

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

<b>IN RE:</b>	)	
	)	
<b>ATMOS ENERGY CORPORATION</b>	)	
<b>FOR APPROVAL OF ITS 2024 ANNUAL</b>	)	<b>DOCKET NO. 24-00006</b>
<b>RATE REVIEW FILING PURSUANT</b>	)	
<b>TO TENN. CODE ANN. § 65-5-103(d)(6)</b>	)	

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**ATMOS ENERGY CORPORATION'S FIRST DISCOVERY REQUEST  
TO THE OFFICE OF THE TENNESSEE ATTORNEY GENERAL, CONSUMER  
ADVOCATE DIVISION**

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To: Office of the Tennessee Attorney General  
Consumer Advocate Division

Pursuant to TPUC Rule 1220-01-02-.11, the Tennessee Rules of Civil Procedure, and the Commission's March 6, 2024 Order Establishing Procedural Schedule, Atmos Energy Corporation ("Atmos Energy" or the "Company") serves the following First Set of Discovery Requests.

**Docket No. 24-00006**  
**Atmos Energy Corporation, Tennessee Division**  
**Atmos Energy DR Set No. 1**  
**Question No. 1-01**  
**Page 1 of 1**

**REQUEST:**

Please provide all formulas, excel spreadsheets, and workpapers supporting Mr. Novak's calculations resulting in the \$19,282,107 revenue deficiency, as set forth in page 11 of his pre-filed testimony.

**ANSWER:**

**Docket No. 24-00006**  
**Atmos Energy Corporation, Tennessee Division**  
**Atmos Energy DR Set No. 1**  
**Question No. 1-02**  
**Page 1 of 1**

**REQUEST:**

Admit or deny that the Company's calculation of the Forfeited Discount Factor using Revenue is in compliance with the Approved Methodology resulting from Docket No. 18-00112. 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.

**ANSWER:**

**Docket No. 24-00006**  
**Atmos Energy Corporation, Tennessee Division**  
**Atmos Energy DR Set No. 1**  
**Question No. 1-03**  
**Page 1 of 1**

**REQUEST:**

Admit or deny that the Forfeited Discount rate of 1.0971% from Docket No. 14-00146 proposed for use at page 8 of Mr. Novak's pre-filed testimony is based upon total margin. If you deny this statement, please provide your factual basis for doing so, including an explanation for Paragraph 10 of the Settlement Agreement filed in Docket No. 18-00112.

**ANSWER:**

**Docket No. 24-00006**  
**Atmos Energy Corporation, Tennessee Division**  
**Atmos Energy DR Set No. 1**  
**Question No. 1-04**  
**Page 1 of 1**

**REQUEST:**

Admit or deny that the rate design in ARM filings between base charge and volumetric charges is formulaic per the Approved Methodologies. If you deny this statement, please state in detail what you contend the rate design between base charge and volumetric charges should be, and identify all the portions of all past ARM filings, if any, using that rate design.

**ANSWER:**

Respectfully submitted by,



Erik Lybeck, BPR# 35233

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*Counsel for Atmos Energy Corporation*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing in PDF format was served upon Shilina Brown, counsel for the Consumer Advocate, at [shilina.brown@ag.tn.gov](mailto:shilina.brown@ag.tn.gov) on April 9, 2024.

