# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

IN THE MATTER OF THE APPLICATION	)		
OF ATMOS ENERGY CORPORATION	)	Docket No.	
FOR REVIEW AND ADJUSTMENT OF ITS	)	<b>26-ATMG</b>	RTS
NATURAL GAS RATES	)		

# **DIRECT TESTIMONY OF JOE T. CHRISTIAN**

**JULY 25, 2025** 

SUBMITTED ON BEHALF OF
ATMOS ENERGY CORPORATION

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1		I. <u>INTRODUCTION</u>
2	Q.	PLEASE STATE YOUR NAME, OCCUPATON AND BUSINESS ADDRESS.
3	A.	My name is Joe T. Christian. My business address is 2946 Camden Bluff Road,
4		Frisco, Texas 75034. I am an independent utility rate and regulatory consultant.
5	Q.	ON WHOSE BEHALF ARE YOU APPEARING TODAY?
6	A.	I am appearing on behalf of Atmos Energy Corporation ("Atmos Energy" or the
7		"Company").
8		II. QUALIFICATIONS
9	Q.	PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND
10		PROFESSIONAL EXPERIENCE.
11	A.	I graduated from East Texas State University in 1985 with a Bachelor of Business
12		Administration Degree, majoring in Accounting. In 1987, I received a Masters of
13		Business Administration from East Texas State University. I am a Certified Public
14		Accountant ("CPA") in the State of Texas and a member of the American Institute
15		of Certified Public Accountants. I have made presentations before the Texas
16		Society of CPA's Energy Conference and other industry groups and the NARUC
17		Staff Subcommittee on Accounting and Finance.
18		My professional experience includes approximately two years of public
19		accounting experience with a large local accounting firm based in Dallas, Texas. In
20		1989, I accepted a position in the internal audit group with Atmos Energy. I was
21		promoted to positions of increasing responsibility within the Atmos Energy finance
22		team during my first nine years with Atmos Energy. I joined Atmos Energy's

Colorado-Kansas operations as Vice President & Controller in June of 1998 and,

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1	effective December 1, 2001, was named Vice President of Rates & Regulatory
2	Affairs. I joined Atmos Energy's corporate Rates & Regulatory Affairs department
3	on August 1, 2007 where I was responsible for leading and directing the rates and
4	regulatory activity in Atmos Energy's eight-state service area. This responsibility
5	included developing the strategy, preparing the revenue requirement filings, and
6	managing the overall ratemaking process for Atmos Energy. I retired from Atmos
7	Energy on June 2, 2025.

- 8 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE KANSAS
- 9 **CORPORATION COMMISSION ("COMMISSION")?**
- 10 A. Yes. I have submitted testimony before the KCC in five general rate case proceedings<sup>1</sup> and provided oral comments to the KCC in a rules investigation.<sup>2</sup>
- 12 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE OTHER REGULATORY
- 13 **COMMISSIONS?**
- 14 A. Yes. I have previously provided expert testimony before a number of state 15 regulatory authorities as enumerated in Attachment JTC-1.
- 16 **PURPOSE OF TESTIMONY**
- 17 Q. WHAT IS THE SCOPE OF YOUR TESTIMONY IN THIS PROCEEDING?
- 18 A. I am responsible for supporting the calculation of the Company's capital structure
  19 and embedded cost of debt to be used in establishing base rates for historic test
  20 period March 31, 2025.

Direct Testimony of Joe T. Christian

 $<sup>^{1}</sup>$  Docket Nos. 03-ATMG-1036-RTS, 08-ATMG-280-RTS, 10-ATMG-495-RTS, 12-ATMG-564-RTS, 14-ATMG-320-RTS.

<sup>&</sup>lt;sup>2</sup> Docket No. 02-GIMX-211-GIV, General Investigation of the Cold Weather Rule.

### 1 Q. ARE YOU SPONSORING ANY EXHIBITS IN CONNECTION WITH

- 2 **YOUR TESTIMONY?**
- 3 A. Yes, I am sponsoring Exhibits JTC-1 through JTC-3, which are attached to my
- 4 testimony. Exhibit JTC-1 is the capital structure supported in this case. Exhibit
- 5 JTC-2 shows the quarterly capital structure of Atmos Energy from fiscal year 2019
- 6 through the second quarter of fiscal year 2025. Exhibit JTC-3 reflects the currently-
- authorized capital structures in each of the Company's regulatory jurisdictions.

#### 8 Q. DO YOU ADOPT THESE EXHIBITS AND MAKE THEM PART OF YOUR

- 9 **TESTIMONY?**
- 10 A. Yes, I adopt the exhibits and make them a part of my testimony.
- 11 IV. CAPITAL STRUCTURE AND COST OF DEBT
- 12 Q. HOW IS ATMOS ENERGY ORGANIZED?
- 13 A. Atmos Energy conducts its utility operations in eight states through unincorporated
- operating divisions.
- 15 Q. DO THE COMPANY'S UNINCORPORATED DIVISIONS ISSUE THEIR
- 16 **OWN DEBT OR EQUITY?**
- 17 A. No. These operating divisions, including the Colorado-Kansas Division, are not
- separate legal entities. Instead, these unincorporated divisions collectively
- comprise the single legal entity that is Atmos Energy. Therefore, all debt or equity
- funding of the operations performed by the utility divisions must be (and is) issued
- by Atmos Energy as a whole, on a consolidated basis.

### 1 Q. SHOULD ATMOS ENERGY'S CONSOLIDATED CAPITAL STRUCTURE

- 2 BE USED AS THE BASIS FOR A CAPITAL STRUCTURE IN THIS
- 3 **PROCEEDING?**
- 4 A. Yes. Although this proceeding only affects the rates that may be charged by the
- 5 Company for its regulated utility operations in Kansas, the appropriate capital
- 6 structure for each of the Atmos Energy utility operating divisions, including its
- 7 Colorado-Kansas Division, is equivalent to the consolidated capital structure for
- 8 Atmos Energy as a whole. Atmos Energy's consolidated capital structure is
- 9 appropriate for use in setting rates for the Company's Kansas customers because
- Atmos Energy provides the debt and equity capital that supports the assets serving
- 11 those customers.
- 12 Q. WHAT IS ATMOS ENERGY'S CONSOLIDATED CAPITAL STRUCTURE
- 13 AS PRESENTED IN THIS PROCEEDING?
- 14 A. The capital structure that is appropriate for the Company's Kansas operations in
- this proceeding is set forth in Exhibit JTC-1. The capital structure as shown in
- Exhibit JTC-1 is the Company's actual capital structure as of March 31, 2025. This
- capital structure is most representative of the capital structure that will be in effect
- during the forecast period. As shown in Exhibit JTC-1, the Company's cost of
- capital for the forward-looking test period is comprised of 61.06% equity and
- 20 38.94% long-term debt.
- 21 Q. WHAT EMBEDDED COST OF LONG-TERM DEBT CAPITAL DID
- 22 ATMOS ENERGY USE IN CALCULATING RATES IN THIS CASE?
- A. As shown in the calculation on Exhibit JTC-1, Atmos Energy proposes a 4.13%

1 weighted average cost of long-term debt for setting rates in this case.

### 2 O. IS THIS THE WEIGHTED AVERAGE COST OF ALL LONG-TERM DEBT

### FOR THE PERIOD ENDED MARCH 31, 2025?

A. No. The proposed 4.13% weighted average cost of long-term debt excludes securitized debt issued in connection with Winter Storm Uri costs associated with our Kansas operations. This debt is held in a special purpose entity established for the sole purpose of securitizing Winter Storm Uri costs related to Kansas gas costs and is therefore properly excluded from the weighted average cost of debt for Atmos Energy.

# 10 Q. HAS THE COMPANY BEEN ACTIVE IN RAISING DEBT AND EQUITY 11 FROM THE CAPITAL MARKETS THE PAST FIVE YEARS?

Yes, the Company has been active in raising both long-term debt and equity from the capital markets the past five years. Please see Exhibit JTC-2, FY 2019 - FY 2025 Q2 Quarterly Capital Structure. As shown in this Exhibit, the Company's total capitalization has increased from \$9.0 billion to \$21.5 billion over this period, which has required the Company to raise capital from the market on several occasions. However, the Company has issued long-term debt and equity in such a manner that its debt-to-equity ratio has remained within the narrow range between 38% debt/62% equity and 42% debt/58% equity over this period. Being active in the debt and equity markets is important and necessary to support our ongoing capital investment in the safety and reliability of our gas distribution and transmission assets.

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1	Q.	DO YOU ANTICIPATE THAT THERE WILL BE ADDITIONAL DEBTANI

- 2 EQUITY ISSUED DURING THE PENDENCY OF THIS CASE DUE TO
- 3 THE COMPANY'S ONGOING SAFETY AND RELIABILITY CAPITAL
- 4 **INVESTMENT?**

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- Yes, therefore I propose to update the capital structure and embedded cost of longterm debt in my Rebuttal Testimony to reflect any additional financings and
  changes to the equity balances of the Company. However, as discussed above and
  historically demonstrated in Exhibit JTC-2, I do not expect any additional
  financings during this proceeding to have an appreciable impact on the relationship
  between debt and equity. The embedded cost of long-term debt, however, will likely
  increase due to current market rates being higher than the current embedded cost of
- 13 Q. HAS THE SHAREHOLDER EQUITY BALANCE AS OF MARCH 31, 2025,
- 14 BEEN ADJUSTED TO REFLECT THE ISSUANCE OF EQUITY DURING
- 15 THE BASE OR FORECAST PERIOD?

long-term debt.

- A. No. I believe that the Company's incremental external financing along with cash flow reinvested in the business will result in an overall capital structure that is in line with the period end March 31, 2025 capital structure. Therefore, no adjustment is warranted at this time; however, as noted above, in my Rebuttal Testimony I will
- 21 Q. WHY IS IT IMPORTANT FOR THE COMPANY TO CALCULATE ITS

update the capital structure through the latest quarter end available before filing.

- 22 REVENUE REQUIREMENT BASED UPON ITS ACTUAL CAPITAL
- 23 **STRUCTURE?**

Α. Safe and reliable service cannot be maintained at a reasonable cost if the Company does not have the financial flexibility and strength to access the competitive capital markets on reasonable terms. As highlighted in NARUC's Special Regulatory Training Initiative(RTI) Event, Utility Credit Ratings 101 Webinar<sup>3</sup>, the factors used by the credit rating agencies to evaluate utilities demonstrate that relying too 6 heavily on long-term debt financing creates risk, as does a regulatory environment that is not supportive of utilities' ability to recover their actual costs and to have the opportunity to earn a fair return on their investments, including the actual weighted cost of equity. Increasing the percentage of long-term debt in the Company's 10 capital structure negatively affects the key financial indicators relied upon by the credit rating agencies, which puts the Company at risk of a credit rating downgrade 12 and increases in the cost of debt financing, both of which adversely affect all of 13 Atmos Energy's stakeholder groups, including its customers, its shareholders and 14 its bondholders.

# CAN ATMOS ENERGY MAINTAIN SAFE AND RELIABLE SERVICE AT Q. A REASONABLE COST OVER THE LONG-TERM IF IT DOES NOT **RECOVER ITS ACTUAL COSTS?**

In order to provide safe, reliable and affordable service to its customers, Atmos Energy must meet the needs and serve the interests of its various stakeholders, including customers, shareholders and bondholders. The interests of these stakeholder groups are aligned with maintaining a healthy balance sheet, strong credit ratings and a supportive regulatory environment, so that the Company has

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https://maxxwww.naruc.org/forms/store/ProductFormPublic/RTI-Utility-Credit-Rating-101-2024-On-Demand?ticket=ST-1726951786-XNSAnKY4X0MNd5sZxqSwbTQrMS8gGpAo

access to capital on reasonable terms in order to make necessary investments to safely and reliably serve customers consistent with customers' expectations.

Moreover, stakeholder interests cannot be aligned if utilities do not have the financial flexibility and strength to access the competitive capital markets on reasonable terms. The authorization of a capital structure other than the Company's actual capital structure will weaken the Company's financial condition and its key financial indicators and adversely impact the Company's ability to address expenses and investment, to the detriment of customers and shareholders. Safe and reliable service for customers cannot be sustained over the long term if the interests of shareholders and bondholders and customers are not balanced.

# 11 Q. HAVE THE COMPANY'S REGULATORS IN JURISDICTIONS OUTSIDE 12 KANSAS RECOGNIZED ITS ACTUAL CAPITAL STRUCTURE?

- 13 A. Yes. Exhibit JTC-3 shows the most recently approved capital structures in each of
  14 Atmos Energy's jurisdictions.
- 15 Q. HAS THE COMPANY'S RELATIVELY STRONG EQUITY POSITION

  16 ALLOWED IT TO SUCCESSFULLY MANAGE VARIOUS FINANCIAL

  17 CHALLENGES OVER THE PAST SEVERAL YEARS?
  - Yes. For example, although the Tax Cut and Jobs Act ("TCJA") reduced the federal income tax rate and created a need to return deferred taxes to customers resulting in a negative impact to the Company's cash flow, the Company's relatively strong equity position, among other things, allowed it to adjust its external financing needs, return funds to customers and avoid a downgrade by ratings agencies. Similarly, when the COVID-19 Pandemic resulted in Emergency Orders being

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issued across all of the Company's service territories to not disconnect customers for non-payment, the Company was able to raise additional debt early in the pandemic to maintain its liquidity during uncertain times so that customers in risk of disconnection received the benefits of the Company's financial strength. Lastly, one of the most important examples of the financial strength that the Company's balance sheet brings at its current capitalization can be found in the Company's response to Winter Storm Uri. Despite being put on credit watch at the time by both ratings agencies, the Company nevertheless was able to quickly raise \$2.2 billion to fund extraordinary gas cost on very short notice and increase our liquidity through a new short-term credit facility. Without the Company's strong financial balance sheet in place, these examples could have had serious long-term detrimental effects to the Company's customers. The Commission's current equity cap on the Company's capital structure is not consistent with the financial strength required by the Company to continue the provision of safe and reliable service to its customers in Kansas.

#### Q. HAS MOODY'S CREDIT OPINION CHANGED RECENTLY?

Yes. On April 10, 2024, Moody's changed the Company's Outlook to "negative," stating that Moody's "had previously expected that the company's financial profile would recover after it exhibited lower than historical metrics [CFO pre-WC] in 2022 and 2023." Then on April 7, 2025, Moody's downgraded the Company from A1 to A2. In their report Moody's noted that "[a]s of the last twelve months ended 31 December 2024, the metric [CFO pre-WC] was about 20.5%, still strong but a material decline from the historical ratio in the 25% range." This tells me that

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1	maintaining	our capital	structure at th	e levels sho	wn in Exh	ibit JTC-2	continues to
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- 2 be appropriate for balancing our need to invest in ongoing safety and reliability
- with the need to raise incremental funds from the capital markets on favorable terms
- 4 to meet various financial challenges that may arise.
- 5 Q. WOULD SETTING THE COMPANY'S CAPITAL STRUCTURE AT
- 6 ANYTHING OTHER THAN ACTUAL BE BENEFICIAL TO THE
- 7 **CUSTOMER?**
- 8 A. No. The Company's capital structure and its cost of debt result from the competitive
- 9 forces of the capital markets. Equity and debt investors can choose to invest their
- funds elsewhere or require higher prices for capital if they do not perceive they are
- being fairly treated. A regulatory environment that does not permit a utility to have
- a reasonable opportunity to earn a fair return on its prudently incurred cost leads to
- poor results in the long run, that is, potentially higher costs and degraded service.
- Supporting utilities that invest in their energy infrastructure in a prudent and
- efficient manner should be encouraged.
- 16 Q. DOES ATMOS ENERGY'S ORGANIZATIONAL STRUCTURE SUPPORT
- 17 CALCULATING THE RATES IN KANSAS ON THE COMPANY'S
- 18 **ACTUAL CAPITAL STRUCTURE?**
- 19 A. Yes. Atmos Energy conducts utility operations in eight states through
- 20 unincorporated divisions, including the Company's Kansas operations.
- 21 Q. WHY IS ATMOS ENERGY'S NON-HOLDING COMPANY
- 22 ORGANIZATIONAL STRUCTURE AN IMPORTANT DISTINCTION
- 23 COMPARED TO ATMOS ENERGY'S PROXY GROUP?

- 1 A. Unlike most other utilities that operate in Kansas, the actual capital costs upon
- which Atmos Energy's Kansas rates are calculated are not complicated by differing
- 3 levels of debt/equity ratios at the holding company level versus the subsidiary level
- 4 and accurately reflect market forces, as I mentioned above.
- 5 Q. ARE THERE ADVANTAGES TO ATMOS ENERGY'S FINANCIAL
- 6 **STRUCTURE?**
- 7 A. Yes. Operating all of the regulated distribution and transmission business within
- 8 Atmos Energy saves administrative costs, results in a more transparent business
- 9 model, provides more transparency in financial reporting, and allows us to focus on
- the operational needs of the gas distribution and transmission business and how
- best to meet the financing needs as we progress through our investment in natural
- gas infrastructure for system replacement and growth.
- V. CONCLUSION
- 14 Q. DO YOU BELIEVE THAT THE CAPITAL STRUCTURE YOU HAVE
- 15 PRESENTED REPRESENTS THE MOST REASONABLE ESTIMATE OF
- 16 CAPITAL STRUCTURE AND LONG-TERM DEBT COSTS FOR THE
- 17 TEST PERIOD USED IN THIS PROCEEDING?
- 18 A. Yes. The actual capital structure and the long-term debt costs is the best projection
- of the Company's capitalization costs for use in the cost of service presented by
- 20 Company Witness Waller.
- 21 Q. DOES THIS CONCLUDE YOUR TESTIMONY?
- 22 A. Yes.

#### VERIFICATION

STATE OF TEXAS	
STATE OF TEXAS	
COUNTY OF DALLAS	3

Joe T. Christian, being duly sworn upon his oath, deposes and states that he is a consultant for Atmos Energy Corporation; that he has read and is familiar with the foregoing Direct Testimony filed herewith; and that the statements made therein are true to the best of his knowledge, information and belief.

Subscribed and sworn before me this 6 day of July

My appointment expires: September 1, 2028

Giselle R Heroy My Commission Expires

# ATTACHMENT JTC-1 TESTIMONY EXPERIENCE OF JOE CHRISTIAN

### 1 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE REGULATORY

## **COMMISSIONS?**

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Yes, I filed testimony before the **Colorado Public Utilities Commission** numerous 3 A. times, including Atmos Energy general rate case proceedings; gas prudence 4 reviews;<sup>2</sup> a Phase II class cost of service/rate design proceeding;<sup>3</sup> a transportation 5 terms & conditions proceeding;<sup>4</sup> an upstream gas transportation matter;<sup>5</sup> a 6 complaint proceeding regarding upstream gas transportation;<sup>6</sup> an Advanced 7 Metering Infrastructure surcharge matter;<sup>7</sup> a proposal to extend the pilot related to 8 9 recovering uncollectible gas costs through the Gas Cost Adjustment ("GCA") mechanism;8 the Atmos Energy's proposal to put into effect a System Safety and 10 Integrity Plan; and the Atmos Energy's application for a Certificate of Public 11 Convenience and Necessity to implement the Greeley Building Project. <sup>10</sup> I have 12 submitted testimony before the Kansas Corporation Commission ("KCC") in 13 five general rate case proceedings<sup>11</sup> and provided oral comments to the KCC in a 14 15 rules investigation.<sup>12</sup> I have submitted testimony before the **Kentucky Public Service Commission** in four general rate cases. <sup>13</sup> I have submitted testimony 16

<sup>&</sup>lt;sup>1</sup> Proceeding Nos. 00S-668G, 09AL-507G, 13AL-0496G, 14AL-0300G, 15AL-0299G, 17AL-0429G, 22AL-0348G.

<sup>&</sup>lt;sup>2</sup> Proceeding Nos. 00P-296G and 03P-229G.

<sup>&</sup>lt;sup>3</sup> Proceeding No. 02S-411G.

<sup>&</sup>lt;sup>4</sup> Proceeding No. 02S-442G.

<sup>&</sup>lt;sup>5</sup> Proceeding No. 04A-275G.

<sup>&</sup>lt;sup>6</sup> Proceeding No. 08F-033G.

<sup>&</sup>lt;sup>7</sup> Proceeding No. 10AL-822G.

<sup>&</sup>lt;sup>8</sup> Proceeding No. 12AL-1003G.

<sup>&</sup>lt;sup>9</sup> Proceeding No. 12AL-1003G.

<sup>10</sup> Tocccuing No. 12AL-11390

<sup>&</sup>lt;sup>10</sup> Proceeding No. 13A-0153G.

<sup>&</sup>lt;sup>11</sup> Docket Nos. 03-ATMG-1036-RTS, 08-ATMG-280-RTS, 10-ATMG-495-RTS, 12-ATMG-564-RTS, 14-ATMG-320-RTS

<sup>&</sup>lt;sup>12</sup> Docket No. 02-GIMX-211-GIV, General Investigation of the Cold Weather Rule.

<sup>&</sup>lt;sup>13</sup> Case Nos. 2017-00349, 2018-00281, 021-00214, and 2024-00276.

# ATTACHMENT JTC-1 TESTIMONY EXPERIENCE OF JOE CHRISTIAN

before the Louisiana Public Service Commission to amend our formula rate
making tariffs to reduce lag related to system integrity investment as well as
reaffirm our existing formula rate making tariffs. <sup>14</sup> I submitted testimony in
Mississippi Public Service Commission ("MPSC) Docket No. 2013-UN-023
("023") <sup>15</sup> , MPSC Docket No. 2014-UN-117 ("117") <sup>16</sup> , and MPSC Docket No.
2015-UN-049 ("049"). <sup>17</sup> I have submitted testimony before the <b>Tennessee Public</b>
Utility Commission <sup>18</sup> as well as submitting oral testimony in a rule making related
to the evaluation of utility acquisitions. 19

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<sup>&</sup>lt;sup>14</sup> Docket No. U-32987 (2014), Docket No. U-35535 (2020), Docket No. U-35937 (2022) and Docket No. U-36658 (2023).

<sup>&</sup>lt;sup>15</sup> The 023 docket was a proposal to establish a supplemental growth rider to encourage industrial development.

<sup>&</sup>lt;sup>16</sup> The 117 docket was a proposal by the Company to establish a system integrity plan and establish a rural development pilot program.

<sup>&</sup>lt;sup>17</sup> The 049 docket was a proposal to establish a System Integrity Rider ("SIR") to recover on the system integrity portion of the capital budget and to timely recover the depreciation and property taxes specifically associated with its overall system integrity spending.

<sup>&</sup>lt;sup>18</sup> Docket Nos. 14-00146 and 18-00034.

<sup>&</sup>lt;sup>19</sup> Docket No. 20-00025.

# Atmos Energy Corporation Kansas Distribution System Filing Requirements Capital and Cost of Money Test Year Ending March 31, 2025

Line No.	Description	Reference	В	eginning Balance 3/31/2024	Ending Balance 3/31/2025		Rate Base Allocation
	(a)	(b)		(c)	(d)	-	(e)
1	Long-Term Debt Capital		\$	7,396,775,416	\$ 8,377,362,190	\$	130,523,000
2	Equity Capital			11,618,639,177	13,137,965,351		204,667,036
3 4	Total Capital	(Line 1 + Line 2)	\$	19,015,414,593	\$ 21,515,327,541	\$	335,190,036
5 6	Long-Term Debt Capital Percentage	(Line 1 ÷ Line 4)		38.90%	38.94%		
7	Equity Capital Percentage	(Line 2 ÷ Line 4)		61.10%	61.06%		
8 9 10	Total Capital Percentage	(Line 6 + Line 7)		100.00%	100.00%	:	
11	Long-term Debt Rate	WP 7A LTD Rate-Test Period, Column (p), Line 37			4.13%		
12 13	Cost of Equity	D. D'Ascendis			10.80%		
14	Weighted Cost of Capital - Long-Term Debt	(Line 6 × Line 11)			1.61%		
15 16	Weighted Cost of Capital - Equity	(Line 7 × Line 12)			6.59%		
17	Total Cost of Capital	(Line 14 + Line 15)		:	8.20%	RO	R

Atmos Enery Corporation
Capital Structure (including short-term debt)
For FY 2019 Q1 (12/2018) to FY 2025 Q2 (03/2025)

		Capitalization Percentage				
Line #	Quarter Ended	Equity	Long-Term Debt	Short-Term Debt	Total Capitalization	
	(a)	(b)	(c)	(d)	(e)	
1	Dec-18	59.4%	40.6%	0.00%	100.0%	
2	Mar-19	60.1%	39.9%	0.00%	100.0%	
3	Jun-19	60.2%	39.0%	0.80%	100.0%	
4	Sep-19	59.0%	36.2%	4.77%	100.0%	
5	Dec-19	58.6%	41.4%	0.00%	100.0%	
6	Mar-20	58.2%	39.9%	1.85%	100.0%	
7	Jun-20	58.8%	41.2%	0.00%	100.0%	
8	Sep-20	60.0%	40.0%	0.00%	100.0%	
9	Dec-20	58.5%	41.5%	0.00%	100.0%	
10	Mar-21	60.4%	39.6%	0.00%	100.0%	
11	Jun-21	60.3%	39.7%	0.00%	100.0%	
12	Sep-21	60.7%	39.3%	0.00%	100.0%	
13	Dec-21	59.2%	40.8%	0.00%	100.0%	
14	Mar-22	61.1%	38.9%	0.00%	100.0%	
15	Jun-22	61.9%	38.1%	0.00%	100.0%	
16	Sep-22	61.5%	37.3%	1.21%	100.0%	
17	Dec-22	60.2%	39.8%	0.00%	100.0%	
18	Mar-23	61.1%	38.9%	0.00%	100.0%	
19	Jun-23	62.0%	38.0%	0.00%	100.0%	
20	Sep-23	61.7%	36.9%	1.37%	100.0%	
21	Dec-23	60.4%	39.6%	0.00%	100.0%	
22	Mar-24	61.1%	38.9%	0.00%	100.0%	
23	Jun-24	61.2%	38.8%	0.00%	100.0%	
24	Sep-24	61.1%	38.9%	0.00%	100.0%	
25	Dec-24	60.4%	39.6%	0.00%	100.0%	
26	Mar-25	61.1%	38.9%	0.00%	100.0%	
27	26 Q Simple Average	60.32%	39.30%	0.38%	100.00%	
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29	Capitalization as of:					
30	Q1 FY 2019	5,348,194,760	3,659,778,860	-	9,007,973,620	
31	Q2 FY 2025	13,137,965,351	8,377,362,190	-	21,515,327,541	

# **Atmos Energy Corporation Authorized Capital Structures**

(as of 06/30/2025)

			Case			<b>Authorized Capital</b>
Line #	l	Division	Description	Docket No.	<b>Decision Date</b>	Structure (Debt / Equity)
	(a)		(b)	(c)	(d)	(e)
1	APT		2023 Rate Filing	OS-23-00013758	12/13/2023	40 / 60
2	Colorado		2022 Rate Filing	22AL-0348G	5/14/2023	42-45 / 58-55
3	Kansas		2022 Rate Filing	23-ATMG-359-RTS	5/9/2023	[1]
4	Kentucky		2021 Rate Filing	2021-00214	5/19/2022	44.5 / 54.5
5	Louisiana		2023 RSC	U-37185	7/1/2024	42 / 58
6	Mid-Tex	Dallas Only	2024 DARR		6/1/2025	40 / 60
7		Mid-Tex Cities	2023 RRM	NA	10/1/2024	42 / 58
8		Mid-Tex Environs	2024 SOI	OS-24-00019196	6/17/2025	39 / 61
9	Mississippi		2025 SRF	2005-UN-0503	12/1/2024	39 / 61
10			2025 SIR	2015-UN-049	12/1/2024	39 / 61
11	Tennessee		2024 ARM	25-00007	6/1/2025	39 / 61
12	Virginia		2023 Rate Filing	PUE-2023-00008	12/1/2023	39 / 61
13	West Texas	WT Cities	2024 SOI	OS-24-00018879	6/1/2025	39 / 61
14		WT Environs	2024 SOI	OS-24-00018879	6/1/2025	39 / 61