

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>ATMOS ENERGY CORPORATION</b>	)	
<b>TENNESSEE DIRECT, KENTUCKY/MID-</b>	)	<b>DOCKET NO. 23-00050</b>
<b>STATES DIVISION, AND SHARED</b>	)	
<b>SERVICES UNIT DEPRECIATION STUDY</b>	)	

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**PETITION TO INTERVENE**

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The Consumer Advocate Division of the Office of the Attorney General (“Consumer Advocate”), by and through Jonathan Skrmetti, Attorney General and Reporter for the State of Tennessee, pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Public Utility Commission (“TPUC” or the “Commission”) to grant the Consumer Advocate’s intervention into this proceeding because consumers’ interests, rights, duties, or privileges may be determined or affected by the *Atmos Energy Corporation Tennessee Direct, Kentucky/Mid-States Division, and Shared Services Unit Depreciation Study* (“Petition”) filed by Atmos Energy Corporation (“Atmos” or the “Company”). The Consumer Advocate would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utility services by initiating and intervening as a party in proceedings before the Commission in accordance with the Uniform Administrative Procedures Act and Commission rules.

2. Atmos is a corporation organized and existing under the laws of the state of Texas and Virginia and is engaged in the business of transporting, distributing, and selling natural gas in Tennessee. The Company’s principal place of business is located at 5430 LBJ Freeway, Suite

1800, Dallas, Texas 75240.

3. On June 29, 2023, the Company filed its depreciation study and petition for approval of depreciation rates. The Company also filed the direct, expert testimony of Ned W. Allis along with its Petition.

4. The Company notes in its Petition that it will seek to implement these depreciation rates as soon as they are approved and roll them into the revenue requirement recoverable from Tennessee consumers in their next Annual Review Mechanism filed on or before February 1, 2024.<sup>1</sup>

5. As stated in the accompanying testimony, the Company's Depreciation Studies results in an increase of at least approximately \$823,000 in depreciation expense for the Tennessee Direct Property.<sup>2</sup>

6. Consumers' interests, including without limitation the proposed increase in rates to be paid by consumers as a result of the Petition, may be affected by determinations and orders made by the Commission with respect to: (i) the interpretation, application, and/or implementation of Tenn. Code Ann. § 65-5-103(a), and other relevant statutory and regulatory provisions; (ii) the review and analysis of the documentation, financial spreadsheets, and materials provided by Atmos Energy; and (iii) the interpretation, application, and/or implementation of the terms and conditions of the Commission's Orders in TPUC Docket Nos. 14-00146, as well as the related settlement agreements as applicable in that docket.

7. Only by participating in this proceeding can the Consumer Advocate carry out

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<sup>1</sup> *Atmos Energy Corporation Notice of Filing Depreciation Study and Request for Approval of New Depreciation Rates*, at 1, TPUC Docket No. 23-00050 (June 29, 2023).

<sup>2</sup> *Direct Testimony of Ned W. Allis, Vice President Gannett Fleming Valuation and Rate Consultants, LLC on Behalf of Atmos Energy Corporation*, at 4, lines 13-14, TPUC Docket No. 23-00050 (June 29, 2023).

its statutory duty to represent the interests of consumers.

WHEREFORE, the Consumer Advocate respectfully requests that the Commission grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,

  
**JONATHAN SKRMETTI** (BPR No. 031551)

Attorney General and Reporter  
State of Tennessee



**VICTORIA B. GLOVER** (BPR No. 037954)

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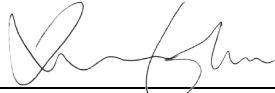
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**CERTIFICATE OF SERVICE**

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

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Email: [elybeck@simsfunk.com](mailto:elybeck@simsfunk.com)

This the 1st day of August 2023.

  
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**VICTORIA B. GLOVER**  
Assistant Attorney General