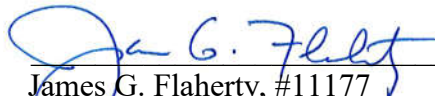


<sup>1</sup>Order Granting Joint Motion to Renew System Integrity Plan Tariff filed May 22, 2025, Docket No. 19-ATMG-525-RTS.

Utility Ratepayers Board ("CURB") to review the proposed seven-year plan, the specific projects proposed for the sixth SIP Plan Year, the prioritization method used by Atmos Energy to identify the specific projects, and the goals to be achieved by Atmos Energy under the plan. The Company will also be prepared to timely respond to any discovery issued by Staff and CURB.

WHEREFORE, Atmos Energy requests that pursuant to provisions of its SIP tariff the Commission approve the attached SIP Plan objectives and goals for the seven-year period as set forth in the attached 2026 SIP Plan and the SIP Projects proposed for SIP Plan Year 6.

THIS, the 1<sup>st</sup> day of July 2025.



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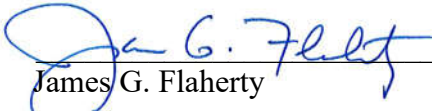
Attorneys for Atmos Energy Corporation

## 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 Corporation named in the foregoing System Integrity Program Plan and is duly authorized to make this affidavit; that he has read the foregoing 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 1<sup>st</sup> day of July, 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 1<sup>st</sup> day of July, 2025, addressed to:

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James G. Flaherty

# ATMOS ENERGY CORPORATION'S 2026 SYSTEM INTEGRITY PROGRAM PLAN

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

1. Listed below are the details for the sixth plan year 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. The tool used by Atmos Energy to prioritize the replacement of obsolete pipes will also be discussed with the Kansas Corporation Commission ("Commission") Staff ("Staff") and the Citizens' Utility Ratepayer Board ("CURB").

2. The replacement of low-pressure systems and bare steel are a priority or goal for the seven-year plan. In addition, per the settlement agreement in Docket No. 23-ATMG-359-RTS ("359 Docket"), the Company agreed to modify the current risk assessment model to place greater weight on the risk associated with bare steel service lines.

## II. SIP PLAN YEAR 6 PROPOSED PROJECTS

3. The following list of projects and their estimated costs is proposed for Year 6 of Atmos Energy's SIP plan.

### Plan Year 6

		Retire Miles				Services		
City	Area	Score	Known	Total	Install Miles	Replace	Total	Est. Cost
			Bare Steel					
Chetopa	Elm St: US-59 - N 2 <sup>nd</sup>	18.13	3.16	4.68	3.81	136	180	\$2,759,391
Caney	E 3 <sup>rd</sup> Ave: High - Smith	16.56	3.2	4.18	3.81	184	204	\$4,227,613
Olathe	Spruce St: K-7 - Kansas Ave	15.09	0.56	2.65	1.8	165	166	\$1,636,983
Coffeyville	1 <sup>st</sup> St: Buckeye to Walnut	14.15	4.37	5.34	3.54	235	273	\$2,636,281
<b>Year 6 Total</b>			<b>11.29</b>	<b>16.85</b>	<b>12.96</b>	<b>720</b>	<b>823</b>	<b>\$11,260,268</b>

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

**(a) Project 1- Chetopa: Elm St**

Project 1 will replace the low-pressure distribution system in one of two risk ranked sections in Chetopa. The project is located north of Maple Street from 1st Street to 11th Street. The pipe is in a class 3 location and is low pressure. The higher risk score is being driven by the bare steel main and service leak history, pipe issues, CP history, priority structures, and leak response time. The majority of the replacement is bare steel or vintage plastic.

**(b) Project 2 - Caney: E 3rd Ave**

Project 2 will replace the low-pressure distribution system in one of four risk ranked sections in Caney. The project is located from East Street to High Street east-west and Taylor Street to 6th Street north-south. The pipe is in a class 3 location and is low pressure. The higher risk score is being driven by the bare steel main and service leak history, pipe issues, CP history, priority structures, and leak response time. The majority of the replacement is bare steel or vintage plastic.

**(c) Project 3 - Olathe: Spruce St**

Project 3 will replace the low-pressure distribution system in one of eight risk ranked sections in Olathe. The project is located from Walnut Street to Clinton Street east-west and Prairie Street to Santa Fe Street north-south. The pipe is in a class 3 location and is low pressure. The higher risk score is being driven by the bare steel main leak history, pipe issues, CP history, priority structures, and population density. The majority of the replacement is bare steel or vintage plastic.

**(d) Project 4 - Coffeyville: 1st St**

Project 4 will replace the low-pressure distribution system in one of two risk ranked sections in Coffeyville. The project is located from Walnut Street to Buckeye Street east-west and Martin Street to 1<sup>st</sup> Street north-south. The pipe is in a class 3 location and is low pressure. The higher risk

score is being driven by the bare steel main and service leak history, pipe issues, CP history, and population density. The majority of the replacement is bare steel or vintage plastic.

### III. YEARS SEVEN-TWELVE GENERAL PLAN OF SIP PROJECTS

5. Below is a list of proposed projects and their estimated costs for years 7-12 under Atmos Energy's proposed SIP plan.<sup>1</sup>

#### **Plan Years 7-12**

City	Risk Area	Risk Score	Known Bare Steel	Est. Costs
Elk City	City-Wide LP	14.09	2.48	\$1,930,698
Chetopa	Locust St: US-59 - N 2nd St	13.13	2.86	\$4,311,015
Olathe	Chestnut: Johnston - Santa Fe	11.24	1.58	\$3,355,410
<b>Year 7 Total</b>		<b>6.92</b>		<b>\$9,597,122</b>
Sedan	Laurel St: Oak - Dora	10.73	4.09	\$5,395,720
Independence	Myrtle St: River - 6th	9.69	1.82	\$2,285,426
Longton	Wyandotte: 4th - 8th	9.66	1.20	\$740,600
Eudora	10th St: Ash - Cedar	9.50	0.96	\$1,339,337
Tyro	City-Wide LP	9.48	0.81	\$645,508
<b>Year 8 Total</b>		<b>8.88</b>		<b>\$10,406,591</b>
Spring Hill	Jefferson St: Allen - South	9.42	2.23	\$3,864,542
Bonner Springs	Downtown & <u>Neconji</u>	8.25	2.02	\$3,202,800
Olathe	LP North of Prairie	8.04	0.25	\$1,280,207
Independence	Walnut: Poplar - Penn	7.99	3.03	\$2,661,906
<b>Year 9 Total</b>		<b>7.54</b>		<b>\$11,009,456</b>
Fall River	City-Wide LP	7.66	2.79	\$3,330,986
<u>Savonburg</u>	City-Wide LP	7.65	0.56	\$475,413
Independence	Laurel: N 20th - N 10th	7.54	3.23	\$2,742,243
Olathe	Loula: Santa Fe - State	7.46	1.31	\$2,018,125
Olathe	Dennis Ave: Kansas Ave - I-35	7.34	1.91	\$2,837,139
<b>Year 10 Total</b>		<b>9.81</b>		<b>\$11,403,908</b>
Independence	US-75: Locust - Sycamore	6.78	3.64	\$3,252,782

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<sup>1</sup>Project estimates are based on the current terms of the SIP, recovery of any costs exceeding the total authorized amount of \$75 million will not be requested through the SIP tariff.

Coffeyville	14th - Eldridge - Willow - US-169	6.77	2.95	\$1,998,519
Caney	6th Ave: Foreman to US-75	6.75	4.09	\$6,203,199
<b>Year 11 Total</b>		<b>10.69</b>		<b>\$11,454,499</b>
Chautauqua	City-Wide LP	6.57	2.34	\$4,592,053
Caney	Howard Ave: Pawn - Main	6.54	2.62	\$4,634,599
Peru	City-Wide LP	6.33	1.48	\$1,499,015
<b>Year 12 Total</b>		<b>6.44</b>		<b>\$10,725,667</b>
<b>Total Years 7-12</b>		<b>50.28</b>		<b>\$64,597,243</b>

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 SIP plan.