1.31%	120,567	241,670,004
August-22	234,666,983	100.00%	234,666,983	431,183	40.87%	176,204	72,818,605	4.74%	3,451,602	73,878,759	3.58%	2,644,860	4,888,165	1.25%	61,076	5,627,941	2.53%	142,387	20,292,879	4.78%	969,759	9,298,720	1.31%	122,175	242,235,045
September-22	231,021,584	100.00%	231,021,584	433,403	40.87%	177,111	73,594,084	4.74%		74,982,720	3.58% _	2,684,381	4,921,200	1.25%	61,488	5,652,864	2.53%	143,017	20,504,550	4.78%	979,874	9,421,131	1.31%	123,784	238,679,580
13-Month Averas	233,061,748		233,061,748	420,082		171,993	69,103,055		3,274,817	70,089,043		2,537,588	4,735,943		59,337	5,411,839		135,252	19,241,046		923,618	8,689,187		113,809	240,278,162

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Deferred Pension Reglatory Asset

2021 Factors 100% **2022 Factors** 100%

	Division	Allocation	Tennessee		
Month	93	Factor	Amount		
September-21	-23,297,122	100.00%	-23,297,122		
October-21	-22,787,722	100.00%	-22,787,722		
November-21	-22,278,322	100.00%	-22,278,322		
December-21	-21,768,922	100.00%	-21,768,922		
January-22	-21,259,523	100.00%	-21,259,523		
February-22	-20,750,123	100.00%	-20,750,123		
March-22	-20,240,724	100.00%	-20,240,724		
April-22	-19,731,324	100.00%	-19,731,324		
May-22	-19,221,924	100.00%	-19,221,924		
June-22	-18,712,523	100.00%	-18,712,523		
July-22	-18,203,123	100.00%	-18,203,123		
August-22	-17,693,724	100.00% _	-17,693,724		
September-22	-17,184,326	100.00%	-17,184,326		
13-Month Average	-20,240,723	=	-20,240,723		

WHN Consulting
ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008
Accumulated Deferred Income Taxes

2021 Factors		100%			41.90%			4.73%			4.13%		
2022 Factors		100%			40.87%			4.74%			3.58%		
	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Division	Allocation	Tennessee	Total
Month	93	Factor	Amount	91	Factor	Amount	12	Factor	Amount	2	Factor	Amount	Tennessee
September-21	-80,307,951	100.00%	-80,307,951	-4,820,270	41.90%	-2,019,858	-14,654,092	4.73%	-692,640	550,204,761	4.13%	22,732,678	-60,287,771
October-21	-80,441,083	100.00%	-80,441,083	-4,820,270	40.87%	-1,969,819	-14,654,092	4.74%	-694,604	559,265,874	3.58%	20,021,718	-63,083,787
November-21	-80,574,215	100.00%	-80,574,215	-4,820,270	40.87%	-1,969,819	-14,654,092	4.74%	-694,604	570,003,952	3.58%	20,406,141	-62,832,496
December-21	-84,934,672	100.00%	-84,934,672	-4,145,089	40.87%	-1,693,904	-14,381,048	4.74%	-681,662	574,796,520	3.58%	20,577,715	-66,732,522
January-22	-85,067,803	100.00%	-85,067,803	-4,145,089	40.87%	-1,693,904	-14,381,048	4.74%	-681,662	557,554,824	3.58%	19,960,463	-67,482,906
February-22	-85,200,935	100.00%	-85,200,935	-4,145,089	40.87%	-1,693,904	-14,381,048	4.74%	-681,662	555,621,897	3.58%	19,891,264	-67,685,237
March-22	-87,685,016	100.00%	-87,685,016	-3,333,697	40.87%	-1,362,326	-14,278,566	4.74%	-676,804	539,608,094	3.58%	19,317,970	-70,406,176
April-22	-87,818,148	100.00%	-87,818,148	-3,333,697	40.87%	-1,362,326	-14,278,566	4.74%	-676,804	505,908,925	3.58%	18,111,540	-71,745,738
May-22	-87,951,279	100.00%	-87,951,279	-3,333,697	40.87%	-1,362,326	-14,278,566	4.74%	-676,804	497,370,765	3.58%	17,805,873	-72,184,536
June-22	-88,039,339	100.00%	-88,039,339	-3,924,818	40.87%	-1,603,889	-13,887,329	4.74%	-658,259	455,340,419	3.58%	16,301,187	-74,000,301
July-22	-88,172,471	100.00%	-88,172,471	-3,924,818	40.87%	-1,603,889	-13,887,329	4.74%	-658,259	469,982,257	3.58%	16,825,365	-73,609,255
August-22	-88,305,603	100.00%	-88,305,603	-3,924,818	40.87%	-1,603,889	-13,887,329	4.74%	-658,259	455,853,369	3.58%	16,319,551	-74,248,201
September-22	-91,974,711	100.00%	-91,974,711	-3,774,304	40.87%	-1,542,381	-13,552,864	4.74%	-642,406	476,623,376	3.58%	17,063,117	-77,096,381
13-Month Average	-85,882,556		-85,882,556	-4,034,302		-1,652,479	-14,242,767		-674,956	520,625,772		18,871,891	-69,338,100

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Customer Advances

2021 Factors 100% **2022 Factors** 100%

	Division	Allocation	Tennessee		
Month	93	Factor	Amount		
September-21	-20,280	100.00%	-20,280		
October-21	-20,280	100.00%	-20,280		
November-21	-20,280	100.00%	-20,280		
December-21	-20,280	100.00%	-20,280		
January-22	-20,280	100.00%	-20,280		
February-22	-20,280	100.00%	-20,280		
March-22	-20,280	100.00%	-20,280		
April-22	-20,280	100.00%	-20,280		
May-22	-20,280	100.00%	-20,280		
June-22	-20,280	100.00%	-20,280		
July-22	-20,280	100.00%	-20,280		
August-22	-20,280	100.00%	-20,280		
September-22	-20,280	100.00%	-20,280		
13-Month Average	-20,280		-20,280		

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Customer Deposits

 2021 Factors
 100%

 2022 Factors
 100%

	Division	Allocation	Tennessee		
Month	93	Factor	Amount		
September-21	-1,059,185	100.00%	-1,059,185		
October-21	-1,015,791	100.00%	-1,015,791		
November-21	-1,000,121	100.00%	-1,000,121		
December-21	-959,878	100.00%	-959,878		
January-22	-942,080	100.00%	-942,080		
February-22	-948,403	100.00%	-948,403		
March-22	-997,271	100.00%	-997,271		
April-22	-1,030,297	100.00%	-1,030,297		
May-22	-1,053,492	100.00%	-1,053,492		
June-22	-1,111,979	100.00%	-1,111,979		
July-22	-1,159,360	100.00%	-1,159,360		
August-22	-1,267,910	100.00%	-1,267,910		
September-22	-1,352,786	100.00%	-1,352,786		
13-Month Average	-1,069,120		-1,069,120		

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Accumulated Interest on Customer Deposits

2021 Factors 100% **2022 Factors** 100%

	Division	Allocation	Tennessee		
Month	93	Factor	Amount		
September-21	-12,658	100.00%	-12,658		
October-21	-13,752	100.00%	-13,752		
November-21	-14,431	100.00%	-14,431		
December-21	-15,414	100.00%	-15,414		
January-22	-16,858	100.00%	-16,858		
February-22	-17,880	100.00%	-17,880		
March-22	-19,429	100.00%	-19,429		
April-22	-21,028	100.00%	-21,028		
May-22	-22,004	100.00%	-22,004		
June-22	-21,970	100.00%	-21,970		
July-22	-22,977	100.00%	-22,977		
August-22	-23,535	100.00%	-23,535		
September-22	-23,938	100.00%	-23,938		
13-Month Average	-18,913		-18,913		

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Capitalized Incentive Compensation

	Capitalized	Depreciation
Date	Amount	Amount
Twelve Months Ended May 31, 2016	1,042,875	29,796
Twelve Months Ended September 30, 2017	1,134,172	29,847
Twelve Months Ended September 30, 2018	894,612	22,939
Twelve Months Ended September 30, 2019	976,782	24,420
Twelve Months Ended September 30, 2020	1,172,152	28,589
Twelve Months Ended September 30, 2021	1,819,062	43,311
Twelve Months Ended September 30, 2022	1,469,224	33,391
Total	8,508,879	212,293

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Income Statement Workpapers

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Revenues

Item	Amount
Sales & Transportation Revenue:	
Total Adjusted Revenue Margin	89,861,486
Purchased Gas Expense	112,601,019
Less Elimination of Leased Storage Rent	-1,217,747
Total Sales & Transportation Revenue	201,244,758
Other Revenue:	
Forfeited Discounts	811,372
Miscellaneous Service Revenue	427,876
Total Other Revenue	1,239,248
Reconciliation Revenue Calculation:	
Revenue per Books	199,018,745
Prior Period Reconciliation Revenue	-4,303,271
Prior Period Excess Deferred Income Tax Liability Amortization	6,112,798
Total	200,828,272
Less Purchased Gas Cost	111,383,272
Reconciliation Gross Margin	89,445,000

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Purchased Gas Expense

2021 Factors 2022 Factors		100% 100%	
	Division	Allocation	Tennessee
Month	93	Factor	Amount
October-21	4,460,572	100.00%	4,460,572
November-21	11,705,554	100.00%	11,705,554
December-21	13,187,619	100.00%	13,187,619
January-22	22,440,140	100.00%	22,440,140
February-22	17,523,751	100.00%	17,523,751
March-22	11,155,187	100.00%	11,155,187
April-22	7,113,022	100.00%	7,113,022
May-22	4,804,433	100.00%	4,804,433
June-22	4,939,315	100.00%	4,939,315
July-22	5,139,615	100.00%	5,139,615
August-22	4,716,307	100.00%	4,716,307
September-22	5,415,504	100.00%	5,415,504
Total	112,601,019	_	112,601,019
Less Elimination of Leased Storage Rent		_	-1,217,747
Total Adjusted Purchased Gas Cost			111,383,272

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Allowance for Funds Used During Construction

2021 Factors	100%
2022 Factors	100%

2022 Factors 100 %			
Division	Allocation	Tennessee	
93	Factor	Amount	
51,617	100.00%	51,617	
78,073	100.00%	78,073	
94,873	100.00%	94,873	
93,979	100.00%	93,979	
89,168	100.00%	89,168	
99,800	100.00%	99,800	
102,711	100.00%	102,711	
113,444	100.00%	113,444	
139,632	100.00%	139,632	
151,386	100.00%	151,386	
134,054	100.00%	134,054	
82,653	100.00% _	82,653	
1,231,389		1,231,389	
	93 51,617 78,073 94,873 93,979 89,168 99,800 102,711 113,444 139,632 151,386 134,054 82,653	Division Allocation 93 Factor 51,617 100.00% 78,073 100.00% 94,873 100.00% 93,979 100.00% 89,168 100.00% 99,800 100.00% 102,711 100.00% 113,444 100.00% 139,632 100.00% 151,386 100.00% 134,054 100.00% 82,653 100.00%	

	Rate	Amount
Gross AFUDC		1,231,389
Tennessee Excise Tax Impact	6.50%	-80,040
Subtotal		1,151,349
Federal Income Tax Impact	21.00%	-241,783
Net AFUDC Amount		909,566

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Operation & Maintenance Expense for the 12 Months Ended September 30, 2022

	Total
Month	Tennessee
1-Labor	8,071,129
2-Benefits	
Regular Benefits	2,492,192
20-Pension-Tennessee Allocation	540,850
21-Pension-Capitalized	-118,195
Total Benefits	2,914,847
3-Employee Welfare	2,002,070
4-Insurance	1,657,445
5-Rent, Maintenance & Utilities	1,258,983
6-Vehicles & Equipment	546,540
7-Materials & Supplies	521,989
8-Information Technology	1,461,913
9-Telecom	401,517
10-Marketing	335,370
11-Directors, Sharholders & PR	222,913
12-Dues & Donations	187,637
13-Printing & Postage	57,079
14-Travel & Entertainment	270,649
15-Training	50,477
16-Outside Services	6,334,798
17-Provision for Bad Debt	250,728
18-Miscellaneous & Unallocated Cost Center	-3,704,186
25-Inclusion of Barnsley Storage Operating Exp	440,864
, 3 1	-,
Disallowed Expenses:	
19-Disallowed Expenses	-337,589
22-Incentive Compensation Adjustment (MFR #38)	-1,258,670
23-SERP Adjustment	-65,852
Total Disallowed Expenses	-1,662,111
24-Legal Invoices Adjustment	-2,785
Total	21,617,865

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008
Operation & Maintenance Expense for the 12 Months Ended September 30, 202

11,835,415

11,835,415 9,838,071

41.90% 40.87% Allocation Factor 4.74% Allocation Factor 3.58% Allocation Factor Division 91 3,093,082 1,525,323 1,698,810 Division 12 29,616,600 8,884,980 585,926 77,068 Tennessee Amount 1,264,143 623,400 694,304 4,712 116,946 Tennessee Amount 56,874,302 19,317,596 34,535,122 41,292,978 5,859,077 Month Factor 100.00% 100.00% 100.00% Amount 1,403,827 421,148 27,773 8,071,129 2,492,192 3,367,059 756,075 43,636 1-Labor 2-Benefits 3-Employee Welfare 4-Insurance 5-Rent, Maintenance & Utilities 3,367,059 756,075 43,636 3.58% 3.58% 3.58% 2,036,100 691,570 1,236,357 40.87% 40.87% 40.87% 4.74% 4.74% 4.74% 4.74% 4.74% 2,002,070 170,791 3.58% 3.58% 170,791 100.00% 11,530 286,141 40.87% 40.87% 3,653 1,478,289 1,657,445 100.00% 2,356,928 111,718 820,563 820,563 209,755 1,258,983 6-Vehicles & Equipment 7-Materials & Supplies 8-Information Technology 100.00% 100.00% 100.00% 505,913 452,206 29,545 144,498 177,589 83,833 66,951 131,083 34,263 27,363 53,574 9,044 65,773 5,907,563 429 3,118 280,018 3.58% 3.58% 3.58% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 4.74% 505,913 40.87% 165,819 1,097,826 5,936 546,540 521,989 452,206 29,545 144,498 177,589 40.87% 40.87% 39,302 30,692,057 1,098,776 1,461,913 9-Telecom 10-Marketing 100.00% 100.00% 194.699 40.87% 40.87% 79,574 152,054 1,596,259 35,604 75,663 1,688 2.843.084 3.58% 3.58% 101,782 401,517 335,370 1-Di-Marketing
11-Directors, Sharholders & PR
12-Dues & Donations
13-Printing & Postage
14-Travel & Entertainment
15-Training
16-Outside Services
17-Provision for Bad Debt
17-Brovision for Bad Debt
18-Miscellaneous & Unallocated Cost Center
19-Disallowed Expenses
20-Pension-Tenessee Allocation
21-Pension-Capitalized
22-Incortive Compensation Adjustment (MFR #38)
23-SERP Adjustment
24-Legal Invoices Adjustment 372,044 112.828 4.039 112,828 5,654,890 980,515 415,141 716,735 606,960 19,136,566 35,604 431,821 8,374 70,040 117,203 16,881 2,322,212 100.00% 100.00% 100.00% 40.87% 40.87% 40.87% 40.87% 20,468 397 3,320 5,555 800 202,445 35,102 14,862 222,913 187,637 57,079 3.58% 3.58% 3.58% 3.58% 3.58% 3.58% 3.58% 3.58% 3.58% 3.58% 3.58% 0 147,752 33,361 109,516 13,780 4,549,539 250,728 2,346 -162,138 540,850 -118,195 0 147,752 33,361 109,516 13,780 4,549,539 250,728 2,346 -162,138 540,850 -118,195 0 10,730 13,545 317,881 34,665 2,422,552 4,385 5,536 129,918 14,168 990,097 57,079 270,649 50,477 6,334,798 550,728 -3,704,186 -337,589 540,850 -118,195 -1,258,670 -65,852 -2,785 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 25,659 21,729 685,089 40.87% 40.87% 40.87% 40.87% 40.87% 40.87% 40.87% 40.87% 40.87% 40.87% 40.87% -286,353 -138,446 -117,032 -56,583 -77,115 -1,024,847 -3,655 -48,578 -100,163,250 -1,963,428 -3,585,844 -70,291 -617,591 -48,907 -1,516,083 -41,461 -6,815 -619,623 -16,945 -2,785

3,381,466 51,000,313

2,395,959 118,174,820

3,564,161 21,177,001

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008

ALEX BRADLEY ADJUSTMENTS TO FY22 O&M EXPENSES FOR DIVISION 02 $\,$

SOURCE: Alex Bradley Workpapers.

		Division 02			
Month	As Filed	Adjusted	Difference		
1-Labor	56,874,302	56,874,302	0		
2-Benefits	12,048,386	19,317,596	7,269,209		
3-Employee Welfare	34,535,122	34,535,122	0		
4-Insurance	39,842,978	41,292,978	1,450,000		
5-Rent, Maintenance & Utilities	5,859,077	5,859,077	0		
6-Vehicles & Equipment	165,819	165,819	0		
7-Materials & Supplies	1,097,826	1,097,826	0		
8-Information Technology	30,706,505	30,692,057	-14,447	_	
9-Telecom	2,843,084	2,843,084	0		To O&M Expe
10-Marketing	131,439	112,828	-18,611		10 Odivi Expe
11-Directors, Sharholders & PR	5,654,890	5,654,890	0		
12-Dues & Donations	1,355,515	980,515	-375,000		
13-Printing & Postage	415,141	415,141	0		
14-Travel & Entertainment	716,735	716,735	0		
15-Training	606,960	606,960	0		
16-Outside Services	25,739,269	19,136,566	-6,602,703		
17-Provision for Bad Debt	0	0	0		
18-Miscellaneous & Unallocated Cost Center	-98,330,126	-100,163,250	-1,833,124		
Total	120,262,924	120,138,249	-124,675		

Jurisdiction	Total Depreciation	Tennessee Allocation	Tennessee Depreciation		
Tennessee Operations (Div 093)	16,953,381	100.00%	16,953,381		
/lid-States General Office (Div 091)	26,641	40.87%	10,888		
SU Customer Service (Div 12)	11,129,320	4.74%	527,530		
SU General Office (Div 02)	19,705,259	3.58%	705,448		
Gross Pro Forma Depreciation Expense			18,197,247		
Intercompany Leased Property Depreciation			267,601		
Depreciation Expense on Capitalized Incentive Compensation			-212,293		
Net Pro Forma Depreciation Expense			18,252,555		To Income Statem
ross Pro Forma Depreciation Expense			18,197,247		
est Period Depreciation Charged to Division 93			16,209,849		
Adjustment to Reflect End-of-Period Plant Levels			1,987,398		
et Pro Forma Depreciation Expense			18,252,555		
djustment to Reflect End-of-Period Plant Levels			1,987,398		
Net Pro Forma Depreciation Expense for Annual Revenue Recon	ciliation Calculation		16,265,157		To Rev Req-1 tab.

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Interest Expense on Customer Deposits

Item	Amount
Average Customer Deposits	1,069,120
Current TPUC Interest Rate on Customer Deposits	3.60%
Pro Forma Interest Expense on Customer Deposits	38,488

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008

Taxes Other Than Income Tax Expense

<u>Item</u>	Division 93	Division 91	Division 12	Division	Barnsley Storage Transfer	Total
1-Property Taxes	4,143,173	0	0	0	57,132	4,200,305
2-Gross Receipts Taxes	717,361	0	0	0	0	717,361
3-Payroll Taxes	211,953	153,393	136,084	220,425	0	721,854
4-Franchise Taxes	1,301,996	0	0	0	0	1,301,996
5-General Taxes	20,090	0	0	0	0	20,090
6-TPUC Inspection Fee	612,669	0	0	0	0	612,669
Total Taxes Other Than Income	7,007,242	153,393	136,084	220,425	57,132	7,574,276

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Other Workpapers

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Cost of Capital

End-of-Period

Classification	Percentage	Cost	Weighted Cost
Short-Term Debt	0.09%	28.15%	0.03%
Long-Term Debt	37.71%	3.83%	1.45%
Equity	62.20%	9.80%	6.10%
Total	100.00%		7.58%

Reconciliation

Classification	Percentage	Cost	Weighted Cost
Short-Term Debt	0.10%	28.15%	0.03%
Long-Term Debt	39.24%	3.83%	1.50%
Equity	60.66%	9.80%	5.94%
Total	100.00%		7.47%

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Uncollectible Expense Ratio

Item	Amount	Notes
Uncollectible Expense	250,728	
Gas Sales & Transportation Margin	89,445,000	
Total	0.002803	

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Pro Forma Amortization of Excess Deferred Income Tax Liability

Month	Amount
	•
June-23	-503,441
July-23	-503,441
August-23	-503,441
September-23	-503,441
October-23	-503,441
November-23	-503,441
December-23	-503,441
January-24	-503,441
February-24	-503,441
March-24	-24,168
April-24	-24,168
May-24	-24,168
Total	-4,603,469
	То
	Operating
	Results
	Tab

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Income Taxes at Proposed Rates

SOURCE: Company Schedule 8 and Schedule 8R.

	Schedule 8 End-of-Period	Schedule 8R Reconciliation
Item	Amount	Amount
Required Return	37,713,934	34,858,868
Current Return	35,052,165	35,238,631
Pre-Tax Deficiency	2,661,769	-379,763
Revenue Conversion Factor	1.342900	1.342900
After-Tax Deficiency from Current Return	3,574,490	-509,983
After-Tax Deficiency from Current Return	3,574,490	-509,983
Pre-Tax Deficiency from Current Return	2,661,769	-379,763
Tax Liability Increase	912,721	-130,221
Current Tax Liability	9,474,951	9,620,149
Pro Forma Income Tax Liability	10,387,672	9,489,928

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Return Calculation

SOURCE: Company Schedule 7 and 7R.

	Schedule 7 End-of-Period	Schedule 7R Reconciliation
Item	Amount	Amount
Addition		
Additions:	044 440 070	774 007 404
Utility Plant in Service	811,146,870	771,267,484
Contruction Work in Progress	11,714,042	17,457,782
Working Capital / Deferred Rate Case	2,529,959	2,529,959
Materials & Supplies / Gas Inventory	8,627,170	8,627,170
Intercompany Leased Property	5,985,565	6,122,272
Cloud Projects	119,181	121,029
Total Additions	840,122,787	806,125,695
Deductions:	220 670 500	240 270 462
	000 070 500	0.40.070.400
Accumulated Depreciation Deferred Pension Regulated Asset	238,679,580 17,184,326	240,278,162 20,240,723
Accumulated Deferred Income Taxes	, ,	, ,
	77,096,381	69,338,100
Customer Advances for Construction	20,280	20,280
Customer Deposits	1,069,120	1,069,120
Accumulated Interest on Customer Deposits	18,913	18,913
Capitalized Incentive Compensation	8,508,879	8,508,879
Total Deductions	342,577,479	339,474,177
Rate Base	497,545,308	466,651,518
Overall Rate of Return	7.58%	7.47%
Return	37,713,934	34,858,868

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Rate of Return Calculation

SOURCE: Company Schedule 10 and Schedule 10R.

Item	Schedule 10 End-of-Period Amount	Schedule 10R Reconciliation Amount
Total Revenues	202,484,006	200,828,272
Purchased Gas Cost	111,383,272	111,383,272
Operation & Maintenance Expense	21,617,865	21,617,865
Taxes Other Than Income Taxes	7,574,276	7,574,276
Depreciation & Amortization Expense	18,252,555	16,265,157
Federal & State Income Taxes	9,474,951	9,620,149
Interest on Customer Deposits	38,488	38,488
Allowance for Funds Used During Construction	-909,566	-909,566
Total Expenses	167,431,841	165,589,641
Return on Rate Base	35,052,165	35,238,631
Interest Expense	7,363,671	7,139,768
Return on Equity	27,688,494	28,098,863
Return on Rate Base	35,052,165	35,238,631
Rate Base	497,545,308	466,651,518
Rate of Return on Rate Base	7.05%	7.55%
Return on Equity	27,688,494	28,098,863
Rate Base	497,545,308	466,651,518
Equity Capital Percentage	62.20%	60.66%
Equity Capital	309,466,240	283,085,284
Rate of Return on Equity	8.95%	9.93%

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Income Tax Expense for Return Calculation

SOURCE: Company WP 10-1 and WP 10-1R.

Item	Tax Rates	WP 10-1 End-of-Period Amount	WP 10-1R Reconciliation Amount		
Total Revenues		202,484,006	200,828,272		
Purchased Gas Cost		111,383,272	111,383,272		
Operation & Maintenance Expense		21,617,865	21,617,865		
Taxes Other Than Income Taxes		7,574,276	7,574,276		
Depreciation & Amortization Expense		18,252,555	16,265,157		
Interest on Customer Deposits		38,488	38,488		
Total Expenses before Income Taxes		158,866,455	156,879,058		
Net Operating Income before Income Tax		43,617,551	43,949,214		
Less Interest Deduction		7,363,671	7,139,768		
Equity Portion Return		36,253,880	36,809,446		
Tennessee Tax Rate	6.50%	2,356,502	2,392,614		
Federal Tax Rate	21.00%	7,118,449	7,227,535		
Total Income Tax Expense		9,474,951	9,620,149		
Reconciliation Interest Calculation:					
Reconciliation Rate Base			466,651,518		
Reconciliation Weighted Short-Term Debt Cost		0.03%			
Reconciliation Weighted Long-Term Debt Cost		1.50%			
Reconciliation Weighted Total Debt Cost		1.53%	1.53%		
Reconciliation Interest Expense			7,139,768		

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Revenue Requirement - Atmos Format -1

SOURCE: Company Schedule 1 and Schedule 1R

ltem	Schedule 1 Amount	Schedule 1R Amount
Cost of Gas	111,383,272	111,383,272
Operation & Maintenance Expense	21,617,865	21,617,865
Taxes Other Than Income Taxes	7,574,276	7,574,276
Depreciation & Amortization Expense	18,252,555	16,265,157
Return	37,713,934	34,858,868
Income Taxes	10,387,672	9,489,928
AFUDC	-909,566	-909,566
Interest on Customer Deposits	38,488	38,488
Total Cost of Service	206,058,496	200,318,289
Revenue at Present Rates	202,484,006	200,828,272
Revenue Deficiency	3,574,490	-509,983
Amortization of EDITL	-4,603,469	
Reconciliation Revenue Requirement	-569,040	
Net Revenue Deficiency	-1,598,019	\
Carrying Cost		-59,056
Annual Reconciliation Revenue Requirement		-569,040

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Reconciliation Carrying Cost Calculation

<u>Item</u>	Rate	Amount	
Reconciliation Net Revenue Deficiency		-509,983	
Base Factor	1.0000		
Weighted Average Cost of Capital	0.0758		
Total Factor	1.07580		
Componded for 18 months	1.50		
Carrying Cost Applied Rate	1.1158	11.58%	
Reconciliation Carrying Cost		-59,056	 To Rev Req-1

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Working Capital Calculation

SOURCE: Company WP 7-5.

ltem	Rate		
Revenue Lag	37.50		
Expense Lag	32.95		
Net Lag	4.55		
Daily Cost of Service	556,598		
Working Capital	2,529,959	-	To "Rate Base" tab.

WHN Consulting ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Working Capital Expense Lag

SOURCE: Company WP 7-7.

ltem	Amount	Lag	Dollar Days		
Operating & Maintenance Expenses:					
Purchased Gas Expense	111.383.272	39.33	4.380.704.081		
O&M Labor	8.071.129	14.07	113.560.782		
O&M Non-Labor	13,546,736	29.43	398,680,441		
axes Other Than Income Taxes:					
Ad Valorem	4,200,305	241.50	1,014,373,711		
State Gross Receipts Tax	717.361	-151.50	-108,680,167		
Payroll Taxes	721,854	14.51	10,474,101		
Franchise Tax	1,301,996	37.50	48,824,852		
TPUC Inspection Fee	612.669	272.50	166,952,417		
DOT Fee	20,090	59.00	1,185,310		
ederal Income Tax:					
		07.50			
Current	0	37.50	0		
Deferred	7,118,449	0.00	0		
State Income Tax:					
Current	0	37.50	0		
Deferred	2,356,502	0.00	0		
Other:					
Depreciation	16,265,157	0.00	0	Equity Calculation:	_
Interest on Customer Deposits	38,488	182.50	7,024,115	Total Return under Proposed Rates	
Interest Expense - Long-Term Debt	7,214,407	91.25	658,314,639	Less Long-Term Debt Interest Expense	
Interest Expense - Short-Term Debt	149,264	24.05	3,589,799	Less Short Term Debt Interest Expense	
Return on Equity	29,440,698	0.00	0	Less AFUDC	
				Return on Equity	=
Total Cost of Service	203,158,377	32.95	6,695,004,081		
			.,,,		
Daily Cost of Service	556,598				

ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008 Correction of Allocation Factors

	2022 Allocation	n Factors Used	2022 Allocation F	2 Allocation Factors Corrected ate Base Jack Base O&M Expense 3.58% 3.58% 4.74% 4.74% 40.87% 40.87%
Division	Rate Base	O&M Expense	Rate Base	O&M Expense
Division 02 - Shared Service-General	3.90%	3.90%	3.58%	3.58%
Division 12 - Shared Service-Customer Support	4.74%	3.96%	4.74%	4.74%
Division 91 - Mid-States General Office	40.87%	40.87%	40.87%	40.87%

Hal.

The Div 012 rate of 4.74% is the rate calculated in our Fiscal 2022 allocation factor file and is the correct rate. Due to a mapping issue in our monthly close process between the subaccounts 9220-41131 (to allocate Div 012) and 9220-41132 (to allocate Div 002) the 41131 subaccount was understated, causing our O&M allocation factor to be calculated at 3.96% instead of the intended 4.74% for Div 012.

Also, subaccount 41132 was overstated causing our O&M allocation factor to be calculated at 3.90% instead of 3.58% for Div 02. The allocation rate from Div 02 for O&M can vary because it is calculated on a cost center basis based on the support provided by each cost center to the distribution businesses.

To quantify, SSU Div 002 billings to Div91 were \$10,529,984 * 40.87% = \$4,303,604, and SSU Div 012 Billings were \$5,722,768 * 43.10% = \$2,466,513, which total \$6,770,117 that **should have been** billed to TN, compared to actual billings of \$4,687,096 + \$2,062,097 = \$6,749,193, which means we **under allocated** O&M to TN by \$20,924.

We are working to correct this mapping issue between the subaccounts going forward.

Thanks, William

William D Matthews | Mgr Rates and Regulatory Affairs | Atmos Energy Corporation | 214-208-3637 Cell | William.Matthews@atmosenergy.com | www.atmosenergy.com

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From: William Novak <halnovak@whnconsulting.com>

Sent: Wednesday, March 22, 2023 11:54 PM

To: Matthews, William < William.Matthews@atmosenergy.com>

Cc: Yurova, Maria <Maria.Yurova@atmosenergy.com>; Victoria Glover <victoria.glover@ag.tn.gov>

Subject: [EXT] Re: Other Revenues in the ARM Filing

CAUTION: Don't be quick to click. This e-mail originated from outside of Atmos Energy. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks William, this helps me understand this.

While I've got you here, can you help explain another Item.

Division 12 has an allocation rate to Tennessee of 4.74% for Fiscal 22 for Rate Base allocations. However, Division 12 has an allocation rate to Tennessee of 3.96% for Fiscal 22 for O&M Expense allocations.

Why the difference? Divisions 2 and 91 have the same allocation factor for both Rate Base and O&M Expense.

Am I missing something?





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- 8	NAME OF THE PARTY	Ē	Territorial Territorial Territorial	=	Topic States Surfer States and	- 1			- 1	- 4		-0.00	- 47	- 2	- 4	2	2
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- 8	MARKED STATES	Ξ	Territorial Territorial	Ξ					- 1	- 1					- 1		
- 8	MARKET AND ADDRESS OF THE PARTY ADDRESS OF THE PARTY AND ADDRESS OF THE PARTY AND ADDRESS OF THE	Ē	Territoria Territoria Territoria	Ξ	THE REAL PROPERTY.				- 1	-	20	440	100	=	100	-	22
- 8	NAME OF THE PARTY	Ē	Territoria Territoria	Ξ	Tono barbara Contract				- 1	- 2	-00	-		- 2	- 2	- 2	
- 8	MARTINE MARTINE MARTINE	Ē	Party Anna Party Anna Party Anna	187	hode the factors	- 1			- 1	-	173	100	100	-	-	-	
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3	MANAGEMENT STATES	Ĭ	Miller Spills Miller Spills Miller Spills	700	Name of Street, Street			-3	- 1	- 3	1						4
i	MARTINE MARTINE MARTINE	Ξ	Minute Rights Minute Rights Minute Rights Minute Rights	=	Topic	200	200	2775 1070 1070	-	-	-	200	- 22	700	- 00	-	ai :
i	MARTINE MARTINE MARTINE	Ξ	Mineral Registre Mineral Registre Mineral Registre	700	ENGINEER TOURS ENGINEER TOURS MANAGEMENT TOURS ACCOUNTY TOURS	- 100	49	-	- 10	700	77	700	77	-	777	77	
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i	MARTINE MARTINE MARTINE	Ē	Marie Spile Marie Spile Marie Spile Marie Spile		Mark Street Street	-	-	-000		40.70		-		-	-	420	200
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i	MARTINE MARTINE MARTINE	=	Name of Street, Street	-	Section to Section to Section to	-		-	200		200	-70.70		-	-	-	200
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i	MANAGEMENT STATES	Ē	TORONO AND POSTO TORONO AND POSTO TORONO AND POSTO TORONO AND POSTO	Ē	Minimum many Manager Manager	-	-	-	7	7	12	-	12	7	3	1	-
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8	MARKET STATE	É	Marian and State Company	-	Najvenj Plac State Inchesio India Najvenj Plac State Inchesio India	100	200	=	-	- 22	-	- No.	-	=	-	=	-
-	MANAGEMENT STATES	É	Manager committee or the State of State	Ē	Report Planters Services Control	7	-	-	70	12	12	7	- 3	=	3	12	1
Ē	MARKET STATE OF THE PARTY OF TH	Ē	Territorio	=	Indicate the State of	100	7,00		77	77	100	700	170	77	77	=	
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-	MANTHE MANTHE		Modern verterary artists manufacture proper	-	Name and Address of the Owner o	730	-	-	-	-	2.00	730	- 100	-	-	77	

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Management Street, Str	Manager Contract of the Contra	Supplements Suppl	- 6	-	3	-	-	- 22	-	-	-	-	-	- 22	
STATE	The same of the sa	Topicon Topico	- 22	- 100	-	=	- 2	- 12	- 22	100	- 2	- 3	- 2	- 12	
Supran Supran	TO TOTAL STREET, STREE	N SECURISION	100	10 mg	=	-	-	27	100	10 mm	100	-	-	- 17	
Management Street		Name and Park	-	- 5	- 5	- 17	- 17	- 17	- 2	- 5	- 5	- 5	12	- 5	
Secretary Secret	The state of the s	Manager Co.	100		-	-		100	-		-	- 2	-	- 10	
BOOK STATE OF THE	The second secon	MANUFACTURE SAME	738	700	3	700	100	12	700	178	70	- 22	700	12	
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	The control of the co	Manager Park	100	170	- 2	- 22	12	120	100	- 22	ä	- 12	- 12		
Mary and Street	Manager and American	Appendix	(30 (30)	198	- 3	32	100	100	- CAR CAR CREAT	198	32	- 22	- 32	100	
MARTINE MARTINE MARTINE	Managar and American	turbushness turbushness turbushness turbushness	- 42		- 2	-2	- 2	- 2	-22	-0	- 22	- 2	- 2	- 2	
	See Manipart Calministration (Manipart Calministration) (Manipart Calminist	national community of the community of t	400 400 400	100	-	-	-	-04 -07 -07	400 400 400	100	100	3	2	200	
MARTINE MARTINE MARTINE	TO TOTAL STREET, STREE	Terrender Terre	100	- 100	- 22	170	170	1.00	100	- 22	77	- 17	170	1.00	
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MARTINE MARTINE MARTINE	The control of the co	Name of the State	-	- 2	Ξ	- 2	-	- 22	-	- 2	=	3	- 12	- 22	
SUPPLIES STATES	Manager of the same of the sam	Supplemental and the supplemen	-	-		22	- 52	27	-	-	-	22	- 52	27	
BOOK STATE OF THE	Manager construction in	home For here	488	400	-07	48	48	49	400	400	400	-07	400	49	
MARTINE MARTINE MARTINE	Manager of the same of the sam	Name of the lates			=	-	=	-2			-	-	-	-2	
MARKET STATES	Manager contract and the second	Supplied Final States Supplied Final States Supplied Final States	-2	- 22	-	-2	2	-2	2	-2	700	-2	2	-2	
Mary Company Mary Company Mary Company	Manager control of the control of th	Appendictions Included the force Included the force	773	793	- 2	2	2	- 22	777	770	72	- 22	2	- 22	
Service Color Se	THE STATE OF THE STATE OF		1000	100	1,000	-	-		UPUR	00/E	1,000	-	100	100.00	-
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District Con-	The second secon	PARTIES TON	790 790	200 200 200	100	200	100	7.00	200	200 200 200	-	- 2	100	22	
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	A CONTROLLED CONTROLLE	THE PARTY OF				Total Control		100.00	1000	200	2.400	1000 1000 1000 1000 1000 1000 1000 100	100	100	1
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Marine State Co.		Managery Witehing	-	-	-	-	-		-	-	-	-	-	-	
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Market State	Manager Colonia Coloni	Today Taris Maria M Today Taris Maria Maria Today Taris Maria Maria Taris Maria Mari	-	70,07	-5100	700	A7000	40,00	-	-	400	-55	47		į
M. Administration of the Co. St. Co. S	THE RESIDENCE OF THE RE	Topical time	107 1073 1076	107	100	-	-	- 22	170 0,00 0,00	100	100	- 22		- 22	
District Section		The state of	-	-	2	12	- 5	120	100	100 M	7	17	1	12	
M. Ann and Warts M. Ann and Warts M. Ann and Warts M. Ann and Warts M. Ann and Warts	THE SECTION AND ADDRESS OF THE SECTION ADDRESS OF THE S	CONTRACTOR OF	- 22	100	-	- 170	- 100	450	400	400	-	- 22	=	100	
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M. San San S. Marin. M. San San S. Marin. M. San San S. Marin.	THE PROPERTY OF THE PROPERTY O	Description of the	-	- 3	- 3	-	- 3	- 3	- 3	- 3	- 3	- 3	- 3	-	
District Park	THE PROPERTY OF THE PROPERTY O	Toppole Hopp Hop	- 1	- 1	- 1	- 1	- 1	- 1	- 1	- 1	- 1	- 1	- 3	- 1	
District Control Contr	THE RESIDENCE OF THE PERSON OF	To bear topics To begin the common of the co	100,000	100,000 Fig. 60 5,000	1,07,00	100	100	100	100,00	100,00	1000	-	1000	77.7	
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Management of the last of the		MARINE MARINE	77.0	100		-		777	470	200	777	777	700	22	
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			22	ä	- 2	-22		200	-22	- 100	-22	-22	-	22	
M. Administration of the Co. St. Co. S	E September 1	1000011000	- 25	-	-	400	-10	- 12	400	410	-	-25	-12	-0.00	
M. And Annual Physics M. Annua					á			-22	-	475	-	-22		-	
D. Construction of the Con	Total	Topic State of Title of The	40	- 22	- 2	-100	100	100	490	493	-10	- 27	- 22	- 22	
M. San San Parks M. San San Parks M. San San Parks	Total S		- 3		- 1				- 1	- 3	- 3	- 1	- 3	- 3	
M. Annual March 19, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10	Tarigani I	Opening and total	- 1	- 1	- 1	- 1	÷	÷	÷	- 4	- 4	- 4	÷	- 4	
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M. Add South Works		March & Secretary (1)	-	80,00 80,00 40,00	-	F1/50 F1/50	1900	70.00	79,89	171,000	100	-	-	-22	
M. Carrier Ports M. Carrier Ports M. Carrier Ports	Today Suran	Martin Agent Printing Marting Agent Printing Marting Agent Printing	-		-	100	-	100	100	1,00 10,00 10,00	-	-			
M. Concession of	E SURFERING ST	Miller and Miller and	100	Lane Com	-	70.70	100	100	1000	107	700	100	-	7	
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			190		1000	-000	1,000	1000	1,000	100.00	1966	-	1000	1000	1000	100.00	-
M System			1700	Military and Services	-	-	-	-	-	-	-700	-	-	-	-	-	
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	-	Married Rollins	755	ENGINEERS TO SERVICE OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN		- 4	- 6		-	-70		- 10	-			-	
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T TOTAL	-	According to the last of the l	700	ENGINEER .	100	100	100	200	100	100	100	100	200	200	-	2.00	- 20
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			PRINC.	Balantan Tarry	- 17	- 1			-	-42	- 1		-70			-42	- 42
M Nymerous		Account Pages	700	Account Paper Transport	-7487	470	-	-0.00	-	-0.00	-000	479	-	-97500	-0.00	-0.00	-70,00
M STATUTE					-	100	197	100	-	150	100	198	- 178	198		1.90	1.00
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				NAME AND ADDRESS OF THE PARTY O			-7500			-		-				-	
DE PROPERTY.	-	Facilities regards.	m		-1984	7,94	-694	-	100	-0.00	-000	400	-675	100	-00	-04	700
M. Appellant	-	The street	-	THE TAXABLE PARTY.		- 1	- 4	- 1	- 2	- 2	- 2	- 1	- 2	- 1	- 1	- 1	-
T TOTAL	-	Ten artist	ALC:	Name of Street	-01	450	-	-00	-00	-0.00	-000	-0.00	-	- 22		-0.00	- 40
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M Property		Taxables Taxables	-		- 1	- 2				- 7	- 2	- 7	- 2	-	- 7	- 1	- 1
M Printers	- 63	Tax or other tax o	177	Statements	-797	-798	- 60	- 62	- 42	-0.00	400	449	- 6	- 60	400	-0.00	- 40
M. Symbol		Taxables Taxables	-	Cody Sea To	467	434	738	-	-	100,000	400	441	ART	408	-	- 4.00	- 40
					-		-000		-176	-0.00	460	446	-	-07		- 100	
the Particular Control		Taranta .	177	10.00.00 0.00.000	-	448	-	-00	-	20.00		-0.00	-0.0		.000	48	-
DE PROPERTY.	-	Modern cold discount of the	1760	Substantiana est	-000	-	-000	400	40.00	48.85	40.00	40,04	-0798	-000	4800	40.00	-
M Symbol	-	Residence or all all and addressed	170		400		-		-	-	-	-	-	-	-	-	-
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M. Sympan			- 170		-700	-0.00	- 100	400	-00	40.00	-0.00	45.65	-000	-000	-000	-00.00	
1000	=	Might of Tables on Total	1700	All had been	200	-	-	- 22	- 270	200	-	777	- 75	-0.75		-0.00	-
			1700		470	479	- 470	49	-470	4.96	470	479	-076	47	470	4.76	4.70
M. Special	-	THE ARRIVATION .	100	Name and Post Post Colors		-	-				-	-	-	-		-	
M. Paradiana	-	The Administra	-	10.000	-1707	400	4000	-	4900	-070,700	-0000	-	4,000	4000	4300	-000,00	470
M Name and		Annual Adversaria Car. The	-	ACCRECATE THE REAL PROPERTY AND ADDRESS OF THE PARTY AND ADDRESS OF THE	4000	400	4,000	190.00	1000	-00.00	Artist	ACCOR	4,000	ARREST .	AMERICA	400,00	49.5
M. Paradiana		AND SAN ASSESSMENT OF THE PARTY	=	Secretary Secretary Secretary	200	2.00	400	-	-	7875	777	7778	-	0.75	4.70		
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M Nicolana	-	Total de servicios	-	Trade (Table)	100	-	-	-	-	-	- 2	-	-	-	-		-
T TOTAL		Total de la company	-	Mathematiq map	-	-	-	-	-	-	-	-	-	-	-	-	-
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1 1000	-	Particular participants	170	Name a Report	-798	- 198	- 12	-176	-176	-176	-176	-0.00	-776	-176	-076	-176	- 49
	-		-		AMERICA	-000,000	-0.000	ARREST	ARREST	400.00	AMERICA	-000,000	-	ARREST	AMOUNT	-000.00	400.00
M. Specimen	-	AND PART SOURCES	-	Service Cod.	1000	100	200	2000	100	1,00	1000	100	200	200	1000	1,00	1.0
M. Special		Party Area?	-	MANUFACTURE STATE OF THE PARTY	197	700	-	100		7.00	200	7,00	100	100		100	-
2 1000		Party Street Party Street Brothers Minister	=	NA PAGE AND ADDRESS OF THE PAG				-	-		207		- 2			- 12	
as allegan	-	Modern Morrison	170	No. Contractor	400	-0.00	400	-	-	200	-	776	-000	-	- 600	-0.00	
M Symbol																	
M. Synchols	-	Might an hybride. Next	-	All factors	-	-	-	400	-000		-0.00	- 170	-09	-09	1/5	- 100	
M. Principles	-	Secure Spires	780	Partie members	200	200	903									200	80
	-	Total Aller and Control	100		200	7.00	-	200	200	244	200	200	-	200	200	2.00	
M System	-	TORREST AND STORY	=	Reserved the Nove	100	100	100	200	75	7.00	100	100	700	77	27	7.00	
M Nimber	- 22	Total designation of the last	-	Management and	1000	75.00	1100	1500	7000	10.00	7569	10.00	1500	1500	1500	19.00	70.00
M. Specials	- 100	Total de la company	-	National Control	499	777	100	000	-000	200	100	700	-000	-000	- CO	7/0	- 00
T TOTAL																	
a since	-	And Park Spices	-	Name of the State of		-	4,97,00	-	490,00	-	-	-00.00	4,97,00	-	490,00	-000,00	
	me	AND DAY OF STREET, STR	-	Parties City Texas	- 481	700	-	-	-	-	-	700	-	-	-	-	7.0
		ACCUPATION AND ADDRESS OF THE PARTY AND ADDRES	-	Supply Flor Stock				- 000	-100	-0.00	-188	- 100	- 100		- 100	-0.00	- 100
M System																	

WHN Consulting
ATMOS ENERGY CORPORATION - ARM RECONCILIATION - 23-00008
Trial Balance - Kentucky Mid-States - Income Statement Accounts

SOURCE: Company Filing. "SSU & KMD Detail Trial Balance". "KMD Income Statement Accounts" tab.

Division	Division Description	Account	Account Description	Sub Account	Sub Account Description	OCT-21	NOV-21	DEC-21	JAN-22	FEB-22	MAR-22	APR-22	MAY-22	JUN-22	JUL-22	AUG-22	SEP-22	Total
093	Tennessee Division	4880 Miscel	llaneous service revenues	31301	Misc Service Revenue	-4,860	-4,576	-6,152	-5,432	-5,440	-5,612	-5,232	-5,720	-5,923	-5,333	-7,784	-6,494	-68,558

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Ē	Resiliente face (Ma Resiliente face) (Ma Resiliente face) (Ma	SS Sacharanananananananananananananananananana	Ξ	Securities Securities September Securities September September	100	100	100	100		12		100		100		10	100
Ē	Resiliente leure Min Resiliente leure Min Resiliente leure Min	THE PERSONNEL PROPERTY AND ADDRESS OF THE PERSONNEL PROPERTY ADDRESS OF THE PERSONNEL PROP	77	Popular hand Sold feets record Sold feets record Sold feets record	-	1907	1900	17.0	77	100	1000	1970	1000	1000	100		
Ē	Section Section Sectio	M topological	-	Market Total	- 22	22	- 22	-	12	- 12	72	-	-		12	- 12	70
Ē	Sentence have the Sentence have the Sentence have the	THE CONTRACTOR OF THE CONTRACT	700	Market Topic North Market Topic Market Topic Topic Colleges		100	100	200	900	100	-	100	100	200	-	200	
Ē	Seaffering hours the Seaffering hours the Seaffering hours the	M hadadaanigajaa M hadadaanigajaa M hadadaanigajaa	100	TOTAL	000	-000 A,000 1000	400	400	400	400	-000	4,000	A7000	A. 10.00	400	400	400
Ē	Sections bearing Sections bearing	THE STATE OF THE S	-	Married States States	200	100	100	100	170	100	1000	120	100	1,000	170	100	100 100 100 100 100 100
ŝ	Name and Address of the Address of t	THE CONTRACTOR OF THE CONTRACT	-	Management of the Control of the Con	700	A.000	200	770		1000	1,000	1000		1,750 1,750 40,000	1.00		100,10 100,10 100,10
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Ē	Residence bear the Residence bear the Residence bear the	THE PROPERTY OF THE PROPERTY O	20	Marchings Space Statisticals: The Security Space	100	14.00	10.00	18.00	10.00	100	V-100	1000	10,000	4 10 10		4718	10.00
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Ē	Residence bear the Residence bear the Residence bear the Residence bear the	Mr. Company of the Co	-	ATTACON TO THE	100	191,000	100,000	10000	THE PERSON	100,000	THE PERSON	1,000	100,00	1000	THE PERSON	1,700,000	1,50,00,00
ŝ	Name and Park		=	TANTON PROPERTY TANTON PROPERTY TANTON PROPERTY	-	100	700	-	- 77	-		-	100	100	-	-	-
Ξ	Residence beautiful Secretaria beautiful Secretaria beautiful	10 to	-	Control of the Part of the Par	100	1,000 1,000 1,000 1,000	1000	120	100	100 M	Application of the last of the	1,000	1,000 0 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0 0,000 0 0,000	100.No	URN.	170.00	100.00
Ē	Residence boarding feedbacks boarding feedbacks boarding	M Maryamana M Maryamana M Maryamana	Ξ	Managed Administrator had Transporting Report Sciences Photografiles Report	- 55	- 22	100	-	- 55	- 55	-	-	- 12	-	-	-	- 22
Ē	Section Section Sectio	Managery and comments	Ē	CATALON CONTRACTOR	100	700	707	100	787	700	722	777	722	177	455	2	725
Ē	Residence beautiful Residence beautiful Residence beautiful Residence beautiful	M Marine State	-	NAME OF THE PARTY	100	100	100	100		100	100	100	100	100	100	100	
ŝ	Residence town the Sections town the Sections town the Sections town the	Marine State		THE RESIDENCE OF THE PARTY OF T	-	-	200			- 1	-		700	-	-	-	-
Ē	Residence Securities Securities Securities Securities Securities	Marine State	-	Mariana Ma Mariana Ma Mariana Mariana Mariana Ma Ma Mariana Mariana Ma Ma Ma Ma Ma Ma Ma Ma Ma Ma Ma Ma Ma	1800	100	1000	1000	100	190.00	A SEC.	170.0	100.00	1000	LONG TO LANS TO	100.00	100.00
Ē	Sealth and Sealth Sealt	M STATES CONTACT M STATES CON	-	Southern Street	270		100		-5	-	10.00	-	100	700	-		1,00
Ē	Sentence have the Sentence have the Sentence have the Sentence have the	W Statement Comments	700	Minima has been and their books and self-books and			100					100	-			-	
Ē	Residence bear the Residence bear the Residence bear the	W Statement College	700	TO STATE OF THE PARTY OF	- 2	- 1	100	=	-	-	-	- 3	100	-	-	12	- 12
Ē	Number of State of St	M STATES CARDO	-	Papped Spinisher Marketon	- 1	- 1	- 1	- 1	- 3	- 3	- 3	-	- 1	- 1	- 3	- 1	- 3
ŝ	Section Section Sectio	M Nation (MAN)	200 200	Special Sections Special Sections Supposes Supposes Supposes	- 2	- 2	170			- 2	- 2		-	-	- 2	- 2	-
Ē	Sections for the Sections for the Sections for the	W STATES CONTROL OF THE PARTY O	22	Total Company	- 3	- 1	- 3	- 3	- 3	- 5	- 2	- 3	- 3	- 1	- 5	- 5	- 2
Ē	Residence bear the Residence bear the Residence bear the Residence bear the	Total Control	=	Street, Street, Superfrage Str. Superfrage Street, Superfrage Street, Street, Superfrage Street,	-		-	-				-	17.50 18.50 4.50		-		100
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Ē	Residence have the feather a have the feather a have the feather a have the	THE PRODUCTS OF THE PRODUCTS	-	Front Fridge St. For Wing Front Fridge Sar Fright Sudan San San Fright States San San	100	100	100	-	100	100	100	100	100	100	198	- 33	100
Ē	Season to the Season State Season Sea	TO PRODUCE TO STATE OF THE PERSON OF T	=	Population of the Control of the Con	100,00	1000	1,000	-	7.0		- 22	000		1000	100		200
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Ė	Resilient best the Resilient best the Resilient best the	Michigan Andrewson Michigan Andr	100	Project Performing State County, State County State County, State County, State County, State County, State County	190,00	1918		100		****	1000	-		-		-	-
į	Anadorea Securities Securities Securities Securities Securities Securities Securities	Marting Andrews Marting Andrews Martin	-	Property Page Trans that Page Shared Page Trans And the Page Shared Page	=	700	=	20	200	17	=	200 200 200	=	-	E	=	- 12
Ĩ	Sections have the	ST THE THE PERSON NAMED IN	170	Marine Specification	100	12	170	100	100	10	-	17	- 2	100	-	12	100
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Ē	Southern bear the Southern bear the Southern bear the	Markette San Markette San Markette San Markette San Markette San Markette San	-	ST Security That Topic State S	100 100 100	22	22	20	20	20	-	100 M	-	11.00 10.00 10.00	-		20
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Ě	Sections have the Sections have the Sections have the	Total Control	-	Topic Books I Topic Global	- 22	- 1	- 2	-	-	- 2	-	-	- 12	- 22	- 2	- 12	100
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Ē	November of the November of th		1	Topic State Control of Topic Control of	100	1	2	3	- 3	- 2	3	i	-	- 2	100	12	- 12
Ξ	Residence beautiful Sections beautiful Sections beautiful	W Dark Land	-	NAME OF TAXABLE PARTY.	- 22	- 2	- 12	-	- 10		-10	- 22	- 12	-00	-400	- 11	4.00
Ē	Resilients bear the Sealtenes bear the Sealtenes bear the Sealtenes bear the	W National W National W National	=	Topic Conference on the Confer	- 2	- 2	- 100	-		-00	- 12	- 2	-	47	=	- 22	400
Ē	Residence bear the Residence bear the Residence bear the	W Navigation	=	Topic States Co.	- 8	- 1	- 1	- 1	- 1	- 1	- 1	- 1	- 1	- 1	- 1	-	-
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Ē	Sections bearing	W New York	100	South Control Control South Control Control South Control Control	- 8	- 8	- 3	- 3	-	- 1	- 3	- 1	- 2	-	-	- 12	17
ŝ	Name and Park		=	Rodrick Tools	á	-	-	-		-	-	-	- 2	i	á	-	-
Ē	Sentence have the feedback for the feedb	The same of the sa	-	Equipment First Minarian Equipment of Minarian South Colonial States	77	- 1	- 2	-	78	- 1	-	- 7	- 2	-	=	100	
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