## 2001.11.16 16:49:20 Kansas Corporation Commission 28.2 Jet STATE CORPORATION COMMISSION

NOV 1 6 2001

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

)

)

)

)

)

Poffy & Cergonian Docket Room

In the Matter of the Filing of Written Documents and Gas Purchase Reports by Greeley Gas Company, a division of Atmos Energy Corporation, as Prescribed by Commission Order dated June 21, 2001 in Docket No. 106,850-U / 75-GIMC-009-GIG

Docket No. 02-GRLG-364-GPR

## APPLICATION

COMES NOW Applicant, Greeley Gas Company, a division of Atmos Energy Corporation ("Greeley") and files this request for the Kansas Corporation Commission ("Commission") to open a utility-specific docket for Greeley to utilize in filing its monthly contract summary filings and its annual written report relating to supply and transportation contracts and purchasing practices. This Application is being filed in accordance with the Order issued by the Commission in KCC Docket No. 106.850-U (75-GIMC-009-GIG) on June 21, 2001. In support of this Application, Greeley states as follows:

Greeley is a corporation duly organized under the laws of the State of Texas and the 1. Commonwealth of Virginia, with a principal place of business at Suite 800, 1301 Pennsylvania Street, Denver, Colorado 80203.

2. All communication regarding this Application should be addressed to:

Joe T. Christian Greeley Gas Company Penn Center, Suite 800 1301 Pennsylvania Street Denver, CO 80203-5015

James W. Bartling Manager of Public Affairs Greeley Gas Company 730 North Ridgeview Olathe, Kansas 66061

Douglas C. Walther Senior Attorney Atmos Energy Corporation P. O. Box 650205 Dallas, Texas 75265-0205

John W. Hack Director of Gas Supply Planning Atmos Energy Corporation P. O. Box 650205 Dallas, Texas 75265-0205

with copies to:

James G. Flaherty Anderson, Byrd, Richeson, Flaherty & Henrichs 216 S. Hickory, P. O. Box 17 Ottawa, Kansas 66067

3. Greeley is duly authorized to transact the business in the State of Kansas as a foreign corporation, holds appropriate certificates from this Commission to transact business as a natural gas public utility, and is now and has been engaged in the purchase, transmission, sale and distribution of natural gas in the State of Kansas in accordance with the laws of said state and the rules and regulations of this Commission.

4. On June 21, 2001, the Commission issued an Order in Docket No. 106,850-U (75-GIMC-009-GIG). In that Order, the Commission ordered Greeley and other natural gas utilities in the state to file with the Commission monthly contract summary filings and an annual written report relating to supply and transportation contracts and purchasing practices. The Order indicated that the filings should be made in utility-specific dockets.

5. Greeley has conferred with the Staff of the Commission regarding the opening of a utility-specific docket pursuant to the Commission's June 21, 2001 Order, and the Staff has requested that the utility file this Application with the Commission.

6. The purpose of this Application is to request that the Commission open a

2

utility-specific docket for Greeley to utilize in filing its monthly contract summary filings and its annual written report relating to supply and transportation contracts and purchasing practices.

7. Greeley is filing a Motion for Protective Order and Motion for Scheduling Conference simultaneously with the filing of this Application. The purpose of the Motion for Protective Order is to have the Commission establish guidelines regarding the review by parties of confidential information contained in the monthly contract summary filings and annual written report. The purpose of the Scheduling Conference is to establish a schedule for the annual meeting between Greeley and the Staff of the Commission.

8. The granting of this Application and the motions filed herewith will allow Greeley to meet the requirements established by the Commission in its June 21, 2001 Order, in an orderly and formal process.

WHEREFORE, Greeley requests that its Application be granted.

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

## **VERIFICATION**

STATE OF KANSAS)

COUNTY OF FRANKLIN )

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

)ss:

That he is an attorney for the Greeley Gas Company, a division of Atmos Energy Corporation, Applicant named in the foregoing Application, and is duly authorized to make this affidavit; that he has read the foregoing Application, and knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.

James G. Flaher

SUBSCRIBED AND SWORN to before me this 16 day of November, 2001.



My Commission Expires:

-Ronda Hossora

Notary Public