

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

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

CURB'S MOTION FOR DISCOVERY ORDER & PROTECTIVE ORDER

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB"), hereby moves the Corporation Commission of the State of the Kansas ("Commission") for an issuance of a Discovery Order and Protective Order in the above-captioned proceeding.

1. On January 24, 2018, Atmos Energy Corporation ("Atmos Energy") filed its Preliminary Plan for the Systematic Accelerated Replacement of Bare Steel Service/Yard Lines, Cast Iron Mains, and Bare Steel Mains within class 3 locations with the Kansas Corporation Commission.

2. On February 8, 2018 the Commission granted CURB intervention in the above mentioned docket.

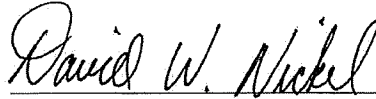
3. A Discovery Order is necessary to protect the due process rights of CURB in this docket and vital for CURB to be able to evaluate Atmos Energy's compliance with Docket No. 15-GIMG-343-GIG with respect to Atmos Energy's 2020 Annual Report as filed on April 27, 2020.

4. K.A.R. 82-1-234a authorizes a Discovery Order in this docket. Moreover, a Discovery Order will not unduly burden any party. A Discovery Order will help expedite resolution of the issues involved in this docket. Discovery will be limited to matters clearly relevant to this docket.

5. Discovery responses may contain confidential information. CURB is requesting the Commission issue a Discovery Order and Protective Order in this docket to allow CURB and its consultant access to the full information contained in this filing.

WHEREFORE, CURB respectfully requests the Commission grant its Motion for Discovery Order and Protective Order in this Docket.

Respectfully submitted,



David W. Nickel, Consumer Counsel #11170

Todd E. Love, Attorney #13445

Joseph R. Astrab, Attorney #26414

Citizens' Utility Ratepayer Board

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VERIFICATION

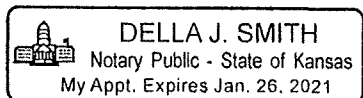
STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

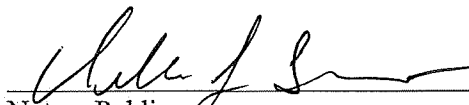
I, David W. Nickel, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.



David W. Nickel

SUBSCRIBED AND SWORN to before me this 30th day of April, 2020.





Notary Public

My Commission expires: 01-26-2021.

CERTIFICATE OF SERVICE

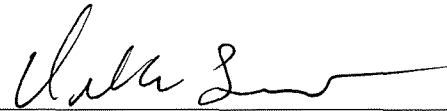
18-ATMG-316-CPL

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 30th day of April, 2020, to the following:

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