

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Complaint Against Atmos Energy)
by DH Pace Company Located At: 1901 E. 119th) Docket No. 16-ATMG-049-COM
Street, Olathe, Kansas 66061)

REPLY OF ATMOS ENERGY TO DH PACE'S EXHIBIT D-1

Atmos Energy provides the following reply to Exhibit D-1 filed by DH Pace on January 27, 2016.

1. The information provided by DH Pace in Exhibit D-1 does not change the uncontroverted fact that Atmos Energy had an actual beginning meter reading, an actual ending meter reading, and an actual interim meter reading in July 2015 which accurately measured the amount of gas used by DH Pace during the period in question. The total billed was an ACTUAL amount, only the monthly allocations were not actuals. While DH Pace's 2015 calendar year usage was less than its calendar year 2014 usage, weather and other factors likely account for the difference.

2. The allocation that was originally done by Atmos Energy, was based on "days of usage" during the period November 12, 2013, through January 13, 2015, without regard to weather. The allocated bills for November 22, 2013, and December 23, 2013, were less than what demonstrated the bills would have been by using a degree day calculation (see "Redistribution Cal" spreadsheet attached hereto as Exhibit A). Atmos Energy allocated 8,762 CCF for those two bills, but based on a degree day calculation it would have been 15,318 CCF, a difference of 6,656 CCF.

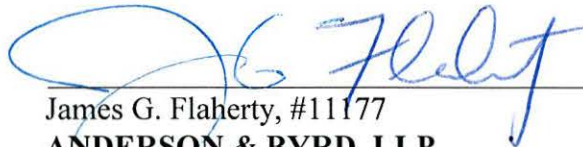
3. Looking at the weather (see "Degree Day Comparison" spreadsheet attached hereto as Exhibit B), 2014 was almost 12% colder than normal (11.48%) and 2015 was over 9% warmer than normal (9.23%). Comparing year over year, 2015 was almost 20% warmer than 2014 (19.06%). This

accounts for a large portion of the difference in usage between 2014 and 2015.

4. A third factor that needs to be considered is that since DH Pace wasn't receiving gas bills in 2014, it was not aware of its actual usage in the garages. During the one visit Atmos Energy made to DH Pace's business premise, the large garage warehouse doors were open despite the cold weather.

5. DH Pace should be responsible for paying for the amount of gas actually metered for the period in question.

WHEREFORE, based upon the reasons set forth herein and in the pleadings and exhibits previously provided in this docket by Atmos Energy, Atmos Energy requests the Commission issue an Order denying the complaint filed by DH Pace.



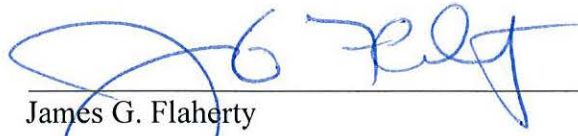
James G. Flaherty, #11177
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VERIFICATION

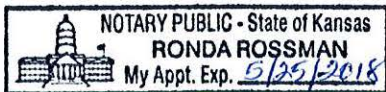
STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

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

That he is the attorney for Atmos Energy, named in the foregoing Reply to DH Pace's Exhibit D-1, and is duly authorized to make this affidavit; that he has read the foregoing Reply, and knows the contents thereof; and that the facts set forth therein are true and correct.


James G. Flaherty

SUBSCRIBED AND SWORN to before me this 1st day of February, 2016.



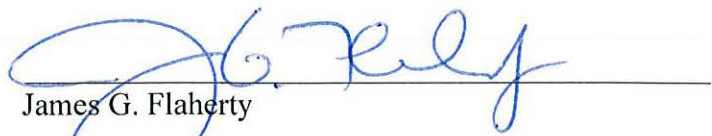


Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent by electronic mail and also mailed, postage prepaid, this 1st day of February, 2016, addressed to: Chris Mann, Executive Vice President/CIO, DH Pace Door Company, Inc., 1901 E. 119th Street, Olathe, Kansas 66061, chris.mann@dhpace.com, Michael J. Duenes, Litigation Counsel, Kansas Corporation Commission, 1500 SW Arrowhead Road, Topeka, Kansas 66604-4027, m.duenes@kcc.ks.gov, and Leah Battista, Managed Energy Systems, 6600 College Blvd., Ste. 125, Overland Park, Kansas 66211, leah@energymes.com.


James G. Flaherty

DH Pace, Modified Proration to DD Usage

Meter Read Dates	Calculated Readings	Prorated Usage	PGA Rates	PGA	Hedge 0.06135	Degree Days	Degree Days	Percent Per DD	Calc Usage w/DD	PGA	Hedge 0.06135
11/12/2013	1095										
11/22/2013	3086	1991	0.45298	\$901.88		631 *	210	0.030983	2,635	\$1,193.38	
12/23/2013	9857	6771	0.48528	\$3,285.83		1011	1011	0.149159	12,683	\$6,154.95	
1/27/2014	16229	6372	0.53034	\$3,379.33		1079	1079	0.159192	13,536	\$7,178.88	
2/25/2014	22004	5775	0.55284	\$3,192.65		845	845	0.124668	10,601	\$5,860.53	
3/26/2014	27779	5775	0.74233	\$4,286.96		625	625	0.09221	7,841	\$5,820.47	
4/25/2014	33753	5974	0.69452	\$4,149.06	\$254.54	314	314	0.046326	3,939	\$2,735.87	\$241.67
5/27/2014	40125	6372	0.57312	\$3,651.92	\$224.05	93	93	0.013721	1,167	\$668.67	\$71.58
6/25/2014	45900	5775	0.51242	\$2,959.23	\$181.55	8	8	0.00118	100	\$51.43	\$6.16
7/25/2014	51874	5974	0.50925	\$3,042.26	\$186.64	1	1	0.000148	13	\$6.39	\$0.77
8/26/2014	58246	6372	0.50652	\$3,227.55	\$198.01	0	0	0	-	\$0.00	\$0.00
9/25/2014	64220	5974	0.53637	\$3,204.27	\$196.58	46	46	0.006787	577	\$309.53	\$35.40
10/24/2014	69995	5775	0.53637	\$3,097.54	\$190.03	278	278	0.041015	3,488	\$1,870.64	\$213.96
11/21/2014	75571	5576	0.51327	\$2,861.99		631	631	0.093095	7,916	\$4,063.09	
12/26/2014	82541	6970	0.52353	\$3,649.00		1011	1011	0.149159	12,683	\$6,640.08	
1/13/2015	86127	3586	0.51033	\$1,830.04		1079 *	626	0.092358	7,853	\$4,007.80	

* Partial month proration

Totals	85032	\$46,719.51	\$1,431.41	6778	1	85,032	\$46,561.70	\$569.54
Cost Total		\$48,150.92						\$47,131.24
Difference								\$1,019.68

EXHIBIT A

Degree Day Comparisons

Month	Normal Degree Days	2014 Degree Days	2015 Degree Days
Jan	1079	1222	1004
Feb	845	1094	1062
Mar	625	756	537
Apr	314	342	220
May	93	113	85
Jun	8	1	4
Jul	1	1	1
Aug	0	0	1
Sep	46	57	16
Oct	278	206	242
Nov	631	794	515
Dec	1011	911	762

Total	4931	5497	4449
Actual Comp to Normal		111.48%	90.23%
2015 Actual Comp to 2014			80.94%