

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

IN RE:)
)
PETITION OF ATMOS ENERGY)
CORPORATION FOR APPROVAL)
OF A TENNESSEE HEDGING) **Docket No. 23-000026**
PROGRAM)

NOTICE OF FILING

Atmos Energy Corporation hereby gives notice of filing the attached revised Proposed Tariff Sheet No. 43.1. A prior version was attached as Exhibit SMA-1 to the Pre-Filed Testimony of Shawn M. Audibert. The changes from the original Exhibit to this revised version have been redlined in another version that is also attached to this notice of filing.

Respectfully submitted,

Sims Funk, PLC

By: 

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Counsel for Atmos Energy Corporation

REVISED EXHIBIT SMA-1
(CLEAN COPY)

ATMOS ENERGY CORPORATION

HEDGING ACTIVITIES

The Company may engage in hedging activities and recover those costs through the Purchased Gas Adjustment (PGA) Rider/Actual Cost Adjustment (ACA) Mechanism. Costs related to hedging transactions may be recovered through the ACA account; provided, however, that such costs recovered through the ACA account shall not exceed a predetermined budget. The hedging transaction budget shall be \$4.0 million per winter season.

Hedging transactions, as used herein, shall include but not be limited to futures contracts, financial derivative products such as swaps, options, or other private agreements to hedge, manage or stabilize gas costs.

Costs related to hedging transactions recoverable through the ACA account shall be defined as all direct, transaction related costs arising from the Company's prudent efforts to stabilize or hedge its commodity gas costs including, without limitation, brokerage fees, and the costs of financial instruments. All costs related to hedging transactions, in addition to all gains and losses from hedging transactions, shall be credited/debited to the ACA after the hedging transaction closes and in the applicable winter month. Costs related to hedging transactions that are incurred prior to the month that the hedging transaction closes shall be temporarily recorded in a separate, noninterest-bearing account for tracking purposes.

The following types of financial instruments, either at the market, or out of the money, may be used to effectuate hedging transactions:

- Swaps (NYMEX or an appropriate market index)
- Upfront premium call options (NYMEX or an appropriate market index)
- Deferred premium call options (NYMEX or an appropriate market index)

Hedging transactions may be entered into beginning April 1st each year for the two upcoming winter seasons. Hedging transactions may hedge up to 50% of expected natural gas purchases for the upcoming winter season and up to 25% of expected natural gas purchases for the winter season following the upcoming winter season. Expected natural gas purchases are defined as winter normal requirements less expected storage withdrawals.

The Company shall make an annual presentation, prior to April 1st each year, to Commission Staff and the Consumer Advocate Division of the Office of the Tennessee Attorney General regarding the performance of its current winter Hedging Activities, as well as the status of hedges for the upcoming two winter seasons.

REVISED EXHIBIT SMA-1
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