

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

IN RE:)
)
ATMOS ENERGY CORPORATION)
FOR APPROVAL OF ITS 2026 ANNUAL RATE) **DOCKET NO. 26-00009**
REVIEW FILING PURSUANT TO TENN.)
CODE ANN. § 65-5-103(d)(6))

**CONSUMER ADVOCATE’S THIRD SET OF DISCOVERY REQUESTS
TO ATMOS ENERGY CORPORATION**

This Third Set of Discovery Requests is hereby served upon Atmos Energy Corporation (“Atmos Energy” or the “Company”), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Regs. 1220-01-02-.11. The Consumer Advocate Division of the Tennessee Attorney General’s Office (“Consumer Advocate”) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Shilina B. Brown, on or before Thursday, April 2, 2026.

PRELIMINARY MATTERS AND DEFINITIONS

This Third Set of Discovery Requests incorporates by reference the same Preliminary Matters and Definitions as outlined in the Consumer Advocate’s First Discovery Request to Atmos, are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

THIRD SET OF DISCOVERY REQUESTS

3-1. According to the National Transportation Safety Board (NTSB) report,¹ DNV GL, a global risk management firm, now known as DNV, was the service contractor for Atmos Energy's Risk Assessment model. Is DNV still providing the service?

RESPONSE:

3-2. In the report, Section 2.0 Integrity Management Program, Atmos Energy told the NTSB there was no formal documentation that describes how the DNV relative risk model works. Is this still the case today?

RESPONSE:

3-3. If there is formal documentation from DNV that describes how the relative risk model works, who within the Company is the expert on this process and do they have a verification process which provides assurance that the model output accurately reflects the specific risks for the Atmos Energy IM regions? If there is no formal documentation from DNV, how does Atmos Energy know and/or verify that the model output accurately reflects the specific risks for the Atmos Energy IM regions?

¹ National Transportation Safety Board, Office of Railroad, Pipeline and Hazardous Materials Investigations, Integrity Management Factual Report, November 8, 2024.
<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKewiCvfTirbmTAXUBI2oFHe6gOvgQFnoECB8QAQ&url=https%3A%2F%2Fdata.nts.gov%2FDocket%2FDocument%2FdocBLOB%3FID%3D18187046%26FileExtension%3Dpdf%26FileName%3DIntegrity%2520Management%2520Factual%2520Report%2520-%2520Jackson%2520MS%2520PLD24FR003-Rel.pdf&usg=AOvVaw1f8ghL4vqtyJOPcOxsFeDr&opi=89978449>

RESPONSE:

- 3-4.** If Atmos Energy believes that the data from the model accurately reflects the specific risks for the Atmos Energy IM regions, is that data shared with the IM region operational managers for their use in planning and budgeting? If not, why has Atmos Energy decided not to provide that data to IM region operational managers?

RESPONSE:

- 3-5.** In the NTSB report, changes were made in Mississippi related to leak survey, and the re-evaluation time frame of Grade 2 and 3 leaks. Were those changes made throughout the Atmos Energy properties or only in Mississippi? If only in Mississippi, did the remainder of Atmos Energy properties remain at the minimum requirement stated in the Federal regulations?

RESPONSE:

- 3-6.** In the NTSB report, the time frame for repair of Grade 2 and 3 leaks was also changed. Respond to the following:
- a. Were those changes made throughout the Atmos Energy properties or only in Mississippi?
 - b. If only in Mississippi, did the remainder of Atmos Energy properties remain at the minimum requirement stated in the Federal regulations?

RESPONSE:

3-7. According to Atmos Energy, training is occurring everyday throughout the Atmos Energy properties related to the DIMP and specifically Operator Qualification and Safety.

Respond to the following:

- a. How many qualified trainers does Atmos have in, or available to, Tennessee?
- b. Are third party trainers used in this process?
- c. If yes to b. above
 - i. What is the name of the company?
 - ii. What specific DIMP and OQ areas do they provide training?
 - iii. What specific DIMP and OQ areas do Atmos Energy trainers provide.

RESPONSE:

3-8. How many employees does Atmos Energy have in Tennessee that require training on the DIMP, Operator Qualification and Safety issues raised in CA DR No. 3-7 above?

RESPONSE:

3-9. Does Atmos Energy conduct the DIMP and OQ training for third party contractors that provide service to Atmos Energy?

RESPONSE:

3-10. Refer to the DIMP, Section 8, Item 4, p. 44. It states that Atmos Energy will make a copy of its DIMP available to Federal and/or State regulatory authorities upon request and as required subject to code, law or act. Has TPUC requested or been provided with a copy of the DIMP?

RESPONSE:

3-11. Refer to the DIMP, Section 8, Item 5, p. 44. It states that communication of changes to the plan will be made to State regulatory authorities as required subject to code, law, or act. Does Atmos Energy inform TPUC when changes are made to the DIMP?

RESPONSE:

3-12. Confirm or deny that one of the goals of Customer Advances for Construction provisions in the tariff is to ensure that installations for new customers do not pose an undue cost burden for legacy customers. Provide a narrative explanation of your response.

RESPONSE:

3-13. Refer to Atmos Energy's Tariff, Sheet 67 and the Company's Response to Consumer Advocate DR No. 1-19. Explain how the Company's existing tariff language is related to service lines coupled with the manner in charges for excess footage (refer to CA DR No. 1-19 response) sufficiently protects Atmos Energy's existing customer base from

significant negative cost implications from adding new customers. Provide the underlying analysis supporting the conclusions reached in this response.

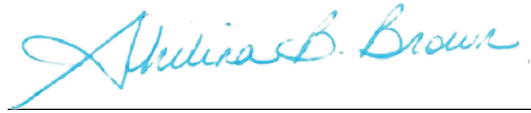
RESPONSE:

3-14. Refer to the Company's CONFIDENTIAL Response to Consumer Advocate DR No. 1-16 (Supplemental) and provide the following:

- a. Provide the underlying calculations supporting the Aid-in-Construction amount contained in this response.
- b. Provide the underlying estimated cost of this project split between the following:
 - i. Installation of Mains, inclusive of all overheads
 - ii. Installation of Service line, inclusive of overheads
 - iii. All Other costs

RESPONSE:

RESPECTFULLY SUBMITTED,



SHILINA B. BROWN (BPR No. 020689)

Senior Assistant Attorney General

VANCE L. BROEMEL (BPR No. 011421)

Managing Attorney

Office of the Tennessee Attorney General

Consumer Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202

Phone: (615) 741-2357

Fax: (615) 741-1026

Email: Shilina.Brown@ag.tn.gov

Email: Vance.Broemel@ag.tn.gov

TPUC Docket No. 26-00009

CA's 3rd DR to Atmos

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, provided upon:

Erik Lybeck, Esq. (BPR No. 35233)
Sims Funk, PLC
3102 West End Avenue, Suite 1100
Nashville, TN 37203
Phone: (615) 425-7030
Email: Elybeck@simsfunk.com

This 24th day of March, 2026.



SHILINA B. BROWN
Senior Assistant Attorney General