

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a General Investigation Regarding)
the Acceleration of Replacement of Natural Gas)
Pipelines Constructed of Obsolete Materials)
Considered to be a Safety Risk.) Docket No. 15-GIMG-343-GIG

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

**MOTION TO SUPPORT THE REQUEST OF
KANSAS GAS SERVICE TO REMOVE L&U DATA
FROM ANNUAL PIPE REPLACEMENT PROGRAM**

Atmos Energy Corporation ("Atmos Energy") submits this Motion in support of the request filed by Kansas Gas Service, a division of ONE Gas, Inc. ("Kansas Gas Service") in Docket No. 15-GIMG-343-GIG ("343 Docket"), requesting removal of the requirement to file annual Lost and Unaccounted for Gas ("L&U") reports for cities with more than 10,000 customers as part of the annual pipeline replacement program compliance filings. In support of its motion, Atmos Energy states:

1. In accordance with the Commission's Final Order issued on September 17, 2017 in the 343 Docket, Atmos Energy submitted its Plan for the Systematic Accelerated Replacement of Bare Steel Service/Yard Lines and Bare Steel Mains Within Class 3 Locations/Urban Areas ("Plan") on April 24, 2018 in Docket No. 18-ATMG-316-CPL ("316 Docket"). This Plan included a commitment to file annual L&U reports for communities with more than 10,000 customers.

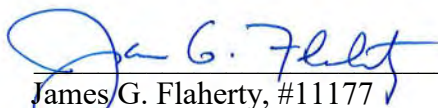
2. Since 2019, Atmos Energy has submitted annual L&U reports in compliance with the Commission's directive; however, as noted in its initial application filing in the 316 Docket, and reaffirmed through subsequent reports, Atmos Energy has consistently expressed concern regarding the limited analytical value of L&U data in evaluating the effectiveness of its pipeline replacement efforts.

The L&U metric is influenced by a wide range of variables, including meter inaccuracies, billing cycles, theft, venting, and accounting timing, which obscure its usefulness as a performance indicator for pipe integrity.

3. Atmos Energy submitted its most recent L&U report on April 1, 2025 and cautioned against the over-reliance on the use of L&U as a significant determinant in measuring the effectiveness of a pipe replacement plan. There are many factors that contribute to L&U including but not limited to measurement, third-party damage, billing errors, leakage and the timing of billing and consumption.

4. Atmos Energy supports the position of Kansas Gas Service in that the L&U reporting requirement has fulfilled its intended purpose and no longer provides meaningful insight into the performance of accelerated pipe replacement programs. Atmos Energy understands the Commission Staff and CURB are amenable to removing the L&U reporting requirement, subject to Commission approval. Atmos Energy remains open to further discussions if the Commission deems further discussion is necessary.

WHEREFORE, Atmos Energy respectfully requests that the Commission grant the motion of Kansas Gas Service and extend the same L&U reporting requirement relief to Atmos Energy by removing the requirement to file annual L&U reports for cities with more than 10,000 customers in Docket No. 18-ATMG-316-CPL.

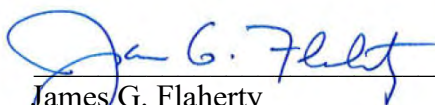


James G. Flaherty, #11177
ANDERSON & BYRD, LLP
216 S. Hickory ~ P.O. Box 17
Ottawa, Kansas 66067
(785) 242-1234, telephone
(785) 242-1279, facsimile
jflaherty@andersonbyrd.com
Attorneys for Atmos Energy Corporation

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 to Support the Request of Kansas Gas Service to Remove L&U Data from Annual Pipe Replacement Program and the statements therein contained are true.


James G. Flaherty

SUBSCRIBED AND SWORN to before me this 21st day of August, 2025.





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 21st day of August, 2025, addressed to:

KATHLEEN R. OCANAS

kathleen.ocanas@atmosenergy.com

ROBERT W. DANIEL

rob.daniel@blackhillscorp.com

ROBERT E. VINCENT

robert.vincent@onegas.com

JANET L. BUCHANAN

janet.buchanan@onegas.com

JOSEPH R. ASTRAB

Joseph.Astrab@ks.gov

TODD E. LOVE

Todd.Love@ks.gov

SHONDA RABB

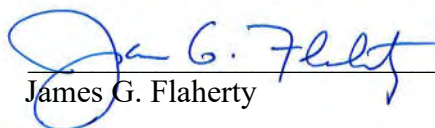
Shonda.Rabb@ks.gov

DELLA SMITH

Della.Smith@ks.gov

CARLY R. MASENTHIN

Carly.Masenthin@ks.gov



James G. Flaherty