

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

JAN 03 2003

Jeffery S. Wagoner Docket Room

In The Matter of The Application of Atmos Energy)
for an Order to Permit the Company Establish Rates)
For a Weather Normalization Adjustment)

Docket No. 03-ATMG-539-TAR

APPLICATION

COMES NOW Atmos Energy ("Atmos") and files this application pursuant to K.S.A. 66-117 and 66-1,200, *et seq.* Atmos is hereby seeking an order to permit Atmos to establish rates for a Weather Normalization Adjustment (WNA). In support of this Application, Atmos states as follows:

I. INTRODUCTION

1. Atmos is a natural gas public utility doing business in the State of Kansas pursuant to certificates of convenience and necessity issued by the Kansas Corporation Commission ("Commission"), with a principal place of business is located at Suite 800, 1301 Pennsylvania Street, Denver, Colorado 80203.

2. Atmos is seeking approval of a WNA as described more fully below and in the prefiled testimony attached hereto.

3. In support of this Application, Atmos is submitting the testimony and exhibits of D. Allen Ashburn and Thomas H. Petersen.

4. As explained in the testimony of Messrs. Ashburn and Petersen, Atmos is seeking approval of a WNA similar to the WNA that Atmos currently has in place for its customers in the states of Georgia, Tennessee and Kentucky. Atmos requests permission to implement the WNA beginning with the 2003-04 heating season.

II. ATMOS' WNA

5. The objective of the proposed WNA is to reduce the variability of gas utility bills due to weather. During years with colder than normal weather, gas utility bills increase as customers use

more gas. Part of the increase is necessary to pay for the additional gas commodity used, but the rest of the increase is a result of the utility charging for its gas distribution services through the commodity charge contained in its tariff. Since the utility's cost of providing these distribution services is relative fixed, the utility receives a windfall from the abnormally cold weather while the customers pay higher bills. Conversely, during years with warmer than normal weather, gas utility bills decline as customers use less gas. This causes the utility to suffer a revenue shortfall while its customers enjoy lower bills. The proposed WNA is designed to adjust customer's bills during periods of abnormal weather so that customers pay approximately the same amount for the utility's gas distribution service as they would have during normal weather. The proposed WNA benefits customers by providing reductions to their bills when they are otherwise high due to abnormally cold weather and offsetting increases to customers bill when they are otherwise low due to abnormally warm weather. The proposal also benefits Atmos by making revenues more stable to better match up with the relatively stable cost of providing distribution service.


6. Under Atmos' proposed WNA, during the heating season, as each customer's bill is being calculated, Atmos' billing system will compare the heating degree-days experienced during the service period covered by the bill with normal heating degree-days. Heating degree-days are the number of degrees that the average temperature on a day is below 65 degrees. To the extent that actual heating degree-days for a customer's bill differs from normal, the billing system will apply an adjustment to the rates used to bill the customer for the actual gas consumed so that the amount of the bill, exclusive of gas cost, will be the same as it would have been with normal weather. Atmos' proposed WNA will provide a "real time" adjustment to the customers' bills.

7. Under the proposed WNA, Atmos has selected five weather stations to obtain actual and normal degree-day data. The WNA mechanism also includes a calculation of the base load and

heat sensitive factors for each customer class. The WNA schedules included in Mr. Ashburn's Schedule DAA-2 show data used in computing the base load factors and heat sensitivity factors and the computed factors. The proposed WNA uses the normal degree-days from the National Oceanic and Atmospheric Administration (NOAA) published 1971-2000 for Kansas. In order to have a highly representative base load and heat sensitive factor, the twenty-four (24) months ending September 30, 2002 were used. Referring to page 1 of Mr. Ashburn's Schedule DAA-2, the R Square (correlation of weather to weather sensitive volumes) is very tight. The published data from NOAA shows ninety-eight percent (98%) of the normal degree-days (NDD) in the months of October through May. By using these months, the customer and the utility are both covered during the months that have a high number of NDD. Atmos proposes the WNA would be in effect for the heating season of October through May each year. The WNA would apply to the rates charged to the temperature sensitive residential, commercial and public authority customers. A copy of the proposed WNA rider is attached to Mr. Ashburn's testimony.

8. Based upon the description of the proposed services set out herein and discussed in further detail in the prefiled testimony and exhibits submitted herewith, Atmos submits that the WNA will provide benefits to its customers, and will promote the public interest.

WHEREFORE, Atmos respectfully requests that the Commission approve the Application and the proposed WNA.



James G. Flaherty, #11177
ANDERSON, BYRD, RICHESON, FLAHERTY & HENRICHS
216 S. Hickory, P. O. Box 17
Ottawa, Kansas 66067
(785) 242-1234
Attorneys for Atmos Energy

VERIFICATION

STATE OF KANSAS)
)ss:
FRANKLIN COUNTY)

James G. Flaherty, of lawful age, being first duly sworn on oath, states:

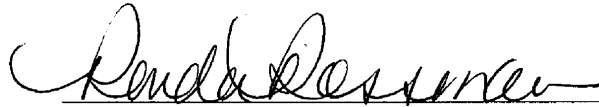
That he is an attorney for Atmos Energy; that he has read the above and foregoing Application, knows the contents thereof; and that the statements contained therein are true.



James G. Flaherty

SUBSCRIBED AND SWORN to before me this 2nd day of January, 2003.





Notary Public

My Commission Expires:

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In The Matter of The Application of Atmos)
Energy for an Order to Permit the Company)
Establish Rates For a Weather)
Normalization Adjustment)

Docket No. 03-ATMG-539-TAR

DIRECT TESTIMONY
OF
THOMAS H. PETERSEN
ON BEHALF OF
ATMOS ENERGY

DIRECT TESTIMONY
OF THOMAS H. PETERSEN
ATMOS ENERGY

Docket No. _____

1 Q. Please state your name, job title and business address.

2 A. My name is Thomas H. Petersen. I am Director of Rates for Atmos Energy
3 Corporation ("Atmos" or "Company"), 5430 LBJ Freeway, Dallas, Texas 75240. I am
4 responsible for rate studies of Atmos' gas utility operations in 12 states.

5 Q. What is your educational background and professional experience?

6 A. I received a Bachelor of Science degree in accounting from the University of
7 Nebraska at Omaha and a Master of Arts degree with a major in finance from the
8 University of Iowa. I am a Chartered Financial Analyst. From July 1980 through
9 March 1989, I was employed in Rates and Tariffs Division of the Kentucky Public
10 Service Commission. I was Manager of Rates and Revenue Requirements for Atmos
11 from April 1989 through September 1997. I was Director of Price Policy and
12 Administration from October 1997 through September 1998. I have been in my
13 current position since October 1998.

14 Q. Have you previously testified before the State Corporation Commission of Kansas?

15 A. No, however, I have presented testimony before the utility regulatory commissions
16 in Kentucky, Texas, Louisiana, Colorado and Virginia

17 Q. What is the scope of your testimony in this proceeding?

18 A. My testimony presents the objectives and benefits of the Company's WNA proposal.
19 It addresses the implications of the proposal for the Company's cost of service and

1 also addresses potential concerns that the WNA proposal might result in customer
2 confusion or send misleading price signals. Company witness Allen Ashburn is
3 providing testimony explaining the mechanics of the WNA proposal and the
4 Company's experience with WNA in other states.

5 Q. What is the purpose of the Company's WNA proposal?

6 A. The objective of the proposed WNA rider is to reduce the variability of gas utility bills
7 due to weather. During years with colder than normal weather, gas utility bills
8 increase as customers use more gas. Part of the increase is necessary to pay for the
9 additional gas commodity used, but the rest of the increase is a result of the utility
10 charging for its gas distribution services through the commodity charge contained in
11 its tariff. Since the utility's cost of providing these distribution services is relatively
12 fixed, the utility receives a windfall from the abnormally cold weather while the
13 customers pay higher bills. Conversely, during years with warmer than normal
14 weather, gas utility bills decline as customers use less gas. This causes the utility to
15 suffer a revenue shortfall while its customers enjoy lower bills. The proposed WNA
16 rider is designed to adjust customer's bills during periods of abnormal weather so that
17 customers pay approximately the same amount for the utility's gas distribution service
18 as they would have during normal weather.

19 The proposed WNA rider benefits customers by providing reductions to their
20 bills when they are otherwise high due to abnormally cold weather and offsetting
21 increases to customers bill when they are otherwise low due to abnormally warm
22 weather. The proposal also benefits the Company by making revenues more stable
23 to better match up with the relatively stable cost of providing distribution service.

- 1 Q. How will the WNA rider affect the Company's cost of capital?
- 2 A. The WNA rider will reduce the sensitivity of the Company's earnings to abnormal
3 weather. The resulting increased earnings stability is likely to be viewed favorably
4 in the capital markets and may tend to modestly reduce future capital costs. The
5 Company will include testimony addressing the effect of a WNA Rider on its capital
6 costs in its next rate filing.
- 7 Q. Will the implementation of the WNA rider significantly increase the Company's
8 administrative costs?
- 9 A. No. The Company currently has similar WNA riders in use in its Georgia, Kentucky
10 and Tennessee service areas. Therefore the Company already has the billing
11 systems and staffing in place to administer a WNA rider in Kansas. Therefore, the
12 incremental costs of implementing a WNA rider in Kansas should be modest.
- 13 Q. When will the cost changes as a result of implementing a WNA rider in Kansas be
14 reflected in rates?
- 15 A. The last rate increases for the Company in Kansas were in December 1993 for the
16 former Greeley Gas Company portion of the Company's service area and in
17 September 1995 for the former United Cities Gas Company portion. There have
18 been numerous changes in the Company's cost of service since these rate increases
19 resulting from inflation in the prices of the products and services the Company
20 purchases to serve its customers and major upgrades in information technology the
21 Company utilizes to serve its customers. Further, the Company has worked to cut
22 costs to delay the need to request a rate increase from its customers. The modest
23 changes in administrative costs and in the cost of capital resulting from implementing

1 a WNA rider in Kansas will add to the mix of cost changes that the Company has
2 experienced since it's last rate cases. All of these cost changes will be reflected in
3 the Company's next rate case. Even if this case were to be filed next year the
4 Company's customers would have enjoyed approximately 8 to 10 years without a rate
5 increase.

6 Q. Has WNA billing created any confusion for customers in the states where Atmos has
7 WNA?

8 A. In Tennessee and Kentucky the WNA amount is not broken out as a line item on the
9 bill. In these states the WNA billing does not appear to have created any confusion
10 for the customer. This can be documented by our experience in Kentucky where
11 inquires about WNA must be reported annually to the Commission. Therefore, the
12 Company has maintained records on all customer inquires about WNA in Kentucky.
13 These records show that only a few customer inquires were made each year and that
14 all of them have been successfully resolved. In Georgia, the WNA amount was
15 shown as a line item on the bill for several years. The only time that this appeared
16 to create confusion or generate customer reaction was during the period of unusually
17 high gas costs in the winter of 1999-2000. In March 2000, the Georgia PSC issued
18 an order removing the WNA amount as a line item. In summary, on the whole, WNA
19 billing has resulted in very little customer confusion in the states in which it has been
20 implemented by the Company.

21 Q. What does the company plan to do to educate its customers and reduce customer
22 confusion about the WNA rider?

23 A. The Company is committed to take all reasonable measures to answer customers

1 questions and reduce any potential confusion about WNA. Therefore, it has
2 developed a communication plan designed to educate customers. The Company will
3 include a written explanation of WNA with each customer's bill the month prior to
4 beginning WNA billing. In addition, it will include additional information with the first
5 bill that includes WNA. The Company does not plan to show WNA as a separate line
6 item on the bill. The company has prepared a script for employees to use in
7 responding to customer's questions about WNA. A copy of the script is provided as
8 THP-1.

9 Q. Why might customers ask questions about WNA billing?

10 A. WNA billing will be new to our customers and they will initially be unfamiliar with the
11 concept of WNA. The change in the billed rate per unit of gas consumed due to WNA
12 may generate additional questions. However, since the Company gets the most
13 questions about bills when the weather is colder than normal and WNA billing
14 reduces the amount of those bills, it is entirely possible that the overall effect of WNA
15 may be fewer questions about bills.

16 Q. Will the proposed WNA rider send misleading price signals to customers?

17 A. No. The proposed WNA Rider will utilize a "real-time" adjustment at the time a
18 customer's bill is calculated using weather data for the time between the current and
19 prior meter readings. Therefore, when a customer receives a bill for a month's
20 service, that bill will include a charge for the utility's gas distribution service
21 approximately equal to what it would have been during normal weather. As
22 discussed earlier, the Company's cost of providing distribution service is relatively
23 fixed and is not significantly impacted by the weather. The WNA rider will result in

1 billed charges for gas service that more closely match the cost of providing that
2 service. Therefore, the price signals from bills using the WNA rider will actually be
3 less misleading than price signals from bills without the rider.

4 Q. When would the proposed WNA be implemented?

5 A. Atmos is requesting permission to implement the WNA beginning with the 2003-04
6 heating season (October 1, 2003 to May 31, 2004). Approval of the WNA by the
7 Commission by the end of the summer 2003 will allow Atmos time to have the WNA
8 in place beginning October 1, 2003.

9 Q. Does that conclude your testimony?

10 A. Yes.

VERIFICATION OF THOMAS PETERSEN

STATE OF Texas)
)ss:
COUNTY OF Dallas)

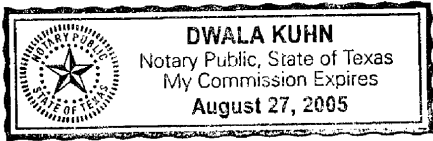
Thomas Petersen, being first duly sworn, deposes and says that he is Director of Rates for Atmos Energy Corporation; that he has read the above and foregoing Application, knows the contents thereof; and that the statements contained therein are true and correct.

Thomas Petersen
Thomas Petersen

SUBSCRIBED AND SWORN to before me this 23 day of December, 2002.

Dwala Kuhn
Notary Public

My Commission Expires:



Customer Support Center

Weather Normalization Adjustment Script

WEATHER NORMALIZATION

*Note: "WNA" (or Weather Normalization) will not appear as a line item on the customer's bill, even though it does appear on the ledger in Banner. It is included in the "Distribution Charge". See speaking points below to answer customer's questions concerning WNA.

The Kansas Corporation Commission has approved a Weather Normalization Adjustment, beginning October 1, 2002, for all residential, commercial and public authority customers of Atmos Energy. Bills will be "weather normalized" for meters read from October through May. During these months of typically colder weather, Weather Normalization will ensure that one component of your bill - your distribution charge - is relatively stable each month regardless of the temperature and volumes of gas you use.

How does Weather Normalization work?

Weather Normalization is an adjustment made to the distribution charge on your gas bill. We calculate the difference between the actual and normal temperatures for each day and adjust your distribution charge per CCF (one hundred standard cubic feet) to reflect normal temperature. Normal temperature is defined as a thirty-year average. If the temperature is colder than normal, your distribution charge per CCF will be less than it otherwise would be. If the temperature is warmer than normal, your distribution charge per CCF will be higher to reflect normal temperatures. In this way, a portion of your bill will become less sensitive to temperature variations during the winter - or "weather normalized".

What is the benefit of Weather Normalization?

Weather Normalization makes your bill and our revenues less subject to winter weather variations. Our distribution charge is set to generate a "normal" amount of margin during the winter when most gas is consumed. Without Weather Normalization, if the winter temperatures vary from normal winter levels, we would generate either more or less margin from our customers. Weather Normalization ensures that our distribution charge recovers no more or less revenue than intended regardless of weather variations. For customers, this means more stable distribution charges despite the winter temperatures.

Does Weather Normalization mean that I will pay the same amount for gas each month during the winter?

No. Your gas bill is comprised of three parts - the customer charge, gas cost charge and distribution charge. The customer charge is the fixed minimum monthly charge. The gas cost charge is based on the market price of natural gas itself and the actual volume of gas you use each month. The distribution charge is the charge for delivering natural gas to your home and includes the cost of our pipe, service trucks, wages, etc. We refer to these costs as distribution costs. ***Only your distribution charge will be weather normalized.*** Your customer charge and gas cost charge will not be affected.

So, my gas bill will still be higher during the winter and lower during warmer weather?

Yes. Since you will "buy" more gas during colder periods and less gas during warmer periods, your total gas bill will continue to fluctuate. Weather Normalization just ensures that we recover only a normal level of distribution costs during the winter.

If market prices for natural gas are predicted to be much higher this winter. Will Weather Normalization cushion the effect of higher market prices?

No. The factors behind increases in the market price of natural gas are usually national in scope and reflect, among other things, increased demand for the natural gas used by electric power plants. The gas we purchase is subject to the same market price fluctuations. Weather Normalization will only ensure we recover a normal level of distribution costs. It cannot influence the market price of gas we have to pay.

Will my bill look any different?

No. Your bill will look just the same and you may not even notice the change. However, if the weather has been colder than normal, the rate per CCF at which your distribution charge is calculated will be somewhat less. If the weather has been warmer your distribution charge will be somewhat more.

What about the gas I use that is not affected by weather, like water heating?

We determine an average volume of gas used for non-heating purposes. Those volumes will not be weather normalized.

Is Weather Normalization new?

Weather Normalization will be new to Atmos Energy's Kansas customers. However, Atmos has been providing weather normalization in Kentucky, Tennessee, and Georgia for several years. Also, gas customers served by other gas company's in Kansas and country have benefited from weather normalization for many years.

What's the bottom line?

You probably won't notice much difference in your bill because the purpose of Weather Normalization is to keep your distribution charges more stable during the winter. Still, if you have any questions, please feel free to call us at 1-888-???-????.

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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JAN 03 2003

In The Matter of The Application of Atmos)
Energy for an Order to Permit the Company)
Establish Rates For a Weather)
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Docket No. 03-ATMG-539-TAR

DIRECT TESTIMONY
OF
D. ALLEN ASHBURN
ON BEHALF OF
ATMOS ENERGY

DIRECT TESTIMONY
OF D. ALLEN ASHBURN
ATMOS ENERGY

Docket No. _____

1

INTRODUCTION

2 Q. Please state your name, position and business address.

3 A. My name is D. Allen Ashburn. I am a Senior Rate Analyst with Atmos Energy
4 Corporation ("Atmos" or "Company"). My business address is 381 Riverside Drive,
5 Suite 440, Franklin, Tennessee, 37064-8934.

6 Q. Please briefly describe your educational and professional background.

7 A. I graduated from East Tennessee State University in 1965 with a Bachelor of Science
8 Degree, majoring in Accounting. I started my public utility experience with
9 Tennessee-Virginia Energy Corporation (TVEC) in 1984, as an accountant in the
10 general accounting and plant accounting. In 1987, when TVEC merged with United
11 Cities Gas Company (UCGC), I transferred to UCGC's corporate office in Brentwood,
12 TN as the Assistant Manager of Plant Accounting. I worked in various areas of the
13 accounting department until 1995. At that time, I transferred to the rates department
14 as a senior analyst and continued in the same capacity after Atmos Energy
15 Corporation (Atmos) and UCGC merged.

16 Q. What are your duties as Senior Rate Analyst?

17 A. I am responsible for revenue deficiency studies, Weather Normalization Adjustment
18 ("WNA") reports, commission filings and other duties as assigned.

19 Q. Have you ever testified before this Commission?

1 A. No.

2 Q. Have you ever testified before any Commission?

3 A. Yes. In the United Cities Gas Company 1996 rate case in the state of Georgia.

4 Q. What is the purpose of your testimony?

5 A. The purpose of my testimony is to describe the experience Atmos has had with WNA
6 tariffs in other states and describe how Atmos' proposes to implement a WNA tariff
7 in Kansas. Company witness Thomas H. Petersen will address the objectives and
8 benefits of the Company's WNA proposal for customers and the Company.

9 Q. Does the Company have WNA in other states?

10 A. The Company currently has WNA in three of the states in which it operates. The
11 Company has had WNA in Georgia since 1990, in Tennessee since 1991 and in
12 Kentucky since 2000.

13 Q. Is the WNA rider proposed for Kansas similar to the WNA in these states?

14 A. Yes. As discussed in Mr. Petersen's testimony, we propose to calculate and bill
15 WNA in Kansas utilizing the billing system functionality already developed for these
16 states.

17 Q. What are the key characteristics of how Atmos calculates and bills WNA?

18 A. The three most important characteristics are 1) utilization of reliable weather data, 2)
19 picking weather stations in close geographic proximity to the customer, and 3)
20 calculating and billing WNA adjustments in a "real-time" mode.

21 Q. What type of weather data is utilized in Atmos' other states?

22 A. All three states utilize first order National Oceanic and Atmospheric Administration
23 (NOAA) stations. These are weather stations operated by NOAA. Typically, NOAA

1 weather data has proven very reliable. The Company receives downloads of this
2 data on a daily basis from a 3rd party weather provider.

3 Q. Have first order stations always been used in the past in Atmos' other states?

4 A. No, when Tennessee first approved WNA for a trial period the Commission requested
5 the Company (UCG) use small weather stations within the service area.

6 Q. Did this create any problems?

7 A. Yes, many times the actual degree-day amounts were not available in time to do the
8 normal billing. Also, non-NOAA stations often have missing data and it is subject to
9 more corrections when final weather information is published by NOAA two to three
10 months after month end.

11 Q. How did the Company address the issues created by non-NOAA stations?

12 A. When the WNA was made permanent the Company requested and Commission
13 agreed that although the first order stations were not as close as smaller stations, the
14 timeliness and reliability of data was significantly enough better to justify using first
15 order NOAA stations only.

16 Q. What weather stations does the Company propose to use in Kansas?

17 A. Five weather stations will be used. First order stations in Dodge City, Wichita and
18 Kansas City, Mo. Chanute and Salina are not first order stations, but are operated
19 by the Federal Aviation Administration (FAA) and use similar equipment to first order
20 stations. I have attached a map, which shows these weather stations, and there
21 weather zones. Schedule DAA-1.

22 Q. Are these weather stations in close geographic proximity to Atmos' customers?

23 A. As shown on the map, these are the closest first order or FAA operated stations to

1 our customers.

2 Q. What is the distribution of customers between these weather stations.

3 A. Kansas City, Mo. has 65%, Chanute has 22%, Salina has 6%, Dodge City has 5%
4 and Wichita has 2% of the customers.

5 Q. Are these the same weather stations that were used in the last United Cities (1995)
6 and Greeley (1993) rate cases?

7 A. No.

8 Q. Why were the same weather stations not used?

9 A. The data requirements for a WNA mechanism are more exacting than those for
10 normalizing weather in a rate case since reliable data must be available quickly for
11 WNA billing.

12 Q. How will the weather data from these stations be utilized?

13 A. On a daily basis weather data is downloaded and automatically entered into the
14 Company's billing system. As described in further detail later, the weather data used
15 to make the WNA adjustment closely matches the days that the customer actually
16 used the gas. The "real-time" adjustment made at the time of the bill calculation is
17 beneficial because it enables the customer to always see a normalized charge on the
18 bill. "Real-time" adjustments also minimize the tracking of over/under collected
19 amounts that will then need to be collected/refunded after the actual gas commodity
20 has been consumed by the customer.

21 Q. Please describe Atmos' proposed WNA Rider for Kansas.

22 A. During the heating season, as each customer's bill is being calculated, the
23 Company's billing system will compare the heating degree-days experienced during

1 the service period covered by the bill with normal heating degree-days. Heating
2 degree-days are the number of degrees that the average temperature on a day is
3 below 65 degrees. To the extent that actual heating degree-days for a customer's bill
4 differs from normal, the billing system will apply an adjustment to the rates used to
5 bill the customer for the actual gas consumed so that the amount of the bill, exclusive
6 of gas cost, will be the same as it would have been with normal weather. In addition
7 to selecting the appropriate weather stations for actual and normal degree day data
8 the WNA mechanism requires the calculation of base load and heat sensitive factors
9 for each customer class. The WNA schedules in Schedule DAA-2 show data used
10 in computing the base load factors and heat sensitivity factors and the computed
11 factors. A copy of the proposed WNA rider is attached to my testimony as Schedule
12 DAA-4.

13 Q. What criteria was used for the normal degree-days?

14 A. The normal degree-days used are from the National Oceanic and Atmospheric
15 Administration (NOAA) published 1971 – 2000 for Kansas.

16 Q. What time period was used in calculating the monthly usage.

17 A. In order to have a highly representative base load and heat sensitive factor, the
18 twenty-four (24) months ending September 30, 2002 were used.

19 Q. How accurate is this data?

20 A. Referring to page 1 of Schedule DAA-2, the R Square (correlation of weather to
21 weather sensitive volumes) is very tight.

22 Q. What months are proposed to be included in the WNA time frame?

23 A. The published data from NOAA shows ninety-eight per cent (98%) of the normal

1 degree-days (NDD) in the months of October through May. By using these months
2 the Customer and Company are both covered during the months that have a high
3 number of NDD. Therefore the Company purposes WNA would be in effect for the
4 heating season of October through May each year.

5 Q. What customers are proposed to be covered by the WNA.

6 A. The temperature sensitive residential, commercial and public authority customers
7 would be covered.

8 Q. Please explain how the WNA Factor would be calculated.

9 A. The WNA Factor would be computed to the nearest one-hundredth cent per Ccf by
10 the following formula:

$$\begin{aligned} & \text{(HSFi * (NDD-ADD))} \\ \text{WNA}_i &= \text{R}_i * \frac{\text{_____}}{\text{(BL}_i + \text{(HSFi * ADD))}} \end{aligned}$$

14 Where:

15 i = any particular Rate Schedule or billing classification within any such
16 particular Rate Schedule that contains more than one billing
17 classification.

18 WNA_i = Weather Normalization Adjustment Factor for the i^{th} rate schedule or
19 classification expressed in cents per Ccf.

20 R_i = base rate of temperature sensitive sales for the i^{th} schedule or
21 classification utilized by The State Corporation Commission of Kansas
22 in the Relevant Rate Order for the purpose of determining normalized
23 test year revenues

1 HSFi = heat sensitive factor for the i^{th} schedule or classification utilized by
2 The State Corporation Commission of Kansas Relevant in the Rate
3 Order for the purpose of determining normalized test year revenues
4 NDD = normal billing cycle heating degree days utilized by The State
5 Corporation Commission of Kansas in the Relevant Rate Order for the
6 purpose of determining normalized test year revenues
7 ADD = actual billing cycle heating degree days
8 BLi = base load sales for the i^{th} schedule or classification utilized by The
9 State Corporation Commission of Kansas in the Relevant Rate Order
10 for the purpose of determining normalized test year revenues

11 Q. After the WNA_i factor is calculated, how is the WNA amount calculated?

12 A. The WNA_i factor multiplied by the actual Ccf usage will yield the WNA amount to be
13 included on the customer's bill. This amount can be a credit or a debit depending on
14 the variance from NDD. Schedule DAA-3 is an example of how a customer's WNA
15 amount is calculated.

16 Q. Does this conclude your testimony?

17 A. Yes, this concludes my testimony.

VERIFICATION OF D. ALLEN ASHBURN

STATE OF Tennessee)
)ss:
COUNTY OF Williamson)

D. Allen Ashburn, being first duly sworn, deposes and says that he is a Senior Rate Analyst for Atmos Energy Corporation; that he has read the above and foregoing Application, knows the contents thereof; and that the statements contained therein are true and correct.

D. Allen Ashburn
D. Allen Ashburn

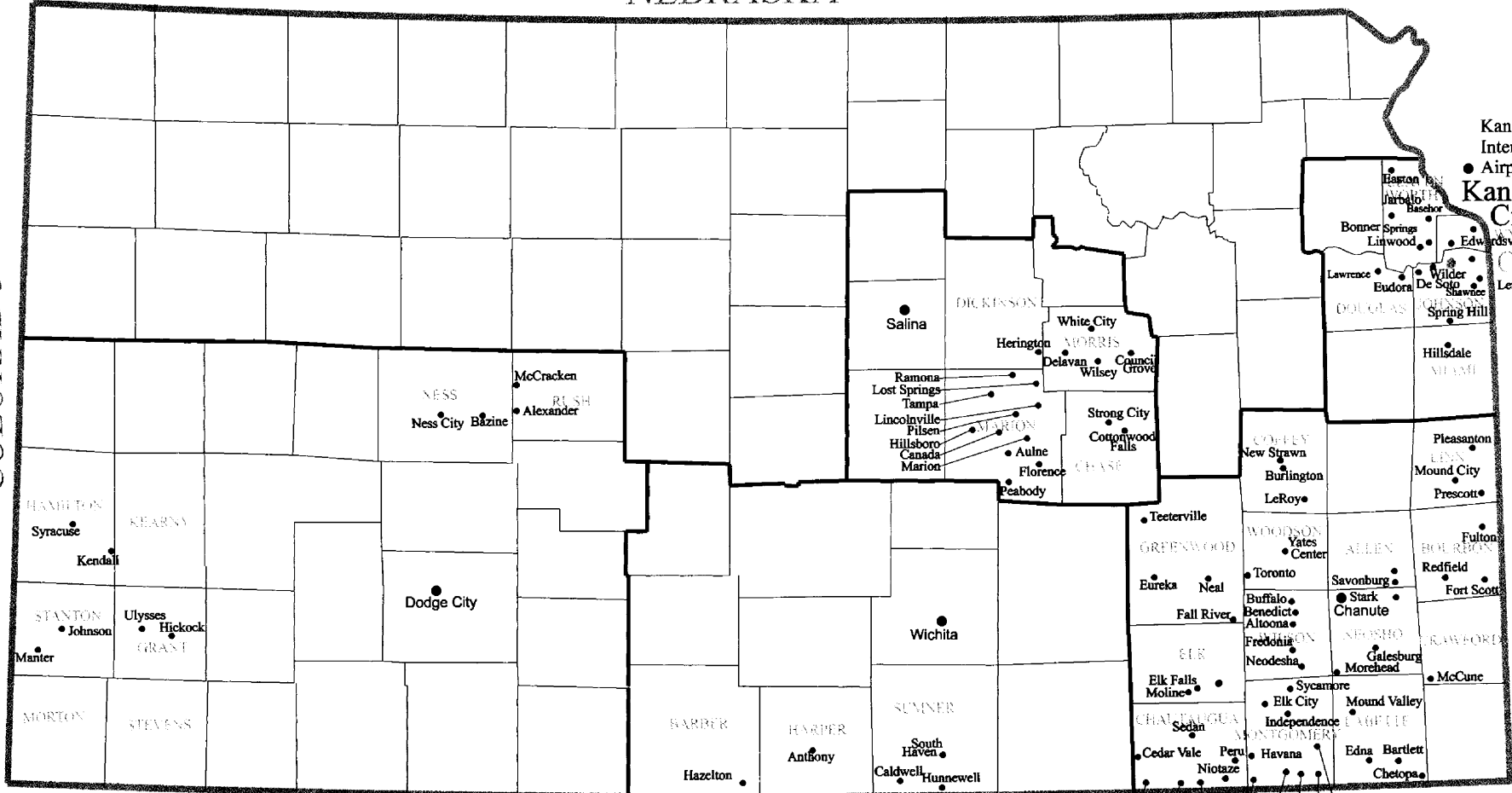
SUBSCRIBED AND SWORN to before me this 20th day of December, 2002.

Luis Carver
Notary Public

My Commission Expires:
July 26, 2003

NEBRASKA

COLORADO



Kansas City International Airport
Kansas City
 Olathe

MISSOURI

OKLAHOMA

- ★ COMPANY HEADQUARTERS
- GGC COMMUNITIES SERVED
- WEATHER STATIONS
- COUNTY SEAT



1301 Pennsylvania Street Suite 800
 Denver, Colorado 80203-5014
 (303) 831-5663 (303) 837-9549 FAX

ATMOS ENERGY CORPORATION
COLORADO-KANSAS SERVICE AREAS

Atmos Energy Corporation

Schedule DAA-2

Summary of Regression Items

Weather Stations	R Square	Base Load	Heat Sensitivity Factor
Chanute:			
Residential	0.9872	10.0126	0.1552
Commercial	0.9742	37.1183	0.4542
Public Authority	0.9869	41.7489	0.8088
Dodge City			
Residential	0.9768	17.7508	0.1493
Commercial	0.9863	64.6768	0.7592
Public Authority	0.9699	181.4358	1.0614
Kansas City			
Residential	0.9875	11.5054	0.1656
Commercial	0.9793	62.3361	0.6959
Public Authority	0.9852	8.7580	1.6712
Salina			
Residential	0.9882	10.3639	0.1408
Commercial	0.9873	60.4785	0.3596
Public Authority	0.9818	72.4145	1.0335
Wichita			
Residential	0.9799	11.2980	0.1468
Commercial	0.9825	22.8890	0.3459
Public Authority	0.9599	28.6544	1.1365

Chanute Weather Station

Schedule DAA-2

GS/RESIDENTIAL

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	23,164	655,476	28.30	192	98
NOVEMBER, 2000	23,018	1,379,484	59.93	299	389
DECEMBER, 2000	23,559	3,625,350	153.88	919	765
JANUARY, 2001	24,192	5,163,143	213.42	1,203	1,035
FEBRUARY, 2001	23,976	3,802,463	158.59	944	1,006
MARCH, 2001	23,713	2,925,766	123.38	748	666
APRIL, 2001	23,757	1,943,217	81.80	425	429
MAY, 2001	23,581	628,073	26.63	105	176
JUNE, 2001	22,678	448,478	19.78	51	40
JULY, 2001	22,758	331,782	14.58	0	0
AUGUST, 2001	22,310	279,219	12.52	0	0
SEPTEMBER, 2001	22,184	325,278	14.66	1	15
OCTOBER, 2001	22,178	438,692	19.78	119	98
NOVEMBER, 2001	22,573	1,033,607	45.79	276	389
DECEMBER, 2001	22,753	1,950,321	85.72	578	765
JANUARY, 2002	22,851	3,567,257	156.11	1,003	1,035
FEBRUARY, 2002	22,921	3,235,576	141.16	876	1,006
MARCH, 2002	23,017	2,898,982	125.95	697	666
APRIL, 2002	23,050	1,899,222	82.40	508	429
MAY, 2002	22,675	752,846	33.20	137	176
JUNE, 2002	22,258	465,272	20.90	58	40
JULY, 2002	22,084	301,553	13.65	0	0
AUGUST, 2002	21,951	282,101	12.85	0	0
SEPTEMBER, 2002	21,720	303,663	13.98	0	15
TOTAL	22,872	38,636,821	1,658.96	9,139	9,238
	548,921				

Chanute Weather Station

Schedule DAA-2

GS/COMMERCIAL FIRM

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	2,663	211,680	79.49	192	98
NOVEMBER, 2000	2,652	474,332	178.86	299	389
DECEMBER, 2000	2,701	1,201,824	444.96	919	765
JANUARY, 2001	2,765	1,850,000	669.08	1,203	1,035
FEBRUARY, 2001	2,729	1,326,088	485.92	944	1,006
MARCH, 2001	2,716	1,001,446	368.72	748	666
APRIL, 2001	2,712	638,270	235.35	425	429
MAY, 2001	2,666	222,965	83.63	105	176
JUNE, 2001	2,618	177,912	67.96	51	40
JULY, 2001	2,626	154,960	59.01	0	0
AUGUST, 2001	2,604	130,460	50.10	0	0
SEPTEMBER, 2001	2,606	156,210	59.94	1	15
OCTOBER, 2001	2,606	173,618	66.62	119	98
NOVEMBER, 2001	2,647	349,093	131.88	276	389
DECEMBER, 2001	2,691	708,894	263.43	578	765
JANUARY, 2002	2,673	1,209,823	452.61	1,003	1,035
FEBRUARY, 2002	2,662	1,080,093	405.74	876	1,006
MARCH, 2002	2,652	993,284	374.54	697	666
APRIL, 2002	2,672	618,822	231.60	508	429
MAY, 2002	2,631	249,161	94.70	137	176
JUNE, 2002	2,621	182,299	69.55	58	40
JULY, 2002	2,620	146,363	55.86	0	0
AUGUST, 2002	2,603	138,141	53.07	0	0
SEPTEMBER, 2002	2,575	153,436	59.59	0	15
TOTAL	2,655	13,549,174	5,042.21	9,139	9,238
	63,711				

Chanute Weather Station

Schedule DAA-2

GS/PUBLIC AUTHORITY FIRM

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	74	9,121	123.26	192	98
NOVEMBER, 2000	73	20,087	275.16	299	389
DECEMBER, 2000	73	58,644	803.34	919	765
JANUARY, 2001	74	77,644	1,049.24	1,203	1,035
FEBRUARY, 2001	73	62,586	857.34	944	1,006
MARCH, 2001	73	48,253	661.00	748	666
APRIL, 2001	73	29,848	408.88	425	429
MAY, 2001	74	8,788	118.76	105	176
JUNE, 2001	74	6,984	94.38	51	40
JULY, 2001	73	5,075	69.52	0	0
AUGUST, 2001	73	4,621	63.30	0	0
SEPTEMBER, 2001	73	5,900	80.82	1	15
OCTOBER, 2001	72	6,492	90.17	119	98
NOVEMBER, 2001	73	16,639	227.93	276	389
DECEMBER, 2001	72	31,808	441.78	578	765
JANUARY, 2002	72	58,637	814.40	1,003	1,035
FEBRUARY, 2002	72	51,722	718.36	876	1,006
MARCH, 2002	72	47,212	655.72	697	666
APRIL, 2002	72	29,112	404.33	508	429
MAY, 2002	72	10,697	148.57	137	176
JUNE, 2002	82	7,425	90.55	58	40
JULY, 2002	73	4,534	62.11	0	0
AUGUST, 2002	73	4,851	66.45	0	0
SEPTEMBER, 2002	75	5,090	67.87	0	15
TOTAL	73	611,770	8,393.24	9,139	9,238
	1,760				

Dodge City Weather Station

Schedule DAA-2

GS/RESIDENTIAL

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	5,010	169,705	33.87	248	127
NOVEMBER, 2000	5,042	315,939	62.66	432	459
DECEMBER, 2000	5,069	826,990	163.15	985	824
JANUARY, 2001	5,030	942,666	187.41	1,041	1,058
FEBRUARY, 2001	5,077	866,399	170.65	1,121	1,031
MARCH, 2001	5,035	710,194	141.05	802	714
APRIL, 2001	5,040	509,546	101.10	507	516
MAY, 2001	5,079	226,297	44.56	164	232
JUNE, 2001	5,035	148,348	29.46	69	55
JULY, 2001	4,979	109,213	21.93	0	1
AUGUST, 2001	4,932	100,336	20.34	0	0
SEPTEMBER, 2001	4,894	115,404	23.58	13	20
OCTOBER, 2001	4,609	110,968	24.08	135	127
NOVEMBER, 2001	4,845	265,597	54.82	283	459
DECEMBER, 2001	4,870	546,857	112.29	693	824
JANUARY, 2002	4,917	808,570	164.44	957	1,058
FEBRUARY, 2002	4,896	824,303	168.36	993	1,031
MARCH, 2002	4,907	715,514	145.81	781	714
APRIL, 2002	4,937	520,006	105.33	537	516
MAY, 2002	4,869	224,660	46.14	192	232
JUNE, 2002	4,847	163,619	33.76	45	55
JULY, 2002	4,861	101,423	20.86	0	1
AUGUST, 2002	4,816	101,523	21.08	0	0
SEPTEMBER, 2002	4,824	108,149	22.42	0	20
TOTAL	4,934	9,532,226	1,919.15	9,998	10,074
	118,420				

Dodge City Weather Station

Schedule DAA-2

GS/COMMERCIAL FIRM

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	704	139,034	197.49	248	127
NOVEMBER, 2000	714	247,358	346.44	432	459
DECEMBER, 2000	719	626,708	871.64	985	824
JANUARY, 2001	719	626,279	871.04	1,041	1,058
FEBRUARY, 2001	713	681,487	955.80	1,121	1,031
MARCH, 2001	716	468,886	654.87	802	714
APRIL, 2001	715	276,071	386.11	507	516
MAY, 2001	697	118,686	170.28	164	232
JUNE, 2001	698	81,283	116.45	69	55
JULY, 2001	679	44,881	66.10	0	1
AUGUST, 2001	683	46,099	67.49	0	0
SEPTEMBER, 2001	679	69,963	103.04	13	20
OCTOBER, 2001	704	139,034	197.49	135	127
NOVEMBER, 2001	676	193,672	286.50	283	459
DECEMBER, 2001	686	454,756	662.91	693	824
JANUARY, 2002	688	526,131	764.73	957	1,058
FEBRUARY, 2002	692	533,416	770.83	993	1,031
MARCH, 2002	693	463,523	668.86	781	714
APRIL, 2002	690	287,867	417.20	537	516
MAY, 2002	692	147,659	213.38	192	232
JUNE, 2002	670	81,100	121.04	45	55
JULY, 2002	671	44,932	66.96	0	1
AUGUST, 2002	668	45,670	68.37	0	0
SEPTEMBER, 2002	667	65,338	97.96	0	20
TOTAL	693	6,409,833	9,142.98	9,998	10,074
	16,633				

Dodge City Weather Station

Schedule DAA-2

GS/PUBLIC AUTHORITY FIRM

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	178	53,234	299.07	248	127
NOVEMBER, 2000	179	102,386	571.99	432	459
DECEMBER, 2000	180	236,014	1,311.19	985	824
JANUARY, 2001	180	240,018	1,333.43	1,041	1,058
FEBRUARY, 2001	187	244,805	1,309.12	1,121	1,031
MARCH, 2001	188	182,956	973.17	802	714
APRIL, 2001	187	136,227	728.49	507	516
MAY, 2001	186	59,278	318.70	164	232
JUNE, 2001	185	38,629	208.81	69	55
JULY, 2001	187	51,920	277.65	0	1
AUGUST, 2001	182	34,052	187.10	0	0
SEPTEMBER, 2001	181	35,427	195.73	13	20
OCTOBER, 2001	173	31,626	182.81	135	127
NOVEMBER, 2001	179	77,029	430.33	283	459
DECEMBER, 2001	181	152,303	841.45	693	824
JANUARY, 2002	183	229,064	1,251.72	957	1,058
FEBRUARY, 2002	182	231,654	1,272.82	993	1,031
MARCH, 2002	183	195,811	1,070.01	781	714
APRIL, 2002	188	147,961	787.03	537	516
MAY, 2002	184	56,779	308.58	192	232
JUNE, 2002	184	48,865	265.57	45	55
JULY, 2002	184	57,080	310.22	0	1
AUGUST, 2002	183	48,476	264.90	0	0
SEPTEMBER, 2002	183	48,843	266.90	0	20
TOTAL	183	2,740,437	14,966.79	9,998	10,074
	4,387				

Kansas City Weather Station

Schedule DAA-2

GS/RESIDENTIAL

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	"Y range"	"X range"
				Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	66,216	2,185,643	33.01	204	123
NOVEMBER, 2000	69,744	5,334,313	76.48	396	448
DECEMBER, 2000	68,079	12,471,089	183.19	1,021	847
JANUARY, 2001	70,721	17,916,661	253.34	1,366	1,148
FEBRUARY, 2001	69,838	13,392,405	191.76	1,107	1,124
MARCH, 2001	69,771	10,275,319	147.27	849	757
APRIL, 2001	69,735	6,501,335	93.23	495	503
MAY, 2001	69,797	2,334,677	33.45	111	222
JUNE, 2001	69,599	1,737,400	24.96	74	55
JULY, 2001	69,192	1,367,809	19.77	0	0
AUGUST, 2001	69,051	1,157,507	16.76	0	0
SEPTEMBER, 2001	69,345	1,344,069	19.38	2	22
OCTOBER, 2001	68,901	1,682,503	24.42	167	123
NOVEMBER, 2001	69,715	3,434,775	49.27	298	448
DECEMBER, 2001	70,193	6,881,360	98.03	573	847
JANUARY, 2002	70,605	12,804,239	181.35	1,034	1,148
FEBRUARY, 2002	70,462	11,584,466	164.41	912	1,124
MARCH, 2002	71,090	9,810,691	138.00	721	757
APRIL, 2002	72,099	6,582,304	91.30	572	503
MAY, 2002	71,477	2,803,442	39.22	194	222
JUNE, 2002	70,919	1,739,401	24.53	63	55
JULY, 2002	71,208	1,293,672	18.17	0	0
AUGUST, 2002	71,053	1,194,952	16.82	0	0
SEPTEMBER, 2002	71,235	1,415,295	19.87	0	22
TOTAL	70,002	137,245,327	1,957.99	10,159	10,498
	1,680,045				

Kansas City Weather Station

Schedule DAA-2

GS/COMMERCIAL FIRM

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	3,926	619,558	157.81	204	123
NOVEMBER, 2000	3,986	1,389,700	348.65	396	448
DECEMBER, 2000	3,959	3,081,161	778.27	1,021	847
JANUARY, 2001	4,176	4,704,744	1,126.61	1,366	1,148
FEBRUARY, 2001	4,139	3,523,199	851.22	1,107	1,124
MARCH, 2001	4,129	2,638,707	639.07	849	757
APRIL, 2001	4,118	1,733,663	421.00	495	503
MAY, 2001	4,074	677,692	166.35	111	222
JUNE, 2001	3,995	536,908	134.39	74	55
JULY, 2001	3,970	396,210	99.80	0	0
AUGUST, 2001	3,966	373,135	94.08	0	0
SEPTEMBER, 2001	4,012	386,143	96.25	2	22
OCTOBER, 2001	3,994	482,516	120.81	167	123
NOVEMBER, 2001	4,112	877,493	213.40	298	448
DECEMBER, 2001	4,240	1,681,175	396.50	573	847
JANUARY, 2002	4,318	3,139,424	727.06	1,034	1,148
FEBRUARY, 2002	4,290	2,839,716	661.94	912	1,124
MARCH, 2002	4,301	2,541,801	590.98	721	757
APRIL, 2002	4,354	1,685,851	387.20	572	503
MAY, 2002	4,282	812,414	189.73	194	222
JUNE, 2002	4,231	474,226	112.08	63	55
JULY, 2002	4,227	310,306	73.41	0	0
AUGUST, 2002	4,236	345,000	81.44	0	0
SEPTEMBER, 2002	4,257	415,905	97.70	0	22
TOTAL	4,137	35,666,647	8,565.75	10,159	10,498
	99,292				

Kansas City Weather Station

Schedule DAA-2

GS/PUBLIC AUTHORITY FIRM

MONTH	NO. OF CUSTOMERS	Ccf	Cycle		
			SALES PER CUSTOMER	NORMAL HDD	
			"Y range"	"X range"	
			ACTUAL HDD		
OCTOBER, 2000	66	14,150	214.39	204	123
NOVEMBER, 2000	66	42,035	636.89	396	448
DECEMBER, 2000	69	119,862	1,737.13	1,021	847
JANUARY, 2001	71	176,329	2,483.51	1,366	1,148
FEBRUARY, 2001	69	130,725	1,894.57	1,107	1,124
MARCH, 2001	70	97,725	1,396.07	849	757
APRIL, 2001	70	57,152	816.46	495	503
MAY, 2001	71	15,720	221.41	111	222
JUNE, 2001	68	11,455	168.46	74	55
JULY, 2001	68	6,704	98.59	0	0
AUGUST, 2001	68	4,976	73.18	0	0
SEPTEMBER, 2001	75	10,534	140.45	2	22
OCTOBER, 2001	66	13,523	204.89	167	123
NOVEMBER, 2001	68	24,305	357.43	298	448
DECEMBER, 2001	70	70,875	1,012.50	573	847
JANUARY, 2002	66	107,645	1,630.98	1,034	1,148
FEBRUARY, 2002	66	100,660	1,525.15	912	1,124
MARCH, 2002	65	80,099	1,232.29	721	757
APRIL, 2002	68	52,639	774.10	572	503
MAY, 2002	68	19,525	287.13	194	222
JUNE, 2002	70	8,366	119.51	63	55
JULY, 2002	64	3,037	47.45	0	0
AUGUST, 2002	65	3,492	53.72	0	0
SEPTEMBER, 2002	65	4,032	62.03	0	22
TOTAL	68 1,632	1,175,565	17,188.29	10,159	10,498

Salina Weather Station

Schedule DAA-2

GS/RESIDENTIAL

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	6,799	182,517	26.84	213	95
NOVEMBER, 2000	6,844	382,751	55.93	363	431
DECEMBER, 2000	6,909	1,038,867	150.36	996	827
JANUARY, 2001	6,985	1,371,169	196.30	1,259	1,090
FEBRUARY, 2001	6,946	1,084,805	156.18	1,090	1,060
MARCH, 2001	6,891	911,494	132.27	826	712
APRIL, 2001	6,817	558,642	81.95	445	479
MAY, 2001	6,832	188,104	27.53	122	204
JUNE, 2001	6,740	140,156	20.79	71	42
JULY, 2001	6,689	97,813	14.62	0	0
AUGUST, 2001	6,656	84,484	12.69	0	0
SEPTEMBER, 2001	6,576	94,624	14.39	2	12
OCTOBER, 2001	6,416	139,805	21.79	114	95
NOVEMBER, 2001	6,535	264,010	40.40	268	431
DECEMBER, 2001	6,512	543,136	83.41	635	827
JANUARY, 2002	6,719	1,013,171	150.79	979	1,090
FEBRUARY, 2002	6,643	919,700	138.45	905	1,060
MARCH, 2002	6,668	848,818	127.30	791	712
APRIL, 2002	6,675	585,247	87.68	554	479
MAY, 2002	6,611	243,384	36.82	201	204
JUNE, 2002	6,530	152,030	23.28	55	42
JULY, 2002	6,505	92,405	14.21	0	0
AUGUST, 2002	6,463	89,998	13.93	0	0
SEPTEMBER, 2002	6,460	86,487	13.39	0	12
TOTAL	6,684	11,113,617	1,641.30	9,889	9,904
	160,421				

Salina Weather Station

Schedule DAA-2

GS/COMMERCIAL FIRM

MONTH	NO. OF CUSTOMERS	Ccf	"Y range"	"X range"	Cycle	
			SALES PER CUSTOMER	ACTUAL HDD	NORMAL HDD	
OCTOBER, 2000	853	88,647	103.92	213	95	
NOVEMBER, 2000	852	171,952	201.82	363	431	
DECEMBER, 2000	865	378,223	437.25	996	827	
JANUARY, 2001	868	456,800	526.27	1,259	1,090	
FEBRUARY, 2001	866	377,513	435.93	1,090	1,060	
MARCH, 2001	860	310,445	360.98	826	712	
APRIL, 2001	861	185,824	215.82	445	479	
MAY, 2001	856	76,546	89.42	122	204	
JUNE, 2001	833	68,328	82.03	71	42	
JULY, 2001	838	56,604	67.55	0	0	
AUGUST, 2001	846	51,661	61.07	0	0	
SEPTEMBER, 2001	800	65,662	82.08	2	12	
OCTOBER, 2001	836	86,328	103.26	114	95	
NOVEMBER, 2001	830	128,862	155.26	268	431	
DECEMBER, 2001	826	200,800	243.10	635	827	
JANUARY, 2002	843	348,985	413.98	979	1,090	
FEBRUARY, 2002	829	323,280	389.96	905	1,060	
MARCH, 2002	833	311,348	373.77	791	712	
APRIL, 2002	833	204,259	245.21	554	479	
MAY, 2002	855	99,021	115.81	201	204	
JUNE, 2002	822	73,249	89.11	55	42	
JULY, 2002	816	55,884	68.49	0	0	
AUGUST, 2002	811	56,379	69.52	0	0	
SEPTEMBER, 2002	811	61,851	76.27	0	12	
TOTAL	839	4,238,451	5,007.88	9,889	9,904	
	20,143					

Salina Weather Station

Schedule DAA-2

GS/PUBLIC AUTHORITY FIRM

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	202	39,810	197.08	213	95
NOVEMBER, 2000	199	89,129	447.88	363	431
DECEMBER, 2000	202	236,282	1,169.71	996	827
JANUARY, 2001	200	282,653	1,413.27	1,259	1,090
FEBRUARY, 2001	199	236,444	1,188.16	1,090	1,060
MARCH, 2001	200	196,507	982.54	826	712
APRIL, 2001	200	120,451	602.26	445	479
MAY, 2001	200	36,620	183.10	122	204
JUNE, 2001	201	29,229	145.42	71	42
JULY, 2001	197	20,911	106.15	0	0
AUGUST, 2001	199	42,150	211.81	0	0
SEPTEMBER, 2001	195	24,257	124.39	2	12
OCTOBER, 2001	196	31,452	160.47	114	95
NOVEMBER, 2001	197	59,513	302.10	268	431
DECEMBER, 2001	196	116,356	593.65	635	827
JANUARY, 2002	200	214,875	1,074.38	979	1,090
FEBRUARY, 2002	196	195,491	997.40	905	1,060
MARCH, 2002	199	179,499	902.01	791	712
APRIL, 2002	197	115,242	584.98	554	479
MAY, 2002	201	40,478	201.38	201	204
JUNE, 2002	199	22,352	112.32	55	42
JULY, 2002	200	15,297	76.49	0	0
AUGUST, 2002	198	17,635	89.07	0	0
SEPTEMBER, 2002	200	18,533	92.67	0	12
TOTAL	199	2,381,166	11,958.69	9,889	9,904

4,773

Wichita Weather Station

Schedule DAA-2

GS/RESIDENTIAL

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	2,071	47,839	23.10	188	104
NOVEMBER, 2000	2,099	92,720	44.17	334	408
DECEMBER, 2000	2,102	296,024	140.83	940	785
JANUARY, 2001	2,117	411,228	194.25	1,185	1,056
FEBRUARY, 2001	2,108	320,535	152.06	1,001	1,031
MARCH, 2001	2,100	270,015	128.58	770	687
APRIL, 2001	2,083	181,180	86.98	437	458
MAY, 2001	2,083	61,168	29.37	100	191
JUNE, 2001	2,034	40,724	20.02	39	33
JULY, 2001	2,027	30,265	14.93	0	0
AUGUST, 2001	2,012	28,004	13.92	0	0
SEPTEMBER, 2001	2,003	26,351	13.16	0	12
OCTOBER, 2001	1,950	36,056	18.49	91	104
NOVEMBER, 2001	1,980	65,465	33.06	220	408
DECEMBER, 2001	1,999	172,778	86.43	601	785
JANUARY, 2002	2,006	293,816	146.47	936	1,056
FEBRUARY, 2002	2,024	287,732	142.16	892	1,031
MARCH, 2002	2,027	266,812	131.63	705	687
APRIL, 2002	1,995	181,173	90.81	498	458
MAY, 2002	1,989	76,002	38.21	153	191
JUNE, 2002	1,970	42,809	21.73	51	33
JULY, 2002	1,971	28,125	14.27	0	0
AUGUST, 2002	1,951	27,505	14.10	0	0
SEPTEMBER, 2002	1,956	27,730	14.18	0	12
TOTAL	2,027	3,312,056	1,612.91	9,141	9,530
	48,657				

Wichita Weather Station

Schedule DAA-2

GS/COMMERCIAL FIRM

MONTH	NO. OF CUSTOMERS	Ccf	SALES PER CUSTOMER	Cycle	
				ACTUAL HDD	NORMAL HDD
OCTOBER, 2000	286	20,930	73.18	188	104
NOVEMBER, 2000	288	43,336	150.47	334	408
DECEMBER, 2000	289	110,738	383.18	940	785
JANUARY, 2001	294	136,106	462.95	1,185	1,056
FEBRUARY, 2001	294	93,530	318.13	1,001	1,031
MARCH, 2001	290	80,286	276.85	770	687
APRIL, 2001	284	45,645	160.72	437	458
MAY, 2001	279	13,478	48.31	100	191
JUNE, 2001	264	10,046	38.05	39	0
JULY, 2001	266	8,263	31.06	0	0
AUGUST, 2001	266	8,886	33.41	0	0
SEPTEMBER, 2001	266	7,308	27.47	0	12
OCTOBER, 2001	265	10,118	38.18	91	104
NOVEMBER, 2001	266	24,207	91.00	220	408
DECEMBER, 2001	270	62,316	230.80	601	785
JANUARY, 2002	276	100,323	363.49	936	1,056
FEBRUARY, 2002	276	86,443	313.20	892	1,031
MARCH, 2002	280	79,472	283.83	705	687
APRIL, 2002	277	48,254	174.20	498	458
MAY, 2002	277	20,453	73.84	153	191
JUNE, 2002	275	10,972	39.90	51	33
JULY, 2002	276	9,121	33.05	0	0
AUGUST, 2002	276	9,158	33.18	0	0
SEPTEMBER, 2002	275	9,128	33.19	0	12
TOTAL	277	1,048,517	3,711.64	9,141	9,497
	6,655				

Wichita Weather Station

Schedule DAA-2

GS/PUBLIC AUTHORITY FIRM

MONTH	NO OF CUSTOMERS	Ccf	SALES PER CUSTOMER	"Y range"	"X range"
				ACTUAL HDD	Cycle NORMAL HDD
OCTOBER, 2000	46	5,040	109.57	188	104
NOVEMBER, 2000	46	12,424	270.09	334	408
DECEMBER, 2000	47	45,414	966.26	940	785
JANUARY, 2001	47	74,193	1,578.57	1,185	1,056
FEBRUARY, 2001	47	55,555	1,182.02	1,001	1,031
MARCH, 2001	46	48,904	1,063.13	770	687
APRIL, 2001	46	29,143	633.54	437	458
MAY, 2001	46	6,348	138.00	100	191
JUNE, 2001	45	4,461	99.13	39	0
JULY, 2001	46	3,111	67.63	0	0
AUGUST, 2001	46	2,971	64.59	0	0
SEPTEMBER, 2001	46	3,762	81.78	0	12
OCTOBER, 2001	46	4,948	107.57	91	104
NOVEMBER, 2001	46	8,126	176.65	220	408
DECEMBER, 2001	47	33,691	716.83	601	785
JANUARY, 2002	45	44,528	989.51	936	1,056
FEBRUARY, 2002	45	40,989	910.87	892	1,031
MARCH, 2002	45	39,940	887.56	705	687
APRIL, 2002	45	23,654	525.64	498	458
MAY, 2002	45	7,728	171.73	153	191
JUNE, 2002	45	4,236	94.13	51	33
JULY, 2002	45	3,366	74.80	0	0
AUGUST, 2002	45	3,677	81.71	0	0
SEPTEMBER, 2002	45	3,823	84.96	0	12
TOTAL	46	510,032	11,076.27	9,141	9,497
<hr/> <hr/>					
1,098					

Atmos Energy Corporation
 Proposed Kansas
 Weather Normalization Factor and Amount Calculation
 November 21, 2002

Schedule DAA-3
 Page 1 of 2

Sponsored by
 Allen Ashburn

Weather Station

	<u>Residential</u>
ACTUAL DEGREE DAYS	471
NORMAL DEGREE DAYS	434
DIFFERENCE	-37
HEAT SENSITIVITY FACTOR	0.162066
BASE LOAD FACTOR	10.6969
RATE	0.2657
WNA Factor =	\$(0.0183)
Usage (CCF)	167
WNA Amount =	\$ (3.06)

$$\begin{array}{r}
 \text{WNA} = R * \frac{\text{HSF (NDD - ADD)}}{\text{BL + (HSF * ADD)}} \\
 \begin{array}{r}
 \text{HSF (NDD - ADD)} \quad 0.162066 \quad X \quad 434 \quad - \quad 471 \\
 \hline
 \text{BL + (HSF * ADD)} \quad 10.6969 \quad + \quad 0.162066 \quad X \quad 471
 \end{array}
 \end{array}$$

WNA =	\$ 0.2657	0.162066	X	-37
		10.6969	+	76.33309

WNA =	\$ 0.2657	-5.996442
		87.02999

WNA =	\$ 0.2657	-0.068901
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WNA = \$(0.0183)

Atmos Energy Corporation
Proposed Kansas
Weather Normalization Adjustment
Cycle 15

Previous read date: Oct. 22, 2002
Current read date: Nov. 21, 2002

Schedule DAA-3
Page 2 of 2

Sponsored by
Allen Ashburn

Date	By Weather Station	
	Normal DD	Actual DD
10/22/2002	10	8
10/23/2002	11	9
10/24/2002	11	9
10/25/2002	11	10
10/26/2002	11	4
10/27/2002	11	3
10/28/2002	11	6
10/29/2002	11	5
10/30/2002	12	13
10/31/2002	12	22
11/1/2002	13	23
11/2/2002	14	26
11/3/2002	14	24
11/4/2002	14	18
11/5/2002	15	16
11/6/2002	15	17
11/7/2002	15	24
11/8/2002	15	19
11/9/2002	16	16
11/10/2002	16	0
11/11/2002	16	6
11/12/2002	17	13
11/13/2002	17	23
11/14/2002	17	23
11/15/2002	17	19
11/16/2002	18	18
11/17/2002	18	27
11/18/2002	18	28
11/19/2002	19	26
11/20/2002	19	16
11/21/2002	0	0
Total	434	471

Form RF

Index No.

THE STATE CORPORATION COMMISSION OF KANSAS

SCHEDULE VI: Weather Normalization Adjustment (WNA)

ATMOS ENERGY CORPORATION
(Name of Issuing Utility)

ENTIRE SERVICE AREA
(Territory to which schedule is applicable)

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 1 of 4 Sheets

SCHEDULE VI - WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER

Provisions for Adjustment

The base rate per Ccf (100,000 Btu) for gas service set forth in any Rate Schedules utilized by the State Corporation Commission of Kansas in determining normalized test period revenues shall be adjusted by an amount hereinafter described, which amount is referred to as the "Weather Normalization Adjustment." The Weather Normalization Adjustment shall apply to all temperature sensitive residential, commercial and public authority bills based on meters read during the revenue months of October through May.

Definitions

For purpose of this Rider:

"Commission" means the State Corporation Commission of Kansas.

"Relevant Rate Order" means the most recent final order of the Commission specifically prescribing or fixing the factors and procedures to be used in the application of this Rider.

Commission File Number

Issued December 2002
Month Day Year

FILED _____

Effective upon approval by the Commission
Month Day Year

THE STATE CORPORATION COMMISSION OF KANSAS

By _____ VP-Rates & Reg Affairs
Signature of Officer Title

By _____ Secretary

THE STATE CORPORATION COMMISSION OF KANSAS

SCHEDULE VI: Weather Normalization Adjustment (WNA)

ATMOS ENERGY CORPORATION
(Name of Issuing Utility)

ENTIRE SERVICE AREA
(Territory to which schedule is applicable)

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 2 of 4 Sheets

WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER (Continued)

Computation of Weather Normalization Adjustment

The Weather Normalization Adjustment shall be computed to the nearest one-hundredth cent per therm/Ccf by the following formula:

$$WNA_i = R_i \frac{(HSF_i (NDD-ADD))}{(BL_i + (HSF_i \times ADD))}$$

Where

- i = any particular Rate Schedule or billing classification within any such particular Rate Schedule that contains more than one billing classification
- WNA_i = Weather Normalization Adjustment Factor for the ith rate schedule or classification expressed in cents per therm/Ccf
- R_i = base rate of temperature sensitive sales for the ith schedule or classification utilized by the Commission in the Relevant Rate Order for the purpose of determining normalized test year revenues

Commission File Number

Issued December 2002
Month Day Year

FILED _____

Effective upon approval by the Commission
Month Day Year

THE STATE CORPORATION COMMISSION OF KANSAS

By _____ VP-Rates & Reg Affairs
Signature of Officer Title

By _____ Secretary

Form RF

Index No.

THE STATE CORPORATION COMMISSION OF KANSAS

SCHEDULE VI: Weather Normalization Adjustment (WNA)

ATMOS ENERGY CORPORATION (Name of Issuing Utility)

ENTIRE SERVICE AREA (Territory to which schedule is applicable)

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 3 of 4 Sheets

WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER (Continued)

- HSF_i = heat sensitive factor for the i^th schedule or classification utilized by the Commission in the Relevant Rate Order for the purpose of determining normalized test year revenues
NDD = normal billing cycle heating degree days utilized by the Commission in the Relevant Rate Order for the purpose of determining normalized test year revenues
ADD = actual billing cycle heating degree days
Bl_i = base load sales for the i^th schedule or classification utilized by the Commission in the Relevant Rate Order for the purpose of determining normalized test year revenues

Filing with Commission

The Company will file as directed by the Commission (a) a copy of each computation of the Weather Normalization Adjustment, (b) a schedule showing the effective date of each such Weather Normalization Adjustment, and (c) a schedule showing the factors or values derived from the Relevant Rate Order used in calculating such Weather Normalization Adjustment.

Commission File Number

Issued December 2002 (Month, Day, Year)

FILED

Effective upon approval by the Commission (Month, Day, Year)

THE STATE CORPORATION COMMISSION OF KANSAS

By VP-Rates & Reg Affairs (Signature of Officer, Title)

By (Secretary)

Form RF

Index No.

THE STATE CORPORATION COMMISSION OF KANSAS

SCHEDULE VI: Weather Normalization Adjustment (WNA)

ATMOS ENERGY CORPORATION
(Name of Issuing Utility)

ENTIRE SERVICE AREA
(Territory to which schedule is applicable)

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 4 of 4 Sheets

WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER (Continued)

Base Use/Heat Use Factors

<u>Weather Station</u>	<u>Residential</u>		<u>Commercial</u>		<u>Public Authority</u>	
	<u>Base use Ccf</u>	<u>Heat use Ccf/HDD</u>	<u>Base use Ccf</u>	<u>Heat use Ccf/HDD</u>	<u>Base use Ccf</u>	<u>Heat Use Ccf/HDD</u>
Chanute	10.0126	.1552	37.1183	.4542	41.7489	.8088
Dodge City	17.7508	.1493	64.6768	.7592	181.4358	1.0614
Kansas City, MO	11.5054	.1656	62.3361	.6959	8.7580	1.6712
Salina	10.3639	.1408	60.4785	.3596	72.4145	1.0335
Wichita	11.2980	.1468	22.8890	.3459	28.6544	1.1365

Commission File Number

Issued December 2002
Month Day Year

FILED _____

Effective upon approval by the Commission
Month Day Year

THE STATE CORPORATION COMMISSION
OF KANSAS

By _____ VP-Rates & Reg Affairs
Signature of Officer Title

By _____
Secretary