#### BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of Atmos Energy's Compliance	)	
Filing of its Accelerated Pipe Replacement Plan	)	Docket No. 18-ATMG-316-CPL
Pursuant to Docket No. 15-GIMG-343-GIG	)	

#### MOTION FOR EXTENSION TO FILE COMPLIANCE REPORT

Atmos Energy Corporation ("Atmos Energy") hereby moves the Kansas Corporation Commission ("Commission") for an extension of time to file its annual report which provides information on progress made since Atmos Energy submitted its Plan for Systematic Accelerated Replacement of Bare Steel Service/Yard Lines and Bare Steel Mains Within Class 3 Locations/Urban Areas ("343 Plan") on April 24, 2018. In support of its Motion, Atmos Energy states as follows:

1. Atmos Energy's update to its 343 Plan was originally due on March 31, 2020. Atmos Energy is requesting that it be allowed to submit its update to its 343 Plan on or before May 5, 2020. The Atmos Energy employees, who are responsible for preparing the updated 343 Plan, have been working on the utility's response to the COVID-19 virus, and have not had sufficient time to complete the updated 343 Plan. The requested extension to file the updated plan will not have a negative impact on Atmos Energy's ability to provide efficient and sufficient service to its customers or its ability to implement its updated 343 Plan.

WHEREFORE, Atmos Energy requests that it be allowed to file its updated 343 Plan in the above-captioned docket with the Commission by no later than May 5, 2020.

James G. Flaherty, #11177

ANDERSON & BYRD, LLP

216 S. Hickory ~ P.O. Box 17

Ottawa, Kansas 66067

(785) 242-1234, telephone

(785) 242-1279, facsimile

jflaherty@andersonbyrd.com

Attorneys for Atmos Energy Corporation

## **VERIFICATION**

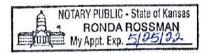
## STATE OF KANSAS COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn deposes and says that he is attorney for Atmos Energy Corporation; that he has read the above and foregoing Motion for Extension to File Compliance Report; and the statements therein contained are true.

James G. Flaherty

Loude Lassnee

SUBSCRIBED AND SWORN to before me this 6th day of April, 2020.



Notary Public

Appointment/Commission Expires:

# **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 6<sup>th</sup> day of April, 2020, addressed to:

David W. Nickel Todd E. Love

d.nickel@curb.kansas.gov t.love@curb.kansas.gov

Della Smith
d.smith@curb.kansas.gov
Robert Elliott Vincent
r.vincent@kcc.ks.gov

Shonda Rabb s.rabb@curb.kansas.gov

James G. Flaherty