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August 24, 2021

via e-filing EXPRESS

Ms. Lynn M. Retz
Executive Director
Kansas Corporation Commission
1500 S. W. Arrowhead Road
Topeka, Kansas 66604-4027

Re: Atmos Energy Corporation; Docket No. 19-ATMG-525-RTS
System Integrity Program Plan for Year 2 filed July 30, 2021
Correction to Exhibit A

Dear Ms. Retz:

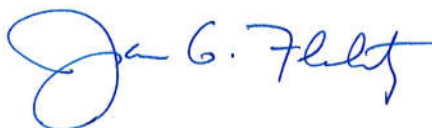
Atmos Energy discovered an error on Exhibit A to its System Integrity Program Plan for Year 2 filed with the Commission in the captioned docket on July 30, 2021. Specifically, the proposed projects listed on Page 3 of 4 of Exhibit A for Year 3 were incorrect (the Year 2 projects were incorrectly included as Year 3 projects and the Year 3 projects were unintentionally omitted). A red-line copy of Exhibit A, showing the corrections on Page 3 of 4 is included with this letter. Also included is a clean copy of the corrected Exhibit A.

Atmos Energy requests the enclosed, corrected Exhibit A be substituted for the Exhibit A filed with the Commission on July 30, 2021.

A copy of this filing has been e-served to those persons listed on the service list in this docket.

Please let me know if you have any questions.

Sincerely,



James G. Flaherty
jflaherty@andersonbyrd.com

JGF:rr

Enclosure

cc: See Attached List

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Exhibit A

ATMOS ENERGY CORPORATION'S 2021 SYSTEM INTEGRITY PROGRAM PLAN

I. OVERALL GOALS FOR PROGRESS AND PRIORITIZATION METHODOLOGY ON REPLACING OBSOLETE PIPES

1. Listed below are the details for the first five plan years of Atmos Energy's System Integrity Program ("SIP") plan. The projects are prioritized using a tool that considers several factors that produce an overall score. Also, the initial cost estimates will be refined later in the summer when the bid process is complete and will be provided to the Kansas Corporation Commission ("Commission"), its Staff and the Citizens' Utility Ratepayer Board ("CURB"). The tool used by Atmos Energy to prioritize the replacement of obsolete pipes will also be discussed with Staff and CURB.

2. The factors for the tool fall into two categories which are the "Likelihood of Failure," and the "Consequence of Failure." The "Likelihood of Failure" factors include leakage history, and subject matter expert input on any known pipe issues or cathodic protection problems. The "Consequence of Failure" attributes include critical facilities, population density, amount of wall to wall pavement, potential impact radius, maximum pressure, and leak response time. These two categories are combined to produce an overall score. In addition, replacement of low pressure systems and bare steel are a priority or goal for the initial five-year plan.

II. SIP PLAN YEAR 2 PROPOSED PROJECTS

3. The following list of projects and their estimated costs is proposed for Year 2 of Atmos Energy's SIP plan.

Plan Year 2

		Retire Miles					
Area	Score	Known	Total	Install Miles	Services		Est Cost
		Bare Steel			Replace	Total	
Yates Center Grove St: E Oak St to W Mary St	22.8	6.50	9.57	7.76	282	513	\$2,909,690
Independence US-75: Mulberry St - Oak St	21.2	2.87	4.09	2.26	179	311	\$1,491,000
Burlington US-75: Kennedy to Neosho	20.4	2.53	4.17	3.52	177	322	\$1,698,010
Year 2 Total		11.90	17.83	13.54	638	1,146	\$6,098,700

4. A description of each of the proposed projects is set forth below:

(a) Project 1- Yates Center

Project 1 will replace one of three risk ranked sections in Yates Center. This project will generally replace the north half of the town currently operating on low pressure. The pipe to be replaced is in a class 3 location, and mostly consists of bare steel and vintage plastic. The higher risk score is driven by the historical leak rate, high SME scores on prior pipe issues, and cathodic protection history.

(b) Project 2 - Independence

Project 2 will replace one of fourteen risk ranked sections in Independence located on the north side of the city, and west of US-75. The pipe to be replaced is in a class 3 location consisting mainly of low-pressure bare steel, and vintage plastic. The higher risk score is driven by the leak rate, high SME scores on prior pipe issues and cathodic protection history, and a high critical facility score.

(c) Project 3 - Burlington

Project 3 will replace one of four risk ranked sections in Burlington. The project is located on the west side of US-75. The pipe is in a class 3 location and is low-pressure. The higher risk score is being driven by high scores for historical leak

rate, cathodic protection history, critical facilities, and population density. The majority of the replacement is bare steel or vintage plastic.

III. FIVE-YEAR GENERAL PLAN OF SIP PROJECTS

5. Below is a list of proposed projects and their estimated costs for years ~~23~~-5 under Atmos Energy's proposed SIP plan.

Plan Years 3-5

Risk Area	Risk Score	Known Bare Steel	Est Cost
Independence Locust St: N 20th St - N 10th St Center Grove St: E Oak St to W Mary St	22.8 <u>19.7</u>	6.5 <u>4.1</u>	\$2,909,690 <u>2,279,438</u>
Independence Beech St: N 10th St - N 2nd St Independence US-75: Mulberry St - Oak St	21.2 <u>18.1</u>	2.8 <u>2.4</u>	\$1,491,000 <u>1,332,503</u>
Caney E 3rd Ave: High to Smith Kennedy to Neosho Burlington US-75-	20.4 <u>18.1</u>	2.5 <u>3.4</u>	\$1,698,010 <u>2,424,907</u>
Year 3 Total		10.9	\$6,098,700 <u>6,036,848</u>
Altoona City Wide	16.1	2.5	\$1,367,342
Coffeyville 1 st to Martin; Grant to Sycamore	15.3	3.5	\$1,939,551
Sedan Bradley St: Park Ave - School St	14.5	2.9	\$1,570,166
Caney 6 th Ave: S Foreman to US-75	14.5	4.9	\$2,694,698
Year 4 Total		13.8	\$7,572,027
Spring Hill Jefferson St: Allen - South	13.8	2.1	\$1,025,769

Yates Center Wilson St: S Grove to US-75	13.8	2.1	\$1,610,695
Independence Laurel St: N 20 th St - N 10 th St	13.3	3.5	\$1,685,007
Fredonia 4 th St: Monroe Street - Robinson St	13.0	5.9	\$2,878,528
Year 5 Total		13.6	\$7,200,000

IV. COMMISSION APPROVAL OF SIP PLAN

6. Atmos Energy seeks approval of the overall SIP plan objectives and goals, proposed projects and estimated investment levels as set forth in its initial SIP plan.

Exhibit A

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