

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of Atmos Energy Corporation Filing)
Compliance Reports and Information as Prescribed)
by Commission Order Dated December 3, 2010, in) Docket No. 11-ATMG-799-CPL
Docket No. 06-GIMX-181-GIV)

COMPLIANCE FILING OF
ATMOS ENERGY CORPORATION

COMES NOW Atmos Energy Corporation ("Atmos") and pursuant to the requirements of the Commission's Order issued in Docket No. 06-GIMX-181-GIV ("181 Docket") on December 3, 2010, Atmos is providing the following information in compliance with the Commission's Order:

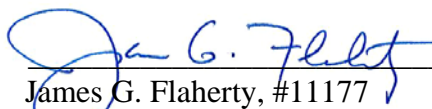
1. Cost Allocation Manual dated April 1, 2019 (requirement A1), Exhibit 1;
2. A complete, detailed organizational chart identifying each regulated utility and each associate company (requirement B1), Exhibit 2;
3. A detailed description of the activities and business conducted at each non-utility associated company (requirement B2), Exhibit 3;
4. An organizational chart of personnel that includes a list of all directors, corporate officers, and other key personnel shared by any jurisdictional public utility and any non-utility associate company or holding company, if any, along with a description of each person's duties and responsibilities to each entity (requirement B3), Exhibit 4;
5. Summaries of each mortgage, loan document and debt agreement including a discussion of the type of collateral or security pledged to support the debt. The utility will also describe any loan or debt agreement taken out to finance an unregulated affiliate that encumbers utility property or cash-flow for security (requirement B4), Exhibit 5;
6. To the extent financial separations are maintained for either legal or financial accounting purposes and at a level in which financial statements are reasonably capable of being

produced by the utility's accounting system, each jurisdictional public utility shall file income statements, balance sheets and cash flow statements for (1) consolidated utility operations; (2) consolidated non-regulated operations; and (3) consolidated corporate financials (requirement B5), Exhibit 6;

7. To the extent financial separations are maintained for either legal or financial accounting purposes and at a level in which financial statements are reasonably capable of being produced by the utility's accounting system, each jurisdictional public utility shall file a summary of financial ratios as of the end of the last completed fiscal year, as described by way of example in the attachment to these rules and consistent with the method used to report such information to the principal bond rating agency or Standard & Poors for (1) consolidated utility operations; (2) consolidated non-regulated operations; and (3) consolidated corporate financials (requirement B6), Exhibit 7; and

8. Copyright protected analyst reports and rating agency reports (requirement C3), Exhibit 8, are being provided in a separate compact disk to the Commission Staff as part of this Compliance Filing. Because these reports are copyright protected, Atmos requests the reports not be included on the Commission's docket webpage.

WHEREFORE, Atmos requests the information provided be accepted by the Commission in compliance with the reporting requirements in the 181 Docket.

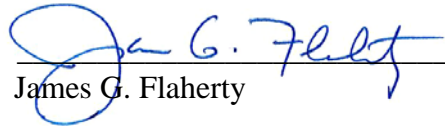


James G. Flaherty, #11177
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VERIFICATION

STATE OF KANSAS)
)ss:
COUNTY OF FRANKLIN)

James G. Flaherty, of lawful age, being duly sworn upon oath, deposes and says that he is attorney for the within named applicant, that he has read the above and foregoing Compliance Filing, and the statements contained therein are true.



James G. Flaherty

SUBSCRIBED AND SWORN to before me this 30th day of May, 2019.





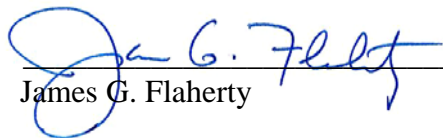
Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 30th day of May, 2019, addressed to:

Amber Smith
a.smith@kcc.ks.gov
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027



James G. Flaherty

EXHIBIT 1

ATMOS ENERGY CORPORATION
COST ALLOCATION MANUAL
April 1, 2019

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1. Introduction:

a. Corporate Structure

Atmos Energy Corporation (Atmos or the Company) operates its Regulated Operations through seven operating divisions in 8 states. The seven operating divisions and their service areas are:

<u>Division</u>	<u>Service Area</u>
Atmos Energy Colorado-Kansas Division	Colorado, Kansas
Atmos Energy Kentucky/Mid-States Division	Kentucky, Tennessee, Virginia
Atmos Energy Louisiana Division	Louisiana
Atmos Energy Mid-Tex Division	Texas, including the Dallas/Fort Worth metropolitan area
Atmos Energy Mississippi Division	Mississippi
Atmos Energy West Texas Division	West Texas
Atmos Pipeline – Texas Division	Intrastate pipeline business in Texas

These operating divisions are not subsidiaries or separate legal entities. Therefore, by definition, they cannot be considered affiliates of Atmos.

Technical and support services are provided to the operating divisions by centralized shared services departments primarily located at the Atmos headquarters in Dallas. These centralized functions currently include, but are not limited to, accounting, gas supply, human resources, information technology, legal, rates and customer support. The costs for these shared services are allocated to the operating divisions. In addition, for operating divisions that operate in more than one rate jurisdiction, costs from an operating division's general office are allocated to separate rate divisions within the operating division.

Atmos Energy Holdings, Inc. is a wholly owned subsidiary of Atmos. Atmos Energy Holdings and its various wholly owned subsidiaries are separate legal entities and are considered affiliates of Atmos.

The Company's current legal entity organization chart is contained in Appendix A.

Note that the descriptions contained herein do not address tariffed services.

b. Accounting:

Atmos' account coding structure enables it to capture the costs for allocable activities. Expenses, assets, and liabilities for Atmos' shared services and other operating division general office divisions are coded to applicable location codes and cost centers as necessary, and are then allocated to the appropriate rate divisions based upon the methodologies described herein. Allocations recorded in the books and records of the Company are primarily for management control purposes and may not reflect the allocation methodology used for rate making purposes.

Atmos' account coding structure is as follows:

XXX. XXXX. XXXX. XXXXX. XXXXXX. XXXX

Company	Cost Center	FERC Account	Sub-Account	Service Area	Future Use	
3 digit	4 digit	4 digits	5 digits	6 digits	4 digits	

Within the above coding structure, "Company" and "Cost Center" are primarily utilized for internal management responsibility reporting purposes for Atmos' operating divisions. The terms "Company" and "Cost Center" are defined in the glossary beginning below. Utilization of the "Company" or "Cost Center" fields is not suitable for meaningful financial or regulatory reporting purposes.

The FERC account field contains the three-digit FERC USOA account plus one extension digit which in some cases is utilized by the FERC USOA.

The first three digits of the Service Area field are the primary coding utilized for cost allocations within Atmos and is generally referred to as "rate division number". This portion of the field denotes Atmos' various rate divisions as well as the Company's various shared services and operating division general office divisions. These codes are the primary source of information for regulatory reporting and rate activity. The remaining three digits represent "town" location which is utilized only for some accounts. Atmos Pipeline-Texas uses the final three digits of the service area to represent the actual storage or compressor facility; however, this is used for O&M expenses only.

c. Glossary of Terms:

The following terms are defined for purposes of this document only:

Affiliate - One or more of Atmos' subsidiaries.

Below the Line - Amounts which are generally not included in an analysis of costs from which gas service rates are derived.

Company - In general terms, it refers to Atmos Energy Corporation. Within the context of the account coding string, this term represents an operating division, wholly-owned subsidiary or other legal entity controlled by Atmos.

Composite Factor - The Company's general allocation factor which is derived for each applicable area based upon the simple average of gross plant in service, average number of customers and direct operation and maintenance expenses for each applicable area.

Corporate Headquarters - The headquarters of Atmos Energy Corporation located in Dallas, Texas.

Cost Centers - Account coding which denotes an area of cost responsibility. This coding is used primarily for management purposes.

Customer Factor - The Company's general allocation factor which is derived based on the average number of customers of the Operating Divisions that receive allocable costs for the services provided.

Direct Charges - Those charges which may originate in a shared services department or operating division general office division or a rate division which are booked directly to the applicable rate division.

FERC USOA - The Uniform System of Accounts as prescribed by the Federal Energy Regulatory Commission.

Municipal Jurisdiction - For Atmos' utility operations in Texas, each municipality which it serves has original jurisdiction over rates.

Operating Division - An unincorporated division of Atmos Energy Corporation that contains at least one rate division that is responsible for the management of the Company's Regulated Operations. Operating divisions are not subsidiaries or separate legal entities. As such, they do not have separate equity or debt structures. Additionally, the divisions do not keep separate books and records. Operating divisions with multiple rate divisions have one operating division general office rate division in addition to rate divisions corresponding to regulatory jurisdictional areas.

Operating Division General Office - Administrative offices that are located outside of shared service offices which serve as the base of operations and central office for each "operating division."

Rate Division - Often referred to as an operating rate division, it denotes Atmos' regulatory jurisdictions that are defined by state and geographic boundaries. The term also denotes Atmos' various shared services and operating division general office divisions. These divisions are the primary source for regulatory reporting and rate activity for an area in which rates have been set by a regulatory authority such as the Colorado Public Utilities Commission. Rate divisions are identifiable in the Company's account coding string. As such, costs are accumulated within the general ledger and represent the sum of direct costs plus costs allocated to the rate division.

Regulated Operations - Represents the Company's six regulated natural gas distribution operating divisions operating in 8 states and the Company's regulated intrastate pipeline operations in the State of Texas.

Service Area - The portion of the Company's account coding structure of which the first three digits denote rate division. The last three digits of this code denote "town" which is used only in certain instances. Atmos Pipeline-Texas uses the final three digits of the service area to represent the actual storage or compressor facility; however, this is used for O&M expenses only.

Shared Services - The Company's functions that serve multiple rate divisions. These services include departments such as legal, billing, call center, accounting, information technology, human resources, gas supply, rates administration among others. Shared

Services is comprised of Shared Services – General Office and Shared Services – Customer Support

Shared Services – Customer Support – Shared Services functions that include billing, customer call center functions and customer support related services.

Shared Services – General Office – Shared Services functions that include all other functions not encompassed by Shared Services – Customer Support.

The following are divisions of Atmos Energy Corporation:

Atmos Energy Colorado-Kansas Division is a regulated operating division that serves approximately 170 communities throughout Colorado and Kansas, including the cities of Olathe, Kansas, a suburb of Kansas City and Greeley, Colorado, located near Denver.

Atmos Energy Kentucky/Mid-States Division is a regulated operating division that operates Kentucky, Tennessee and Virginia. The service areas in these states are primarily rural; however, this division serves Franklin, Tennessee, and other suburban areas of Nashville.

Atmos Energy Louisiana Division is a regulated operating division that serves nearly 300 communities, including the suburban areas of New Orleans, the metropolitan area of Monroe and western Louisiana. Direct sales of natural gas to industrial customers in Louisiana, who use gas for fuel or in manufacturing processes, and sales of natural gas for vehicle fuel are exempt from regulation and are recognized in our Atmos Energy Louisiana Industrial Gas segment.

Atmos Energy Mid-Tex Division is a regulated operating division that serves approximately 550 incorporated and unincorporated communities in the north-central, eastern and western parts of Texas, including the Dallas/Fort Worth Metroplex. The governing body of each municipality we serve has original jurisdiction over all gas distribution rates, operations and services within its city limits, except with respect to sales of natural gas for vehicle fuel and agricultural use. The Railroad Commission of Texas (RRC) has exclusive appellate jurisdiction over all rate and regulatory orders and ordinances of the municipalities and exclusive original jurisdiction over rates and services to customers not located within the limits of a municipality.

Atmos Energy Mississippi Division is a regulated operating division that serves about 110 communities throughout the northern half of the state, including the Jackson metropolitan area.

Atmos Energy West Texas Division is a regulated operating division that serves approximately 80 communities in West Texas, including the Amarillo, Lubbock and Midland areas. Like our Mid-Tex Division, each municipality we serve has original jurisdiction over all gas distribution rates, operations and services within its city limits, with the RRC having exclusive appellate jurisdiction over the municipalities and exclusive original jurisdiction over rates and services provided to customers not located within the limits of a municipality.

Atmos Pipeline – Texas Division is one of the largest intrastate pipeline operations in Texas with a heavy concentration in the established natural gas producing areas of central, northern and eastern Texas, extending into or near the major producing areas of the Barnett Shale, the Texas Gulf Coast and the Delaware and Val Verde Basins of West Texas. APT provides transportation and storage services to our Mid-Tex Division, other third party local distribution companies, industrial and electric generation customers, as well as marketers and producers. As part of its pipeline operations, APT manages five underground storage reservoirs in Texas.

The following are affiliates of Atmos Energy Corporation:

Blueflame Insurance Services, LTD is a wholly-owned subsidiary of Atmos Energy Corporation that was created to provide cost-effective property insurance coverage for Atmos Energy and its subsidiaries. It was chartered in Bermuda effective December 16, 2003, and became operational as of January 1, 2004. It is incorporated under Bermuda's insurance law and regulations and is fully capitalized under the requirements of applicable Bermuda law.

Atmos Energy Services, LLC was established on April 1, 2004 to provide natural gas management services to Atmos Energy's natural gas distribution operations, other than the Mid-Tex Division. These services include aggregating and purchasing gas supply, arranging transportation and storage logistics and ultimately delivering the gas to Atmos Energy's natural gas distribution service areas at competitive prices. AES provided these services through December 31, 2006. Effective January 1, 2007, the gas supply department within shared services began providing these services. However, AES continues to provide limited services to the natural gas distribution operations of Atmos Energy.

Phoenix Gas Gathering Company is a wholly owned subsidiary of Atmos Gathering Company, LLC, and was created to develop, own and operate a non-regulated natural gas gathering system located in Kentucky.

Atmos Gathering Company, LLC is a wholly owned subsidiary of Atmos Pipeline and Storage, LLC and was created to conduct our non-regulated natural gas gathering operations.

Atmos Energy Holdings, Inc. is the parent company of Atmos Energy Corporation's non-utility operations.

Atmos Energy Louisiana Industrial Gas, LLC serves industrial customers in Louisiana who use gas for fuel, manufacturing and other processes.

Atmos Exploration and Production, Inc. holds some insignificant Kentucky production interests which the Company succeeded to when it acquired Western Kentucky Gas Company in 1989. This subsidiary is functionally inactive as the Company does not actively engage in the exploration and production business.

Atmos Pipeline and Storage, LLC owns or has an interest in underground storage fields in Kentucky and Louisiana. The utility divisions of Atmos Energy also use these

storage facilities to reduce the need to contract for additional pipeline capacity to meet customer demand during peak periods.

Atmos Power Systems, Inc. constructs gas-fired electric peaking power generating plant and associated facilities and may enter into agreements to either lease or sell these plants. Since 2001, 2 sales-type lease transactions have been executed.

Egasco, LLC was, several years ago, engaged in the marketing and sale of natural gas to large-volume commercial and agricultural customers in West Texas. Egasco no longer serves any customers.

Fort Necessity Gas Storage, LLC is a wholly owned subsidiary of Atmos Pipeline and Storage, LLC, and was created in 2009 to construct and operate a non-regulated salt-cavern gas storage project in Louisiana. In March 2011, we recorded a \$19.3 million charge to substantially write off our investment in Fort Necessity.

Trans Louisiana Gas Storage, Inc. owns a minority interest in a salt dome storage facility in Louisiana. This facility is used to serve utility and non-utility customers.

Trans Louisiana Gas Pipeline, Inc. owns and operates an intrastate pipeline system in Louisiana. This facility is used to serve utility and non-utility customers.

UCG Storage, Inc. owns certain storage field interests in Kentucky which are used to serve utility customers.

WKG Storage, Inc. owns certain storage field interests in Kentucky which are used to serve utility customers.

Service: Capitalized overhead (general)

Description: Overhead related to capital expenditures

Current Provider of Service: Shared Services
 Atmos Pipeline – Texas Division
 Louisiana Division operating division general office
 Kentucky/Mid-States Division operating division general office
 Colorado-Kansas Division operating division general office
 Mid-Tex Division
 Mississippi Division
 West Texas Division operating division general office

Current Use of Service: Rate divisions

Basis for allocation: Capitalized overhead costs are accumulated by operating division (and state level for multiple state divisions). Each operating division (and state) sets an application rate at the beginning of the year based on projected expenditures. As expenditures for CWIP and RWIP are recorded overhead is applied at the application rate. Periodically, the application rate is reviewed. Shared services overhead is allocated to operating divisions based on operating division capital expenditures. At the end of each quarter, the amount that has accumulated in the OH project is cleared to all eligible projects that incurred charges during that quarter, on a pro rata basis

General Ledger Entries: Example Only

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* Cap rate = 20%
 ** Many rate division offices exist within Mid-States in addition to Div 009.

- Flow of Activity**
- (1) Purchase Office Supplies
 - (2) Capitalize Overhead is calculated based on cost center capitalization percentage
 - (3) Allocating Shared Services Expenses to General Offices - 60% Allocation rate for illustration purposes only
 - (3a) Allocation to remaining general offices
 - (3b) Allocate capitalization credits to business units
 - (4) Allocating Shared Services Expenses to Rate Division Office - 25% Allocation rate for illustration purposes only
 - (4a) Allocation to remaining division offices
 - (5) Allocating Shared Services Capitalization Credit to Rate Division Office - 50% Allocation rate for illustration purposes only

Note: Please see the allocation of expenses from General Office to State Regional Office to Rate Division on the following pages:
 West Texas - 17, Colorado/Kansas - 19, Louisiana - 23

Service: Stores overhead

Description: Overhead related to inventory warehousing is allocated to materials as issued.

Current Provider of Service: Shared Services
Operating division general office

Current Use of Service: Atmos Pipeline – Texas Division
West Texas Division rate divisions
Louisiana Division rate divisions
Kentucky/Mid-States Division rate divisions
Mid-Tex Division rate division
Colorado-Kansas Division rate divisions
Mississippi Division rate division

Basis for allocation: Overhead costs associated with inventory items, including rent, labor and supervision are accumulated by operating division. Each operating division sets an application rate at the beginning of the year based on projected overhead and materials activity. As materials are issued from the warehouse, the overhead assigned is also allocated to the same account. Periodically, the balance in the undistributed stores overhead account is compared to the materials on hand balance and a new rate is determined. Shared Services stores overhead is allocated monthly to the operating divisions based on number of meters.

General Ledger Entries: Example Only

<table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Cash</td></tr> <tr><td style="text-align: center;">Acct. 131</td></tr> <tr><td style="border-top: 1px solid black;">\$100 (1) \$2 (3a)</td></tr> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Stores Expense</td></tr> <tr><td style="text-align: center;">Undistributed</td></tr> <tr><td style="text-align: center;">Acct. 163</td></tr> <tr><td style="border-top: 1px solid black;">(3a) \$2 \$2 (3b)</td></tr> </table>	SSU BU 010	Cash	Acct. 131	\$100 (1) \$2 (3a)	SSU BU 010	Stores Expense	Undistributed	Acct. 163	(3a) \$2 \$2 (3b)	<table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Inventory</td></tr> <tr><td style="border-top: 1px solid black;">(1) \$100 \$100 (2)</td></tr> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Accounts Payable</td></tr> <tr><td style="text-align: center;">Acct. 232</td></tr> <tr><td style="border-top: 1px solid black;">(3a) \$2 \$2 (3a)</td></tr> </table>	SSU BU 010	Inventory	(1) \$100 \$100 (2)	SSU BU 010	Accounts Payable	Acct. 232	(3a) \$2 \$2 (3a)	<table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <tr><td style="text-align: center;">Rate Div Office</td></tr> <tr><td style="text-align: center;">Mid States Div 009 **</td></tr> <tr><td style="text-align: center;">Construction Work</td></tr> <tr><td style="text-align: center;">in Progress</td></tr> <tr><td style="text-align: center;">Acct. 107</td></tr> <tr><td style="border-top: 1px solid black;">(2) \$100 (3b) \$2</td></tr> </table>	Rate Div Office	Mid States Div 009 **	Construction Work	in Progress	Acct. 107	(2) \$100 (3b) \$2
SSU BU 010																								
Cash																								
Acct. 131																								
\$100 (1) \$2 (3a)																								
SSU BU 010																								
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(3a) \$2 \$2 (3a)																								
Rate Div Office																								
Mid States Div 009 **																								
Construction Work																								
in Progress																								
Acct. 107																								
(2) \$100 (3b) \$2																								

** Many rate division offices exist within Mid-States in addition to Div 009.

Flow of Activity

- 1 Purchase Inventory - Material
 - 2 Issue Inventory to Capital Project
 - 3a Incurring Inventory Expense
 - 3b Apply Inventory Storage Rate
- Assume 2%

Service: O&M Expenses in Shared Services – Customer Support cost centers

Description: Includes all expenses for Customer Support. (Division 012)

Current Provider Of Service Shared Services

Current Use of Service
 West Texas Rate Divisions
 Mid-Tex Division
 Louisiana Rate Divisions
 Kentucky/Mid-States Rate Divisions
 Colorado-Kansas Rate Divisions
 Mississippi Division

Basis for allocation Costs are allocated to the applicable operating division general office in total based on the average number of customers in each operating division as a percentage of the total number of customers in all of the operating divisions. From the operating division general office Divisions Customer Support charges are allocated to rate divisions using the average number of customers in each rate division.

General Ledger Entries: Example Only

<table border="1" style="margin: auto;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Cash</td></tr> <tr><td style="text-align: center;">Acct. 131</td></tr> <tr><td style="border-top: 1px solid black;">\$1,000 (1)</td></tr> </table>	SSU BU 010	Cash	Acct. 131	\$1,000 (1)	<table border="1" style="margin: auto;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Accounts Payable</td></tr> <tr><td style="text-align: center;">Acct. 232</td></tr> <tr><td style="border-top: 1px solid black;">(1) \$1,000</td></tr> <tr><td style="border-bottom: 1px solid black;">\$1,000 (1)</td></tr> </table>	SSU BU 010	Accounts Payable	Acct. 232	(1) \$1,000	\$1,000 (1)	<table border="1" style="margin: auto;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Office Supply and Expenses *</td></tr> <tr><td style="text-align: center;">Acct. 921</td></tr> <tr><td style="text-align: center;">Cost Center XXXX</td></tr> <tr><td style="border-top: 1px solid black;">(1) \$1,000</td></tr> </table>	SSU BU 010	Office Supply and Expenses *	Acct. 921	Cost Center XXXX	(1) \$1,000	<table border="1" style="margin: auto;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Administrative Expenses Transferred</td></tr> <tr><td style="text-align: center;">Acct. 922</td></tr> <tr><td style="border-top: 1px solid black;">\$ 400 (2)</td></tr> <tr><td style="border-bottom: 1px solid black;">\$ 600 (2a)</td></tr> </table>	SSU BU 010	Administrative Expenses Transferred	Acct. 922	\$ 400 (2)	\$ 600 (2a)
SSU BU 010																						
Cash																						
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<table border="1" style="margin: auto;"> <tr><td style="text-align: center;">General Office Remaining</td></tr> <tr><td style="text-align: center;">Administrative Expenses Transferred</td></tr> <tr><td style="text-align: center;">Acct. 922</td></tr> <tr><td style="border-top: 1px solid black;">(2a) \$ 600</td></tr> </table>	General Office Remaining	Administrative Expenses Transferred	Acct. 922	(2a) \$ 600	<table border="1" style="margin: auto;"> <tr><td style="text-align: center;">General Office Mid States - Div 091</td></tr> <tr><td style="text-align: center;">Administrative Expenses Transferred</td></tr> <tr><td style="text-align: center;">Acct. 922</td></tr> <tr><td style="border-top: 1px solid black;">(2) \$400</td></tr> <tr><td style="border-bottom: 1px solid black;">\$100 (3)</td></tr> <tr><td style="border-bottom: 1px solid black;">\$300 (3a)</td></tr> </table>	General Office Mid States - Div 091	Administrative Expenses Transferred	Acct. 922	(2) \$400	\$100 (3)	\$300 (3a)	<table border="1" style="margin: auto;"> <tr><td style="text-align: center;">Rate Div Office Mid States Div 009 **</td></tr> <tr><td style="text-align: center;">Administrative Expenses Transferred</td></tr> <tr><td style="text-align: center;">Acct. 922</td></tr> <tr><td style="border-top: 1px solid black;">(3) \$100</td></tr> </table>	Rate Div Office Mid States Div 009 **	Administrative Expenses Transferred	Acct. 922	(3) \$100	<table border="1" style="margin: auto;"> <tr><td style="text-align: center;">Rate Div Office Mid States -Remaining</td></tr> <tr><td style="text-align: center;">Administrative Expenses Transferred</td></tr> <tr><td style="text-align: center;">Acct. 922</td></tr> <tr><td style="border-top: 1px solid black;">(3a) \$300</td></tr> </table>	Rate Div Office Mid States -Remaining	Administrative Expenses Transferred	Acct. 922	(3a) \$300	
General Office Remaining																						
Administrative Expenses Transferred																						
Acct. 922																						
(2a) \$ 600																						
General Office Mid States - Div 091																						
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Acct. 922																						
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Rate Div Office Mid States -Remaining																						
Administrative Expenses Transferred																						
Acct. 922																						
(3a) \$300																						

* Many O&M expense accounts exist in addition to 921 that get cleared out of account 922.

** Many rate division offices exist within Mid-States in addition to Div 009.

Flow of Activity

- (1) Purchase Office Supplies - Shared Services
- (2) Allocating Shared Services Expenses to General Offices - 40% Allocation rate for illustration purposes only
- (2a) Allocation to remaining general offices
- (3) Allocating Shared Services Expenses to Rate Division Office - 25% Allocation rate for illustration purposes only
- (3a) Allocation to remaining division offices

Note: Please see the allocation of expenses from General Office to State Regional Office to Rate Division on the following pages:
 West Texas - 17, Colorado/Kansas - 19, Louisiana - 23

Service: O&M Expenses in Shared Services – General Office cost centers

Description: Includes O&M expenses in Shared Services – General Office. (Division 002)

Current Provider Of Service Shared Services

Current Use of Service Atmos Energy Louisiana Industrial Gas, LLC
Trans Louisiana Gas Pipeline
WKG Storage, Inc.
West Texas Division
Mid-Tex Division
Atmos Pipeline – Texas Division
Louisiana Division
Kentucky/Mid-States Division
Colorado-Kansas Division
Mississippi Division
Trans Louisiana Gas Storage
Atmos Power Systems, Inc
UCG Storage, Inc.
Atmos Energy Holdings, Inc.

Basis for allocation Costs are allocated to affiliates and operating divisions based on a composite factor applied to the Shared Services departments. Shared Services departments which provide services to the Company's affiliates utilize a composite factor which includes the affiliates.

Shared Service departments that do not provide services to the Company's affiliates utilize a composite factor which does not include the Company's affiliates.

Other allocation methods used as appropriate include, but are not limited to, composite not including affiliates or Atmos Pipeline –Texas and an Overhead rate.

From each operating division general office charges are allocated to rate divisions using the composite rate for each rate division.

See page 12 for General Ledger Entries: Example Only.

General Ledger Entries: Example Only

<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Cash</td></tr> <tr><td style="text-align: center;">Acct. 131</td></tr> <tr><td style="border-top: 1px solid black; border-left: 1px solid black; border-right: 1px solid black;">\$1,000 (1)</td></tr> </table>	SSU BU 010	Cash	Acct. 131	\$1,000 (1)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Accounts Payable</td></tr> <tr><td style="text-align: center;">Acct. 232</td></tr> <tr><td style="border-top: 1px solid black; border-left: 1px solid black; border-right: 1px solid black;">\$1,000 (1) \$1,000 (1)</td></tr> </table>	SSU BU 010	Accounts Payable	Acct. 232	\$1,000 (1) \$1,000 (1)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Office Supply and Expenses *</td></tr> <tr><td style="text-align: center;">Acct. 921</td></tr> <tr><td style="text-align: center;">Cost Center XXXX</td></tr> <tr><td style="border-top: 1px solid black; border-left: 1px solid black; border-right: 1px solid black;">\$1,000 (1)</td></tr> </table>	SSU BU 010	Office Supply and Expenses *	Acct. 921	Cost Center XXXX	\$1,000 (1)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Administrative Expenses Transferred</td></tr> <tr><td style="text-align: center;">Acct. 922</td></tr> <tr><td style="border-top: 1px solid black; border-left: 1px solid black; border-right: 1px solid black;">\$ 300 (2) \$ 700 (2a)</td></tr> </table>	SSU BU 010	Administrative Expenses Transferred	Acct. 922	\$ 300 (2) \$ 700 (2a)
SSU BU 010																				
Cash																				
Acct. 131																				
\$1,000 (1)																				
SSU BU 010																				
Accounts Payable																				
Acct. 232																				
\$1,000 (1) \$1,000 (1)																				
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Office Supply and Expenses *																				
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\$1,000 (1)																				
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\$ 300 (2) \$ 700 (2a)																				
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">General Office Remaining</td></tr> <tr><td style="text-align: center;">Administrative Expenses Transferred</td></tr> <tr><td style="text-align: center;">Acct. 922</td></tr> <tr><td style="border-top: 1px solid black; border-left: 1px solid black; border-right: 1px solid black;">(2a) \$ 700</td></tr> </table>	General Office Remaining	Administrative Expenses Transferred	Acct. 922	(2a) \$ 700	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">General Office Mid States - Div 091</td></tr> <tr><td style="text-align: center;">Administrative Expenses Transferred</td></tr> <tr><td style="text-align: center;">Acct. 922</td></tr> <tr><td style="border-top: 1px solid black; border-left: 1px solid black; border-right: 1px solid black;">(2) \$300 (3) \$150 (3) \$150 (3a)</td></tr> </table>	General Office Mid States - Div 091	Administrative Expenses Transferred	Acct. 922	(2) \$300 (3) \$150 (3) \$150 (3a)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">Rate Div Office Mid States Div 009 **</td></tr> <tr><td style="text-align: center;">Administrative Expenses Transferred</td></tr> <tr><td style="text-align: center;">Acct. 922</td></tr> <tr><td style="border-top: 1px solid black; border-left: 1px solid black; border-right: 1px solid black;">(3) \$150</td></tr> </table>	Rate Div Office Mid States Div 009 **	Administrative Expenses Transferred	Acct. 922	(3) \$150	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">Rate Div Office Mid States -Remaining</td></tr> <tr><td style="text-align: center;">Administrative Expenses Transferred</td></tr> <tr><td style="text-align: center;">Acct. 922</td></tr> <tr><td style="border-top: 1px solid black; border-left: 1px solid black; border-right: 1px solid black;">(3a) \$150</td></tr> </table>	Rate Div Office Mid States -Remaining	Administrative Expenses Transferred	Acct. 922	(3a) \$150	
General Office Remaining																				
Administrative Expenses Transferred																				
Acct. 922																				
(2a) \$ 700																				
General Office Mid States - Div 091																				
Administrative Expenses Transferred																				
Acct. 922																				
(2) \$300 (3) \$150 (3) \$150 (3a)																				
Rate Div Office Mid States Div 009 **																				
Administrative Expenses Transferred																				
Acct. 922																				
(3) \$150																				
Rate Div Office Mid States -Remaining																				
Administrative Expenses Transferred																				
Acct. 922																				
(3a) \$150																				

* Many O&M expense accounts exist in addition to 921 that get cleared out of account 922.

** Many rate division offices exist within Mid-States in addition to Div 009.

Flow of Activity

- ✓ (1) Purchase Office Supplies - Shared Services
- ✓ (2) Allocating Shared Services Expenses to General Offices - 30% Allocation rate for illustration purposes only
 - (2a) Allocation to remaining general offices
- ✓ (3) Allocating Shared Services Expenses to Rate Division Office - 50% Allocation rate for illustration purposes only
 - (3a) Allocation to remaining division offices

Note: Operating Divisions Mississippi, Mid-Tex and Atmos Pipeline – Texas have 1 rate division. There is no allocation to remaining division offices (3a).

Note: Please see the allocation of expenses from General Office to State Regional Office to Rate Division on the following pages:
West Texas - 17, Colorado/Kansas - 19, Louisiana - 23

Service: SSU – Customer Support taxes other than income taxes

Description: Includes all taxes other than income tax charged in Shared Services – Customer Support.

Current Provider Of Services: Shared Services

Current Use of Service: West Texas Rate Divisions
Louisiana Rate Divisions
Kentucky/Mid-States Rate Divisions
Mid-Tex Division
Colorado-Kansas Rate Divisions
Mississippi Division

Basis for allocation: Costs are allocated to the applicable rate division level in total based on the average number of customers in each operating division as a percentage of the total number of customers in all of the operating divisions.
If needed number of customers in the rate divisions is used to allocate from the operating division general office to the rate divisions.

General Ledger Entries: Example Only

<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">SSU BU 010</td></tr> <tr><td style="padding: 2px;">Cash</td></tr> <tr><td style="padding: 2px;">Acct. 131</td></tr> <tr><td style="padding: 2px; border-top: 1px solid black;">\$1,000 (1)</td></tr> </table>	SSU BU 010	Cash	Acct. 131	\$1,000 (1)	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">SSU BU 010</td></tr> <tr><td style="padding: 2px;">Accounts Payable</td></tr> <tr><td style="padding: 2px;">Acct. 232</td></tr> <tr><td style="padding: 2px; border-top: 1px solid black;">\$1,000</td></tr> <tr><td style="padding: 2px;">\$1,000 (1)</td></tr> </table>	SSU BU 010	Accounts Payable	Acct. 232	\$1,000	\$1,000 (1)	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">SSU BU 010</td></tr> <tr><td style="padding: 2px;">Taxes Other than Income Taxes</td></tr> <tr><td style="padding: 2px;">Acct. 408.1</td></tr> <tr><td style="padding: 2px; border-top: 1px solid black;">\$1,000</td></tr> <tr><td style="padding: 2px;">\$400 (2)</td></tr> <tr><td style="padding: 2px;">\$600 (2a)</td></tr> </table>	SSU BU 010	Taxes Other than Income Taxes	Acct. 408.1	\$1,000	\$400 (2)	\$600 (2a)	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">General Office Remaining</td></tr> <tr><td style="padding: 2px;">Taxes Other than Income Taxes</td></tr> <tr><td style="padding: 2px;">Acct. 408.1</td></tr> <tr><td style="padding: 2px; border-top: 1px solid black;">\$600</td></tr> </table>	General Office Remaining	Taxes Other than Income Taxes	Acct. 408.1	\$600
SSU BU 010																						
Cash																						
Acct. 131																						
\$1,000 (1)																						
SSU BU 010																						
Accounts Payable																						
Acct. 232																						
\$1,000																						
\$1,000 (1)																						
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<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">General Office Mid States -Div 091</td></tr> <tr><td style="padding: 2px;">Taxes Other than Income Taxes</td></tr> <tr><td style="padding: 2px;">Acct. 408.1</td></tr> <tr><td style="padding: 2px; border-top: 1px solid black;">\$400</td></tr> <tr><td style="padding: 2px;">\$100 (3)</td></tr> <tr><td style="padding: 2px;">\$300 (3a)</td></tr> </table>	General Office Mid States -Div 091	Taxes Other than Income Taxes	Acct. 408.1	\$400	\$100 (3)	\$300 (3a)	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">Rate Div Office Mid States -Div 009**</td></tr> <tr><td style="padding: 2px;">Taxes Other than Income Taxes</td></tr> <tr><td style="padding: 2px;">Acct. 408.1</td></tr> <tr><td style="padding: 2px; border-top: 1px solid black;">\$100</td></tr> </table>	Rate Div Office Mid States -Div 009**	Taxes Other than Income Taxes	Acct. 408.1	\$100	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">Rate Div Office Mid States - Remaining</td></tr> <tr><td style="padding: 2px;">Taxes Other than Income Taxes</td></tr> <tr><td style="padding: 2px;">Acct. 408.1</td></tr> <tr><td style="padding: 2px; border-top: 1px solid black;">\$300</td></tr> </table>	Rate Div Office Mid States - Remaining	Taxes Other than Income Taxes	Acct. 408.1	\$300						
General Office Mid States -Div 091																						
Taxes Other than Income Taxes																						
Acct. 408.1																						
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Rate Div Office Mid States - Remaining																						
Taxes Other than Income Taxes																						
Acct. 408.1																						
\$300																						

** Many rate division offices exist in addition to Div 009.

Flow of Activity

- (1) Taxes Other than Income Taxes incurred
- (2) Allocating Shared Services Expenses to General Offices - 40% to Mid States BU - for illustration purposes
- (2a) Allocating to remaining division offices
- (3) Allocating Shared Services Expenses to Rate Division Office - 25% for Kentucky Rate Division Office - for illustration purposes only
- (3a) Allocating Shared Services Expenses to remaining Rate Division Offices

Note: Please see the allocation of expenses from General Office to State Regional Office to Rate Division on the following pages:
West Texas - 17, Colorado/Kansas - 19, Louisiana - 23

Service: **SSU – General Office taxes other than income taxes**

Description: Includes all taxes other than income tax charged in Shared Services – General Office.

Current Provider Of Services Shared Services

Current Use of Service Atmos Energy Louisiana Industrial Gas, LLC
Atmos Power Systems, Inc.
WKG Storage, Inc.
Trans Louisiana Gas Pipeline, Inc.
West Texas Division
Mid-Tex Division
Atmos Pipeline – Texas Division
Louisiana Division
Kentucky/Mid-States Division
Colorado-Kansas Division
Mississippi Division
UCG Storage, Inc.
Atmos Energy Holdings, Inc.

Basis for allocation Costs are allocated to the applicable operating divisions in total based on the Composite Factor. The Composite Factor is the simple average of three percentages:

The percentage of Gross Direct Property Plant and Equipment in each operating division unit as a percentage of the total Direct Property Plant and Equipment in all of the operating divisions.

The number of customers in each operating division as a percentage of the total number of customers in all of the operating divisions.

The total direct O&M expense in each operating division as a percentage of the total direct O&M expense in all operating divisions.

If needed, allocation from operating division general offices to rate division uses the composite rate.

See page 13 for General Ledger Entry – Example Only.

Service: SSU – Customer Support depreciation

Description: Includes all depreciation charged in Shared Services – Customer Support.

Current Provider Of Services Shared Services

Current Use of Service West Texas Rate Divisions
Louisiana Rate Divisions
Kentucky/Mid-States Rate Divisions
Mid-Tex Division
Colorado-Kansas Rate Divisions
Mississippi Division

Basis for allocation Costs are generally allocated to the applicable rate division level in total based on the average number of customers in each operating division as a percentage of the total number of customers in all of the operating divisions.
If needed, number of customers in the rate divisions is used to allocate from the operating division general office to the rate divisions.
Depreciation associated with the Charles K. Vaughan Center is allocated based upon square footage, number of customers and employee training usage.

General Ledger Entries: Example Only

SSU BU 010		SSU BU 010		Rate Div Office Mid States -Div 009**	
Depreciation Exp Acct. 403		Depreciation Exp Acct. 108		Depreciation Exp Acct. 403	
(1)	\$5,000		\$5,000 (1)	(2)	\$200
	\$200 (2)			(2a)	\$4,800
	\$4,800 (2a)				

** Many rate division offices exist in addition to Div 009.

Flow of Activity

- ✓ (1) Monthly Depreciation Expense is booked through Powerplant and interfaces with the Oracle general ledger.
- ✓ (2) Current Month Depreciation Expense is allocated to the various utility rate divisions using the following allocation factors:
 - i. For SSU division 002 - General - Allocated using the composite factor
 - ii. For SSU division 012 - Call Center - Allocated using the customer factor.
- (2a) Allocation to remaining Rate Divisions

Note: Please see the allocation of expenses from General Office to State Regional Office to Rate Division on the following pages:
West Texas - 17, Colorado/Kansas - 19, Louisiana - 23

Service: SSU – General Office depreciation

Description: Includes all depreciation charged in Shared Services – General Office.

Current Provider Of Services Shared Services

Current Use of Service Atmos Energy Louisiana Industrial Gas, LLC
WKG Storage, Inc.
Trans Louisiana Gas Pipeline, Inc.
West Texas Division
Mid-Tex Division
Atmos Pipeline – Texas Division
Louisiana Division
Kentucky/Mid-States Division
Colorado-Kansas Division
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UCG Storage, Inc.
Atmos Energy Holdings, Inc.

Basis for allocation Costs are generally allocated to the applicable operating divisions in total based on the Composite Factor. The Composite Factor is the simple average of three percentages:

- (1) The percentage of Gross Direct Property Plant and Equipment in each operating division unit as a percentage of the total Direct Property Plant and Equipment in all of the operating divisions.
- (2) The number of customers in each operating division as a percentage of the total number of customers in all of the operating divisions.
- (3) The total direct O&M expense in each operating division as a percentage of the total direct O&M expense in all operating divisions.

If needed, allocation from operating division general offices to rate division uses the composite rate.

The depreciation allocation for the Greenville Data Center is based upon the Composite Factor and square footage percent by business unit.

The depreciation allocation for SSU General Office (Div 002) assets that support the enterprise excluding our Atmos Pipeline – Texas (APT) Division are based on a composite factor that excludes APT. This rate is referred to as AEAM.

The depreciation allocation for our Align billing system assets are based upon invoiced volumes per business unit as a percentage of total volumes. Currently, only the APT, Mid-Tex and AELIG business units use this rate.

See page 15 for General Ledger Entry – Example Only.

Service: **West Texas Division operating division general office O&M, depreciation and taxes other than income taxes, to rate division level**

Description: Allocation of operating division general office expenses to rate division levels

Current Provider of Service West Texas Division operating division general office

Current Use of Service West Texas Division rate divisions

Basis for allocation Costs are allocated to the applicable operating divisions in total based on the Composite Factor. The Composite Factor is the simple average of three percentages:

- (1) The percentage of Gross Direct Property Plant and Equipment in each division as a percentage of the total Direct Property Plant and Equipment in the West Texas Division rate divisions.
- (2) The number of customers in each rate division as a percentage of the total number of customers in the West Texas Division rate divisions.
- (3) The total direct O&M expense in each municipal rate division as a percentage of the total direct O&M expense in the West Texas Division rate divisions.

See Page 18 for General Ledger Entries: Example Only.

General Ledger Entries: Example Only

General Office SSU - Div 002	
Cash	
Acct. 131	
	\$500 (1)
	\$400 (5)

General Office SSU - Div 002	
Accounts Payable	
Acct. 232	
(1) \$500	\$500 (1)
(5) \$400	\$400 (5)

General Office West Texas - Div 010	
Office Supply and Expenses *	
Acct. 921	
(1) \$500	

General Office West Texas - Div 010	
Administrative Expenses Transferred	
Acct. 922	
	\$200 (2)
	\$300 (2a)

Rate Div Office West Texas Div 005**	
Administrative Expenses Transferred	
Acct. 922	
(2) \$200	

Rate Div Office West Texas -Remaining	
Administrative Expenses Transferred	
Acct. 922	
(2a) \$300	

General Office West Texas - Div 010	
Depreciation Exp	
Acct. 403	
(3) \$100	\$15 (4)
	\$85 (4a)

West Texas - Div 010	
Accumulated Depreciation	
Acct. 108	
	\$100 (3)

Rate Div Office West Texas Div 005**	
Depreciation Exp	
Acct. 403	
(4) \$15	

General Office West Texas - Div 010	
Taxes Other than Income Taxes	
Acct. 408.1	
(5) \$400	\$100 (6)
	\$300 (6a)

Rate Div Office West Texas Div 005**	
Taxes Other than Income Taxes	
Acct. 408.1	
(6) \$ 100	

Rate Div Office West Texas -Remaining	
Taxes Other and Depreciation	
Acct. 408.1 and 403	
(4a) \$85	
(6a) \$300	

* Many O&M expense accounts exist in addition to 921 that get cleared out of account 922.

** Many rate division offices exist in addition to Div 005.

Flow of Activity

- ✓ (1) Purchase Office Supplies - West Texas Division General Office
- ✓ (2) Allocating General Office Expenses to Rate Division Office - 40% Allocation rate for illustration purposes only
 - (2a) Allocation to remaining division offices
- ✓ (3) Monthly Depreciation Expense is booked through Powerplant and interfaces with the Oracle general ledger.
- ✓ (4) Allocation from Division 010 - West Texas General Office to West Texas Rate Divisions
 - (4a) Allocation to remaining division offices
- ✓ (5) Taxes Other than Income Taxes incurred
- ✓ (6) Allocating General Office Expenses to Rate Division Office - 25% to West Texas Rate Division Office - for illustration purposes only
 - (6a) Allocation to remaining division offices

Service: Colorado-Kansas Division operating division general office expenses to state regional office division level.

Description: Allocation of division general office expenses to state regional office division levels.

Current Provider of Service: Colorado-Kansas Division operating division general office

Current Use of Service: Colorado-Kansas Operating Division state office divisions.

Basis for allocation: Costs are allocated to the applicable state regional office divisions in total based on the Composite Factor. The Composite Factor is the simple average of three percentages:

- (1) The percentage of Gross Direct Property Plant and Equipment in each state as a percentage of the total Direct Property Plant and Equipment in Colorado-Kansas Division.
- (2) The number of customers in each state as a percentage of the total number of customers in Colorado-Kansas Division.
- (3) The total direct O&M expense in each state as a percentage of the total direct O&M expense in Colorado-Kansas Division.

General Ledger Entries: Example Only

<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 5px;">General Office SSU – Div 002</td></tr> <tr><td style="padding: 5px;">Cash Acct. 131</td></tr> <tr><td style="border-top: 1px solid black; padding: 5px;">\$500(1)</td></tr> </table>	General Office SSU – Div 002	Cash Acct. 131	\$500(1)	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 5px;">General Office SSU – Div 002</td></tr> <tr><td style="padding: 5px;">Accounts Payable Acct. 232</td></tr> <tr><td style="border-top: 1px solid black; padding: 5px;">(1) \$500 \$500(1)</td></tr> </table>	General Office SSU – Div 002	Accounts Payable Acct. 232	(1) \$500 \$500(1)	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 5px;">General Office CO/KS BU 060</td></tr> <tr><td style="padding: 5px;">Office Supply and Expenses * Acct. 921</td></tr> <tr><td style="border-top: 1px solid black; padding: 5px;">(1) \$500</td></tr> </table>	General Office CO/KS BU 060	Office Supply and Expenses * Acct. 921	(1) \$500
General Office SSU – Div 002											
Cash Acct. 131											
\$500(1)											
General Office SSU – Div 002											
Accounts Payable Acct. 232											
(1) \$500 \$500(1)											
General Office CO/KS BU 060											
Office Supply and Expenses * Acct. 921											
(1) \$500											
<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 5px;">General Office CO/KS BU 060</td></tr> <tr><td style="padding: 5px;">Administrative Expenses Transferred Acct. 922</td></tr> <tr><td style="border-top: 1px solid black; padding: 5px;">\$250(2) \$250 (2a)</td></tr> </table>	General Office CO/KS BU 060	Administrative Expenses Transferred Acct. 922	\$250(2) \$250 (2a)	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 5px;">State Div Office CO/KS Div 031</td></tr> <tr><td style="padding: 5px;">Administrative Expenses Transferred Acct. 922</td></tr> <tr><td style="border-top: 1px solid black; padding: 5px;">(2) \$250</td></tr> </table>	State Div Office CO/KS Div 031	Administrative Expenses Transferred Acct. 922	(2) \$250	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 5px;">Rate Div Office CO/KS Div 080</td></tr> <tr><td style="padding: 5px;">Administrative Expenses Transferred Acct. 922</td></tr> <tr><td style="border-top: 1px solid black; padding: 5px;">(2a) \$250</td></tr> </table>	Rate Div Office CO/KS Div 080	Administrative Expenses Transferred Acct. 922	(2a) \$250
General Office CO/KS BU 060											
Administrative Expenses Transferred Acct. 922											
\$250(2) \$250 (2a)											
State Div Office CO/KS Div 031											
Administrative Expenses Transferred Acct. 922											
(2) \$250											
Rate Div Office CO/KS Div 080											
Administrative Expenses Transferred Acct. 922											
(2a) \$250											

* Many O&M expense accounts exist in addition to 921 that get cleared out of account 922.

Flow of Activity

- ✓ (1) Purchase Office Supplies - Colorado/Kansas Division General Office
- ✓ (2) Allocating General Office Expenses to State Division Office - 50% Allocation rate for illustration purposes only
- (2a) Allocation to remaining state office

Service: Colorado-Kansas Division state regional office division level expenses to rate division level

Description: Allocation of state regional office division level expenses to rate division levels.

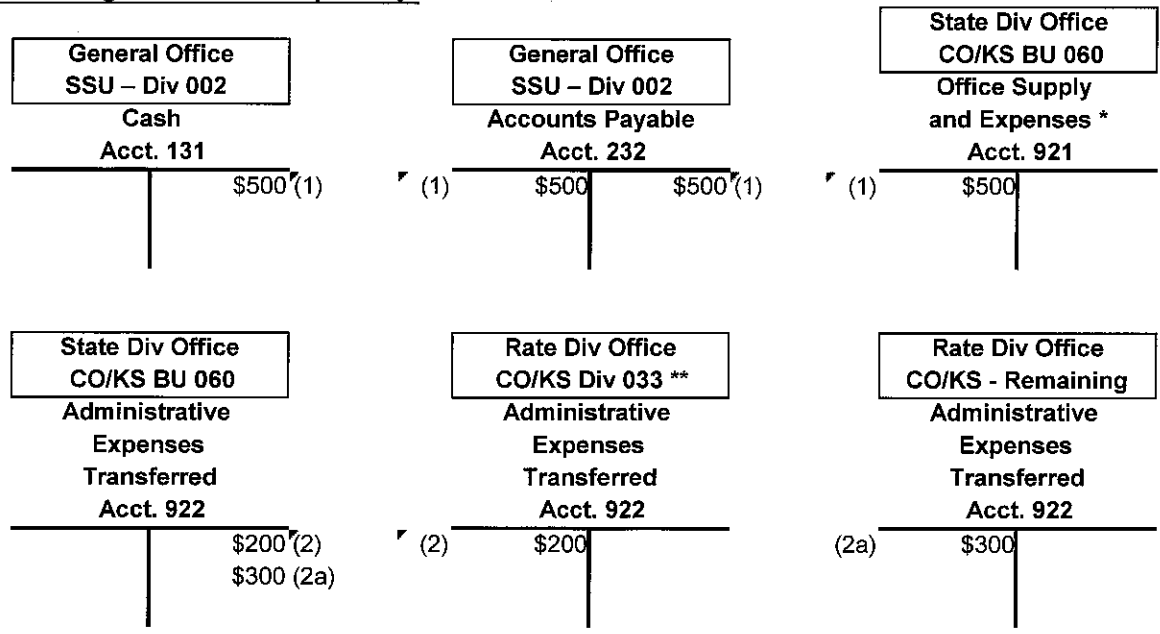
Current Provider of Service: Colorado-Kansas Division regional division office

Current Use of Service: Colorado-Kansas Division rate divisions

Basis for allocation: Costs are allocated to the applicable rate divisions in total based on the Composite Factor. The Composite Factor is the simple average of three percentages:

- (1) The percentage of Gross Direct Property Plant and Equipment in each state rate division as a percentage of the total Direct Property Plant and Equipment in each state.
- (2) The number of customers in each state rate division as a percentage of the total number of customers in each state.
- (3) The total direct O&M expense in each state rate division as a percentage of the total direct O&M expense in each state.

General Ledger Entries: Example Only



* Many O&M expense accounts exist in addition to 921 that get cleared out of account 922.

** Many rate division offices exist within the state in addition to Div 033.

Flow of Activity

- ✓ (1) Purchase Office Supplies - Colorado/Kansas State Division Office
- ✓ (2) Allocating State Division Office Expenses to Rate Division Office - 40% Allocation rate for illustration purposes only
- (2a) Allocation to remaining division offices

Service:	Kentucky/Mid-States Division operating division general office O&M, depreciation and taxes other than income taxes, to rate division level
Description:	Allocation of operating division general office expenses to rate division levels
Current Provider Of Service	Kentucky/Mid-States Division operating division general office
Current Use of Service	Kentucky/Mid-States Division rate divisions
Basis for allocation	<p>Costs are allocated to the applicable rate divisions in total based on the Composite Factor. The Composite Factor is the simple average of three percentages:</p> <ol style="list-style-type: none"> (1) The percentage of Gross Direct Property Plant and Equipment in each rate division as a percentage of the total Direct Property Plant and Equipment in Kentucky/Mid-States Division. (2) The number of customers in each rate division as a percentage of the total number of customers in Kentucky/Mid-States Division. (3) The total direct O&M expense in each rate division as a percentage of the total direct O&M expense in Kentucky/Mid-States Division.

See Page 22 for General Ledger Entries: Example Only.

General Ledger Entries: Example Only

General Office SSU – Div 002	
Cash	
Acct. 131	
	\$500 (1)
	\$400 (5)

General Office SSU – Div 002	
Accounts Payable	
Acct. 232	
(1) \$500	\$500 (1)
(5) \$400	\$400 (5)

General Office Mid States - Div 091	
Office Supply and Expenses *	
Acct. 921	
(1) \$500	

General Office Mid States - Div 091	
Administrative Expenses Transferred	
Acct. 922	
	\$200 (2)
	\$300 (2a)

Rate Div Office Mid States Div 009 **	
Administrative Expenses Transferred	
Acct. 922	
(2) \$200	

Rate Div Office Mid States -Remaining	
Administrative Expenses Transferred	
Acct. 922	
(2a) \$300	

General Office Mid States - Div 091	
Depreciation Exp	
Acct. 403	
(3) \$100	\$15 (4)
	\$85 (4a)

Mid States - Div 091	
Accumulated Depreciation	
Acct. 108	
	\$100 (3)

Rate Div Office Mid States Div 009 **	
Depreciation Exp	
Acct. 403	
(4) \$15	

General Office Mid States - Div 091	
Taxes Other than Income Taxes	
Acct. 408.1	
(5) \$400	\$100 (6)
	\$300 (6a)

Rate Div Office Mid States Div 009 **	
Taxes Other than Income Taxes	
Acct. 408.1	
(6) \$ 100	

Rate Div Office Mid States -Remaining	
Taxes Other and Depreciation	
Acct. 408.1 and 403	
(4a) \$85	
(6a) \$300	

* Many O&M expense accounts exist in addition to 921 that get cleared out of account 922.

** Many rate division offices exist in addition to Div 009.

Flow of Activity

- ✓ (1) Purchase Office Supplies - Mid States Division General Office
- ✓ (2) Allocating General Office Expenses to Rate Division Office - 40% Allocation rate for illustration purposes only
 - (2a) Allocation to remaining division offices
- ✓ (3) Monthly Depreciation Expense is booked through Powerplant and interfaces with the Oracle general ledger.
- ✓ (4) Allocation from Division 091 - Mid States General Office to Mid States Rate Divisions - Allocated using the composite factor.
 - (4a) Allocation to remaining division offices
- ✓ (5) Taxes Other than Income Taxes incurred
- ✓ (6) Allocating General Office Expenses to Rate Division Office - 25% to Mid States Rate Division Office - for illustration purposes only
 - (6a) Allocation to remaining division offices

Service:	Louisiana Division operating division general office O&M, depreciation and taxes other than income taxes, to rate division level
Description:	Allocation of operating division general office expenses to rate division levels
Current Provider of Service	Louisiana Division operating division general office
Current Use of Service	Louisiana Division rate divisions
Basis for allocation	<p>Costs are allocated to the applicable rate divisions in total based on the Composite Factor. The Composite Factor is the simple average of three percentages:</p> <ol style="list-style-type: none"> (1) The percentage of Gross Direct Property Plant and Equipment in each rate division as a percentage of the total Direct Property Plant and Equipment in Louisiana Division. (2) The number of customers in each rate division as a percentage of the total number of customers in Louisiana Division. (3) The total direct O&M expense in each rate division as a percentage of the total direct O&M expense in Louisiana Division.

See Page 24 for General Ledger Entries: Example Only.

General Ledger Entries: Example Only

General Office SSU – Div 002	
Cash	
Acct. 131	
	\$500 (1)
	\$400 (5)

General Office SSU – Div 002	
Accounts Payable	
Acct. 232	
(1)	\$500
(5)	\$400
	\$500 (1)
	\$400 (5)

General Office LA - Div 107	
Office Supply and Expenses *	
Acct. 921	
(1)	\$500

General Office LA - Div 107	
Administrative Expenses Transferred	
Acct. 922	
	\$200 (2)
	\$300 (2a)

Rate Div Office LA Div 007	
Administrative Expenses Transferred	
Acct. 922	
(2)	\$200

Rate Div Office LA Div 007	
Administrative Expenses Transferred	
Acct. 922	
(2a)	\$300

General Office LA - Div 107	
Depreciation Exp	
Acct. 403	
(3)	\$100
	\$15 (4)
	\$85 (4a)

LA - Div 107	
Accumulated Depreciation	
Acct. 108	
	\$100 (3)

Rate Div Office LA Div 007	
Depreciation Exp	
Acct. 403	
(4)	\$15
(4a)	\$85

General Office LA - Div 107	
Taxes Other than Income Taxes	
Acct. 408.1	
(5)	\$400.00
	\$100 (6)
	\$300 (6a)

Rate Div Office LA Div 007	
Taxes Other than Income Taxes	
Acct. 408.1	
(6)	\$ 100

Rate Div Office LA Div 007	
Taxes Other and Depreciation	
Acct. 408.1 and 403	
(4a)	\$85
(6a)	\$300

* Many O&M expense accounts exist in addition to 921 that get cleared out of account 922.

Flow of Activity

- ✓ (1) Purchase Office Supplies - LA Division General Office
- ✓ (2) Allocating General Office Expenses to Rate Division Office - 40% Allocation rate for illustration purposes only
 - (2a) Allocation to remaining division offices
- ✓ (3) Monthly Depreciation Expense is booked through Powerplant and interfaces with the Oracle general ledger.
- ✓ (4) Allocation from Division 107 - LA General Office to LA Rate Divisions - Allocated using the composite factor.
 - (4a) Allocation to remaining division offices
- ✓ (5) Taxes Other than Income Taxes incurred
- ✓ (6) Allocating General Office Expenses to Rate Division Office - 25% to LA Rate Division Office - for illustration purposes only
 - (6a) Allocation to remaining division offices

Description of Relationship between Mid-Tex and Atmos Pipeline – Texas:

Mid-Tex performs operations and maintenance and capital services for the Atmos Pipeline – Texas (“APT”) Division.

Services are provided on an ongoing basis throughout the Mid-Tex and APT service areas. The field operations include, but are not limited to, services related to pipeline integrity, measurement, compliance work, painting, right of way mowing and reclamation, leak surveys, patrolling, regulator maintenance, fence replacements, line repairs and line replacements. Additionally, Technical and Support Services are provided to APT by centralized departments primarily located at the Mid-Tex headquarters in Dallas. These centralized functions include, but are not limited to, compliance monitoring and reporting, gas measurement, finance and human resources.

APT employs outside contractor labor services and purchases materials and supplies for field operations and construction in addition to the services provided by Mid-Tex. These services and materials are direct charged to APT and are not allocated from Mid-Tex.

APT employs some pipeline only personnel. This labor and the related benefit cost is primarily charged directly to APT and not allocated from Mid-Tex.

Service: Mid-Tex/Atmos Pipeline – Texas Division - Intracompany Labor

Description: Mid-Tex employees’ labor supporting APT operations

Current Provider Of Service Mid-Tex

Current Use of Service Atmos Pipeline – Texas

Basis for allocation The Operational Split is calculated each fiscal year based upon budgeted non-supervisory employee labor and contract labor for the Mid-Tex and APT divisions.

Mid-Tex supervisory and support employees (finance, human resources, etc) who charge time to APT generally use the operational split.

Mid-Tex non-supervisory employees who charge time to APT generally record their time through the time reporting system.

General Ledger Entry: Supervisory employee (Example Only)

SSU – Div 002	
Cash	
Acct. 131	
	\$1,000 (1)

SSU – Div 002	
Accounts Payable	
Acct. 232	
(1) \$1,000	\$1,000 (2)

Mid-Tex BU 080	
O&M Labor	
Acct. 853	
Cost Center 4XXX	
(2) \$200	

Mid-Tex BU 080	
Construction work	
In Progress	
Acct. 107	
Cost Center 4XXX	
(2) \$ 400	

APT BU 180	
Construction work	
In Progress	
Acct. 107	
Cost Center 9XXX	
(2) \$ 250	

APT BU 180	
O&M Labor	
Acct. 853	
Cost Center 9XXX	
(2) \$150	

Flow of Activity:

- (1) Pay Mid-Tex Supervisory employee
- (2) Allocate labor to Mid-Tex and APT – for illustration purposes, this employee's time is charged 60% to Mid-Tex and 40% to APT. The APT portion is 63% capital.

General Ledger Entry: Non Supervisory employee (Example Only)

SSU – Div 002	
Cash	
Acct. 131	
	\$800 (1)

SSU – Div 002	
Accounts Payable	
Acct. 232	
(1) \$800	\$800 (2)

Mid-Tex BU 080	
O&M Labor	
Acct. 853	
Cost Center 4XXX	
(2) \$400	

APT BU 180	
Construction work	
In Progress	
Acct. 107	
Cost Center 9XXX	
(2) \$ 100	

APT BU 180	
O&M Labor	
Acct. 853	
Cost Center 9XXX	
(2) \$300	

Flow of Activity:

- (1) Pay Mid-Tex employee labor
- (2) Direct charge labor to Mid-Tex and APT – for illustration purposes, this employee's time for this payroll cycle was 50% Mid-Tex and 50% APT. The APT portion was 25% capital and 75% expense.

Service: Mid-Tex/Atmos Pipeline – Texas Division - Non Labor Expenses

Description: Allocation includes but is not limited to rents, heavy equipment, utilities, telecom, transportation (vehicles), uniforms, insurance, printing and postage.

Current Provider Of Service: Mid-Tex

Current Use of Service: Atmos Pipeline – Texas Division

Basis for allocation: Factors are primarily based on direct employee labor and contractor labor. The vehicle allocation is based on Company labor only. Allocations vary based on the cost center and sub account.

General Ledger Entries: Transportation Expense (Example Only)

<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">SSU – Div 002</td></tr> <tr><td style="padding: 2px;">Cash</td></tr> <tr><td style="padding: 2px;">Acct. 131</td></tr> <tr style="border-top: 1px solid black;"><td style="padding: 2px;">\$1,000 (1)</td></tr> </table>	SSU – Div 002	Cash	Acct. 131	\$1,000 (1)	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">SSU – Div 002</td></tr> <tr><td style="padding: 2px;">Accounts Payable</td></tr> <tr><td style="padding: 2px;">Acct. 232</td></tr> <tr style="border-top: 1px solid black;"><td style="padding: 2px;">\$1,000 (1)</td></tr> <tr style="border-top: 1px solid black;"><td style="padding: 2px;">\$1,000 (1)</td></tr> </table>	SSU – Div 002	Accounts Payable	Acct. 232	\$1,000 (1)	\$1,000 (1)	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">Mid Tex BU 080</td></tr> <tr><td style="padding: 2px;">O&M Transportation</td></tr> <tr><td style="padding: 2px;">Acct. 853</td></tr> <tr><td style="padding: 2px;">Cost Center 4XXX</td></tr> <tr style="border-top: 1px solid black;"><td style="padding: 2px;">\$1,000 (1)</td></tr> <tr style="border-top: 1px solid black;"><td style="padding: 2px;">\$780 (2)</td></tr> </table>	Mid Tex BU 080	O&M Transportation	Acct. 853	Cost Center 4XXX	\$1,000 (1)	\$780 (2)	
SSU – Div 002																		
Cash																		
Acct. 131																		
\$1,000 (1)																		
SSU – Div 002																		
Accounts Payable																		
Acct. 232																		
\$1,000 (1)																		
\$1,000 (1)																		
Mid Tex BU 080																		
O&M Transportation																		
Acct. 853																		
Cost Center 4XXX																		
\$1,000 (1)																		
\$780 (2)																		
<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">APT BU 180</td></tr> <tr><td style="padding: 2px;">CWIP</td></tr> <tr><td style="padding: 2px;">Acct. 107</td></tr> <tr><td style="padding: 2px;">Cost Center 9XXX</td></tr> <tr style="border-top: 1px solid black;"><td style="padding: 2px;">\$220 (3)</td></tr> </table>	APT BU 180	CWIP	Acct. 107	Cost Center 9XXX	\$220 (3)	<table border="1" style="margin: auto; border-collapse: collapse;"> <tr><td style="padding: 2px;">APT BU 180</td></tr> <tr><td style="padding: 2px;">O&M Transportation</td></tr> <tr><td style="padding: 2px;">Acct. 853</td></tr> <tr><td style="padding: 2px;">Cost Center 4XXX</td></tr> <tr style="border-top: 1px solid black;"><td style="padding: 2px;">\$780 (2)</td></tr> <tr style="border-top: 1px solid black;"><td style="padding: 2px;">\$220 (3)</td></tr> </table>	APT BU 180	O&M Transportation	Acct. 853	Cost Center 4XXX	\$780 (2)	\$220 (3)						
APT BU 180																		
CWIP																		
Acct. 107																		
Cost Center 9XXX																		
\$220 (3)																		
APT BU 180																		
O&M Transportation																		
Acct. 853																		
Cost Center 4XXX																		
\$780 (2)																		
\$220 (3)																		

Flow of Activity

- (1) \$1000 in transportation expense
- (2) \$780 is allocated from Mid-Tex O&M to APT O&M
- (3) A portion of the cost is capitalized, for illustration purposes only (22%)

Service: Intercompany labor

Description: To the extent operating division employees provide labor services to an affiliate, the labor costs for the services will be charged to the appropriate affiliate.

Current Provider of Service: Louisiana Division
 Colorado-Kansas Division
 Kentucky/Mid-States Division
 Mississippi Division
 West Texas Division

Current Use of Service: UCG Storage, Inc.
 Atmos Energy Louisiana Industrial Gas, LLC
 WKG Storage, Inc.
 Trans Louisiana Gas Pipeline, Inc.
 Trans Louisiana Gas Storage, Inc.

Basis for allocation: Labor charges are captured through direct time sheet entries and transferred to the appropriate subsidiary receiving the labor services.

General Ledger Entries: Example Only

SSU BU 010	
Cash	
Acct. 131	
	\$500 (2a)

SSU BU 010	
A/R from Assoc Co.	
Acct. 146	
\$500 (2b)	

SSU BU 010	
Accounts Payable	
Acct. 232	
\$500 (2a)	\$500 (2b)

Atmos Energy Services	
AES BU 301	
Mains & Services Exp	
Acct. 8740	
(1) \$500	

Mid States BU 050-Div 002	
A/R from Assoc Co.	
Acct. 146	
	\$500 (2b)

Mid States BU 050-Div 091	
Accounts Payable	
Acct. 232	
(2b) \$500	\$500 (1)

Flow of Activity

- (1) Employee X is a Kentucky Employee. He worked on a special project in March for Atmos subsidiary, AES (Atmos Energy Services). Time is captured through a direct time sheet entry.
- (2a) Salary is paid to employee x
- (2b) JE is made to relieve payable in operating division.
 Intercompany Entry generated by Oracle to keep Operating Divisions in sync.

Service: Adjustments to Uncollectible Accounts Expense

Description: Allocation of additional expense amounts booked to adjust the Provision for Uncollectibles (Account 144)

Current Provider of Service: West Texas Division rate divisions
Louisiana Division rate divisions
Kentucky/Mid-States Division rate divisions
Colorado-Kansas Division rate divisions
Mid-Tex Division rate division
Mississippi Division rate division

Current Use of Service: West Texas Division rate divisions
Louisiana Division rate divisions
Kentucky/Mid-States Division rate divisions
Colorado-Kansas Division rate divisions
Mid-Tex Division rate division
Mississippi Division rate division

Basis of Intra-company Allocations: Costs are allocated to the rate divisions in total based on Sales Revenue or Margin.

General Ledger Entries: Example Only

Rate Division * Accumulated Provision for Uncollectible Accounts Acct. 144 sub xxxxx	Rate Division Customer Accounts - Uncollectible Accounts Acct. 904	Rate Division Customer Accounts Receivable Acct. 142 sub xxxxx
(2) \$ 250 \$ 1,000 (1)	(1) \$ 1,000	\$ 250 (2)

* Each rate division has a different allocation rate.

Flow of Activity

- (1) Monthly allocated costs.
- (2) Write off of uncollectible accounts as needed.

Service: Intra-company labor allocation – other than operating division general office labor

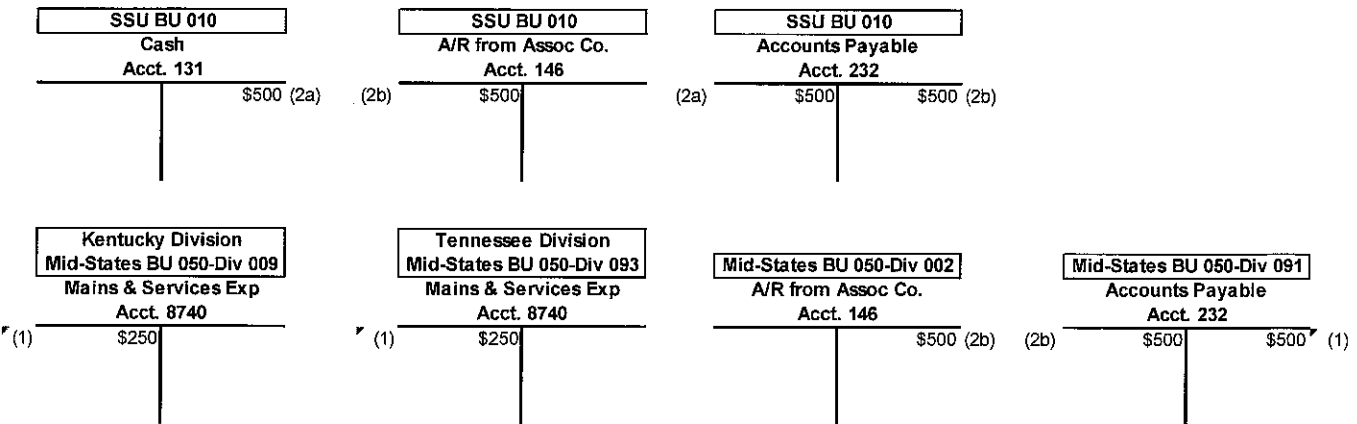
Description: Certain employee activities cross multiple rate divisions within an operating division. The costs associated with such activities include labor, benefits and associated taxes.

Current Provider of Service Atmos Pipeline – Texas Division
West Texas Division
Louisiana Division
Kentucky/Mid-States Division
Mid-Tex Division
Colorado-Kansas Division
Mississippi Division

Current Use of Service Atmos Pipeline – Texas Division
West Texas Division
Louisiana Division
Kentucky/Mid-States Division
Mid-Tex Division
Colorado-Kansas Division
Mississippi Division

Basis of Intra-company Allocations Labor associated with cross-jurisdictional activities is charged to each jurisdiction based on the level of employee activity. The costs are captured either through direct time sheet entries or fixed labor distribution percentages.

General Ledger Entries: Example Only



Flow of Activity

- (1) Employee x lives in Kentucky and works 50% in Kentucky and 50% in Tennessee every month. Time is captured through fixed labor distribution
- (2a) Salary is paid to employee x
- (2b) JE is made to relieve payable in operating division.
Intercompany Entry generated by Oracle to keep Operating Divisions in sync

Service:	Other income and interest expense (All below the line accounts)
Description:	Allocation of Shared Services' other income and interest expense (All below the line accounts)
Current Provider of Service	Shared Services
Current Use of Service	West Texas Division Louisiana Division Kentucky/Mid-States Division Mid-Tex Division Colorado-Kansas Division Mississippi Division Atmos Pipeline – Texas Division
Basis for allocation	Interest Expense, Interest Income and Other Non-Operating Income in shared services are allocated to each utility division based on the budget allocation percentages. The budget allocation is based on projected average net investment by rate division for the budget year. For this purpose, 'net investment' is defined as regulatory rate base + goodwill. These allocation factors are the same throughout the fiscal year. The allocation stays in the account the charge was originally booked in. Headquarter allocation of below the line accounts to rate divisions follows the same process as described above.

See page 33 for General Ledger Entries: Example Only.

General Ledger Entries: Example Only

SSU BU 010 Cash Acct. 131 <hr/> \$1,000	SSU BU 010 Accounts Receivable Acct. 143 <hr/> (1) \$1,000 \$1,000 (1)	SSU BU 010 Interest and Dividend Income Acct. 419 <hr/> (2) \$20 \$1,000 (1)	Div 033 Interest and Dividend Income Acct. 419 <hr/> \$20
SSU BU 010 Cash Acct. 131 <hr/> \$2,000 (3)	SSU BU 010 Accounts Receivable Acct. 143 <hr/> (3) \$2,000 \$2,000 (3)	SSU BU 010 Other Deductions * Acct. 426.5 <hr/> (3) \$2,000 \$40 (4)	Div 033 Other Deductions Acct. 426.5 <hr/> (4) \$40
SSU BU 010 Cash Acct. 131 <hr/> \$3,000 (5)	SSU BU 010 Accounts Receivable Acct. 143 <hr/> (5) \$3,000 \$3,000 (5)	SSU BU 010 Interest Expense Acct. 431 (Short Term) <hr/> (5) \$600 \$12 (6)	Div 033 Interest Expense Acct. 431 (Short Term) <hr/> (6) \$ 12
		SSU BU 010 Interest Expense Acct. 431 (Long Term) <hr/> (5) \$2,400 \$48 (6)	Div 033 Interest Expense Acct. 431 (Long Term) <hr/> (6) \$ 48

* Includes various accounts but cleared out of account 426.5

Flow of Activity

- ✓ (1) Interest and Dividend Income generated
- ✓ (2) Allocating Shared Services Income and Dividend Income to Div 33 only - Assume 2% allocation rate
- ✓ (3) Other Income and Expenses generated
- ✓ (4) Allocating Shared Services Other Deductions to Div 33 only - Assume 2% allocation rate
- ✓ (5) Interest Expense generated
- ✓ (6) Allocating Shared Services Interest Expense to Div 33 only - Assume 2% allocation rate

Service: Gas cost between state jurisdictions for contiguous systems

Description: Gas costs that apply to contiguous systems that cross state jurisdictional boundaries are allocated between those rate jurisdictions.

Current Provider of Service: West Texas Division
Colorado-Kansas Division
Kentucky/Mid-States Division

Current Use of Service: West Texas Division
Colorado-Kansas Division
Kentucky/Mid-States Division

Basis of Allocations: Allocations are based upon throughput for the West Texas Division and the Colorado-Kansas Division's Southeast Colorado/Southwest Kansas operations. For the Colorado-Kansas Division's Kansas system and for the Kentucky/Mid-States Division, demand costs are allocated based on peak-day requirements. Commodity costs are allocated based upon throughput.

Atmos Energy Corporation

General Ledger Entries: Gas Costs between state jurisdictions for contiguous systems (Example Only)

SSU BU 010 Cash Acct. 131	SSU BU 010 Accounts Payable Acct. 232
\$1,000 (1)	(1) \$1,000 \$1,000 (2)
Various BU's & Svc Areas Natural Gas City Gate Purchase Acct. 804	
(2) \$1,000	

- (1) Gas cost incurred
- (2) Gas cost paid

Service: Gas storage services between an operating division and an affiliate

Description: To the extent an operating division stores gas in a storage field owned by an affiliate, a rental fee for the use of the storage field shall be charged by the affiliate.

Current Provider of Service UCG Storage, Inc.
WKG Storage, Inc.

Current Use of Service Kentucky/Mid-States Division

Basis for allocation The annual demand charge between UCG Storage, Inc. and Atmos Energy Corporation (Tennessee operations only) is calculated based on fiscal year plant in service, gas inventory, actual operational costs incurred, and application of revenue and cost of capital conversion factors based on prior regulatory approval. In the calculation of the demand charge, costs not specifically related to a designated area are allocated to each affiliate based on the percentage of total plant servicing that affiliate.
The annual demand charge between WKG Storage, Inc. and Atmos Energy Corporation (Kentucky operation only) is based on services provided at actual cost, market rate or as otherwise provided under tariff or contract.

General Ledger Entries: Example Only

WKG Storage BU 233 Other Gas Revenues Acct. 495		KY/Mid-State BU 050, Div 009 Transportation to City Gate Acct. 8580		KY/Mid-State BU 050, Div 002 A/R from Assoc Co. Acct. 146
\$100 (1)	(1)	\$100		\$100 (2)
WKG Storage BU 233, Div 002 A/R from Assoc Co. Acct. 146		KY/Mid-State BU 050, Div 002 A/R from Assoc Co. Acct. 146		
\$100 (2)		\$100 (2)		

Flow of Activity - East Diamond Storage Facility

- 1 Monthly demand charge for the East Diamond Storage Facility
- 2 Intercompany Entry generated by Oracle to keep Operating Divisions in sync

UCG Storage BU 232 Other Gas Revenues Acct. 495		KY/Mid-State BU 050, Div 009 Other gas supply expenses Acct. 813		KY/Mid-State BU 050, Div 002 A/R from Assoc Co. Acct. 146
\$100 (1)	(1)	\$100		\$100 (2)
WKG Storage BU 232, Div 002 A/R from Assoc Co. Acct. 146		KY/Mid-State BU 050, Div 002 A/R from Assoc Co. Acct. 146		
\$100 (2)		\$100 (2)		

Flow of Activity - Barnsley Storage Facility

- 1 Monthly demand charge for the Barnsley Storage Facility
- 2 Intercompany Entry generated by Oracle to keep Operating Divisions in sync

Service: Working capital funds management (Intercompany account)

Description: Funds are invested on behalf of or provided to affiliates based on operations.

Current Provider of Service:	Atmos Energy Corporation	Atmos Energy Holdings, Inc.
Current Use of Service:	Atmos Energy Holdings, Inc.	Atmos Energy Corporation
Interest Income/Expense Calculation (See Below)	A	B

Basis for allocation Interest income or expense is recognized each month at the subsidiaries' level based on the total average outstanding balance of all intercompany receivable/payable balances using the following rates:

A (AEH is the borrower)

Expense – One month LIBOR (last day of the month) plus 300 basis points

Income – One month LIBOR (last day of the month)

B (AEC is the borrower)

Expense – The lowest outstanding CP rate or the Eurodollar rate under the AEC Credit Facility (Credit Ag), which is LIBOR plus 100

Income – One month LIBOR (last day of the month)

Atmos Energy Corporation

General Ledger Entries: Working Capital Funds Management (Example Only)

<p>SSU BU 010 Interest and Dividend Income Acct. 419</p> <hr style="border: 1px solid black;"/>	<p>\$1,000 (1)</p>
<p>AEH BU 312 Other Interest Expense Acct. 431</p> <hr style="border: 1px solid black;"/>	<p>(1) \$1,000</p>

(1) Interest Income and/or expense is recognized each month at the subsidiaries' level

Service: Gas storage services provided between affiliates

Description: To the extent an affiliate stores gas in a storage field owned by another affiliate, a fee for the use of the storage field shall be charged.

Current Provider of Service: Trans Louisiana Gas Storage, Inc.

Current Use of Service: Trans Louisiana Gas Pipeline, Inc.

Basis for allocation: The fee to the affiliate utilizing the storage service is based on services provided at actual cost, market rate or as otherwise provided under tariff.

General Ledger Entries: Example Only

BU 234	
Accounts Receivable from Associated Company Acct. 146	

\$100	

BU 234	
Revenue Transportation - Industrial Acct. 4896	

	\$100

BU 303	
Accounts Receivable from Associated Company Acct. 146	

	\$100

BU 303	
Other Gas Supply Expense Acct. 813	

\$100	

Service: Property Insurance

Description: Blueflame Insurance Services, LTD provides a direct property insurance policy. The policy covers the property against all risks of direct physical loss or damage.

Current Provider of Service Blueflame Insurance Services, LTD

Current Use of Service Kentucky/Mid-States Division
 Colorado-Kansas Division
 Shared Services
 Louisiana Division
 Mississippi Division
 Mid-Tex Division
 West Texas Division
 Atmos Pipeline – Texas Division
 Atmos Energy Louisiana Industrial Gas, LLC
 Atmos Exploration & Production, Inc.
 Atmos Energy Services, LLC
 Atmos Power Systems, Inc.
 Trans Louisiana Gas Pipeline, Inc.
 Trans Louisiana Gas Storage, Inc.
 UCG Storage, Inc.
 WKG Storage, Inc.
 Atmos Gathering Company, LLC

Basis for allocation Atmos Energy Corporation is invoiced by Blueflame Insurance Services. Costs are allocated based on the gross property, plant and equipment and gas stored underground balances of each affiliate at a rate division level.

General Ledger Entries: Example Only

<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Cash</td></tr> <tr><td style="text-align: center;">Acct. 131</td></tr> <tr><td style="text-align: right;">\$1,200 (1)</td></tr> </table>	SSU BU 010	Cash	Acct. 131	\$1,200 (1)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Accounts Payable</td></tr> <tr><td style="text-align: center;">Acct. 232</td></tr> <tr><td style="text-align: left;">(1) \$1,200</td></tr> <tr><td style="text-align: right;">\$1,200 (1)</td></tr> </table>	SSU BU 010	Accounts Payable	Acct. 232	(1) \$1,200	\$1,200 (1)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">SSU BU 010</td></tr> <tr><td style="text-align: center;">Prepayments</td></tr> <tr><td style="text-align: center;">Acct. 165</td></tr> <tr><td style="text-align: left;">(1) \$1,200</td></tr> <tr><td style="text-align: right;">\$100 (2)</td></tr> </table>	SSU BU 010	Prepayments	Acct. 165	(1) \$1,200	\$100 (2)
SSU BU 010																
Cash																
Acct. 131																
\$1,200 (1)																
SSU BU 010																
Accounts Payable																
Acct. 232																
(1) \$1,200																
\$1,200 (1)																
SSU BU 010																
Prepayments																
Acct. 165																
(1) \$1,200																
\$100 (2)																
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="text-align: center;">General Office</td></tr> <tr><td style="text-align: center;">CO/KS BU 060</td></tr> <tr><td style="text-align: center;">Property Insurance</td></tr> <tr><td style="text-align: center;">Acct. 924</td></tr> <tr><td style="text-align: left;">(2) (3) \$100</td></tr> </table>			General Office	CO/KS BU 060	Property Insurance	Acct. 924	(2) (3) \$100									
General Office																
CO/KS BU 060																
Property Insurance																
Acct. 924																
(2) (3) \$100																

Flow of Activity

- (1) Purchase of property insurance
- (2) Monthly amortization to rate divisions
- (3) Amounts remaining in SSU cost centers are allocated to the divisions using the method described on pages 11 and 12.

Service: Intercompany Interest on Notes Payable

Description: Intercompany Interest on Notes Payable

Current Provider Of Services Shared Services

Current Use of Service Atmos Energy Holdings, Inc.

Current Provider of Service:	Atmos Energy Corporation	Atmos Energy Holdings, Inc.
Current Use of Service:	Atmos Energy Holdings, Inc.	Atmos Energy Corporation
Interest Income/Expense Calculation (See Below)	A	B

Basis for allocation Interest income and expense is recognized each month at the subsidiaries' level using the following rates:

A (AEH is the borrower)

Expense – One month LIBOR (last day of the month) plus 300 basis points

Income – One month LIBOR (last day of the month)

B (AEC is the borrower)

Expense – The lowest outstanding CP rate or the Eurodollar rate under the AEC Credit Facility (Credit Ag), which is LIBOR plus 100

Income – One month LIBOR (last day of the month)

General Ledger Entries: Example Only

<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Shared Services</td> </tr> <tr> <td style="text-align: center;">Accounts Receivable from Associated Company Acct. 146</td> </tr> <tr> <td style="border-top: 1px solid black; text-align: right;">\$1,000 (1)</td> </tr> </table>	Shared Services	Accounts Receivable from Associated Company Acct. 146	\$1,000 (1)	(1)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Shared Services</td> </tr> <tr> <td style="text-align: center;">Interest on Debt to Associated Companies Acct. 431</td> </tr> <tr> <td style="border-top: 1px solid black; text-align: left;">\$1,000</td> </tr> </table>	Shared Services	Interest on Debt to Associated Companies Acct. 431	\$1,000
Shared Services								
Accounts Receivable from Associated Company Acct. 146								
\$1,000 (1)								
Shared Services								
Interest on Debt to Associated Companies Acct. 431								
\$1,000								
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Atmos Energy Holdings, Inc.</td> </tr> <tr> <td style="text-align: center;">Accounts Receivable from Associated Company Acct. 146</td> </tr> <tr> <td style="border-top: 1px solid black; text-align: left;">(1) \$1,000</td> </tr> </table>	Atmos Energy Holdings, Inc.	Accounts Receivable from Associated Company Acct. 146	(1) \$1,000	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Atmos Energy Holdings, Inc.</td> </tr> <tr> <td style="text-align: center;">Interest and Dividend Income Acct. 419</td> </tr> <tr> <td style="border-top: 1px solid black; text-align: right;">\$1,000 (1)</td> </tr> </table>	Atmos Energy Holdings, Inc.	Interest and Dividend Income Acct. 419	\$1,000 (1)	
Atmos Energy Holdings, Inc.								
Accounts Receivable from Associated Company Acct. 146								
(1) \$1,000								
Atmos Energy Holdings, Inc.								
Interest and Dividend Income Acct. 419								
\$1,000 (1)								

Flow of Activity

(1) Intercompany Interest on Notes Payable is recognized each month at the subsidiary level.

Appendix A

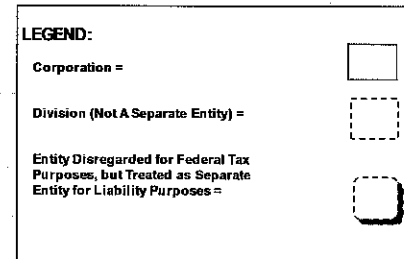
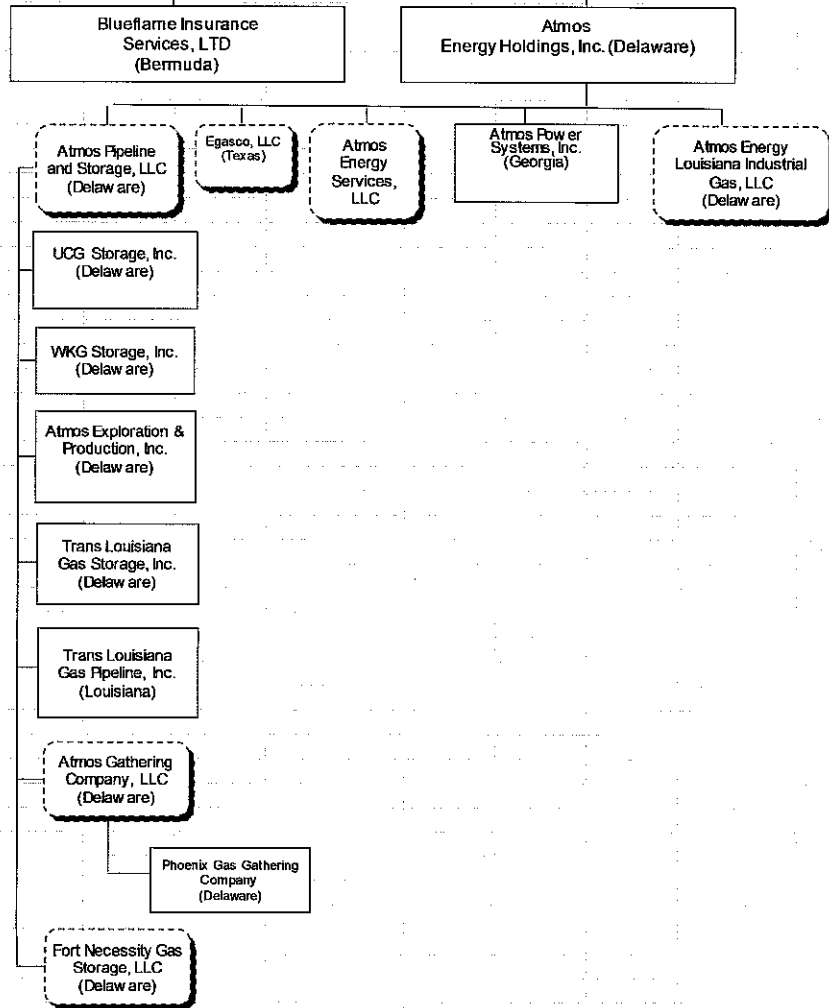
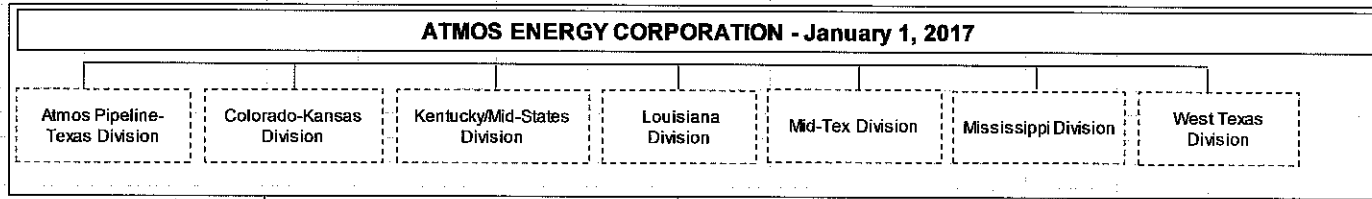


EXHIBIT 2

B1

A complete, detailed organizational chart identifying each regulated utility and each associate company.

Please see page 40 of the Cost Allocation Manual (CAM).

EXHIBIT 3

B2

A detailed description of the activities and business conducted at each non-utility associate company.

Please see pages 6 and 7 of the Cost Allocation Manual (CAM).

EXHIBIT 4

B3

An organizational chart of personnel that includes a list of all directors, corporate officers, and other key personnel shared by any jurisdictional public utility and any non-utility associate company or holding company, if any, along with a description of each person's duties and responsibilities to each entity.

Please see last page of the Atmos Energy Corporation 2018 Integrated Annual Report for a listing of our Senior Management Officers and Board Members. The Summary Annual Report can be found at <https://www.atmosenergy.com/sites/default/files/2018-10k-crr.pdf>.

EXHIBIT 5

B4

Summaries of each mortgage, loan document and debt agreement including a discussion of the type of collateral or security pledged to support the debt. The utility will also describe any loan or debt agreement taken out to finance an unregulated affiliate that encumbers utility property or cash-flow for security.

Our debt agreements are explained in the Debt Footnote on pages 58-59 of our Fiscal 2018 10-K filing. The 10-K can be found at https://www.atmosenergy.com/sites/default/files/10-k_18_0.pdf.

EXHIBIT 6

B5

To the extent financial separations are maintained for either legal or financial accounting purposes and at a level in which financial statements are reasonably capable of being produced by the utility's accounting system, each jurisdictional public utility shall file income statements, balance sheets and cash flow statements for (1) consolidated utility operations; (2) consolidated non-regulated operations; and (3) consolidated corporate financials.

(1) and (2) Income statements and selected balance sheet data for our Distribution and Pipeline and Storage segments can be found in the Segment Information Footnote on pages 54-57 of our Fiscal 2018 10-K filing. The 10-K can be found at https://www.atmosenergy.com/sites/default/files/10-k_18_0.pdf. The cash flow statement is prepared on a consolidated basis only. Please note that we sold our non-regulated Atmos Energy Marketing operations in January 2017 and no longer report a non-regulated operations segment in our Form 10-K financial statements.

(3) A consolidated corporate balance sheet can be found on page 42 of our 2018 10-K; a consolidated corporate income statement can be found on page 43 of our 2018 10-K; and a copy of our consolidated corporate cash flow statement can be found on page 46 of our 2018 10-K. As noted above, the 2018 10-K can be found at https://www.atmosenergy.com/sites/default/files/10-k_18_0.pdf.

EXHIBIT 7

B6

To the extent financial separations are maintained for either legal or financial accounting purposes and at a level in which financial statements are reasonably capable of being produced by the utility's accounting system, each jurisdictional public utility shall file a summary of financial ratios as of the end of the last completed fiscal year, as described by way of example in the attachment to these rules and consistent with the method used to report such information to the principal bond rating agency or Standard & Poors for (1) consolidated utility operations; (2) consolidated non-regulated operations; and (3) consolidated corporate financials.

At 9/30/18

(1) Distribution Operations:

Total Debt to Total Capitalization	44.3%
Funds from Operations Interest Coverage	5.3
Funds from Operations as a % of Total Debt	19.7%

The Distribution segment is primarily comprised of our regulated natural gas distribution and related sales operations in eight states.

(2) Pipeline and Storage Operations:

Total Debt to Total Capitalization	0.00 (a)
Funds from Operations Interest Coverage	N/A
Funds from Operations as a % of Total Debt	N/A (a)

The Pipeline and Storage segment is comprised primarily of the pipeline and storage operations of our Atmos Pipeline - Texas division and our natural gas transmission operations in Louisiana.

Our Pipeline and Storage segment had no debt outstanding at 9/30/18.

(3) Consolidated Operations:

Total Debt to Total Capitalization	43.3%
Funds from Operations Interest Coverage	7.3
Funds from Operations as a % of Total Debt	30.6%

Please note that our nonregulated Atmos Energy Marketing operations were sold in January 2017.

Financial Ratio Support
At September 30, 2018

Total Debt to Total Capitalization:	Distribution	Pipeline and Storage	Consolidated ⁽¹⁾	Source
	In thousands			
Numerator:				
+ Notes payable	146,000	-	-	SmartView
+ Commercial paper	575,780	-	575,780	10-K / SmartView
+ Current maturities	575,000	-	575,000	10-K
+ Current capitalized lease obligations	-	-	-	10-K Support, 'S4 FMin Lease Prmts FY18 - FINAL'
+ Long term debt	2,493,665	-	2,493,665	10-K
+ Capitalized lease obligations (less current)	-	-	-	10-K Support, 'S4 FMin Lease Prmts FY18 - FINAL'
+ Total OBS Debt ⁽²⁾	-	-	-	N/A
	<u>3,790,445</u>	<u>-</u>	<u>3,644,445</u>	
Denominator:				
+ Notes payable	146,000	-	-	SmartView
+ Commercial paper	575,780	-	575,780	10-K / SmartView
+ Current maturities	575,000	-	575,000	10-K
+ Current capitalized lease obligations	-	-	-	10-K Support, 'S4 FMin Lease Prmts FY18 - FINAL'
+ Long term debt	2,493,665	-	2,493,665	10-K
+ Capitalized lease obligations (less current)	-	-	-	10-K Support, 'S4 FMin Lease Prmts FY18 - FINAL'
+ Common equity	4,769,951	993,450	4,769,951	Balance Sheet - Segment Preparation File September 2018
+ Total OBS Debt ⁽²⁾	-	-	-	N/A
	<u>8,560,396</u>	<u>993,450</u>	<u>8,414,396</u>	
Total Debt to Total Capitalization	44.3%	0.0%	43.3%	

Funds from Operations Interest Coverage:	Distribution	Pipeline and Storage	Consolidated ⁽¹⁾	Source
	In thousands			
Numerator:				
+ Net income from continuing operations	442,966	160,098	603,064	10-K Segment
+ Depreciation, depletion & amortization	264,930	96,153	361,083	10-K Segment
+ Deferred income taxes (net)	42,297	115,974	158,271	SmartView, 10-K Consolidated Cash Flow Statement
+ Investment tax credit amortization	-	-	-	SmartView
- AFDC debt	3,241	3,570	6,810	SmartView
- AFDC equity	-	-	-	N/A
+ (Income) loss from equity investments	-	-	-	N/A
+ (Gain) loss on property	-	-	-	10-K Consolidated Cash Flow Statement
+ Deferred income taxes adjustment	-	-	-	N/A
Total Funds from Operations (FFO)	<u>746,952</u>	<u>368,655</u>	<u>1,115,608</u>	
+ Cash interest paid (net of interest capitalized)	169,987	-	169,987	10-K Consolidated Cash Flow Statement
+ AFDC debt	3,241	3,570	6,810	SmartView
- Interest expense adjustment	-	-	-	N/A
+ Interest on OBS debt ⁽²⁾	-	-	-	N/A
	<u>920,180</u>	<u>372,225</u>	<u>1,292,405</u>	
Denominator:				
+ Interest expense (net)	169,987	-	169,987	From line 41 above
- Interest expense adjustment	-	-	-	N/A
+ AFDC debt	3,241	3,570	6,810	SmartView
+ Interest on OBS debt ⁽²⁾	-	-	-	N/A
	<u>173,228</u>	<u>3,570</u>	<u>176,797</u>	
Funds from Operations Interest Coverage	5.3	104.3	7.3	

Funds from Operations as a % of Total Debt:	Distribution	Pipeline and Storage	Consolidated ⁽¹⁾	Source
	In thousands			
Numerator:				
Total Funds from Operations (FFO)	746,952	368,655	1,115,608	From line 40 above
+ Depreciation adjustment for operating leases	-	-	-	N/A
	<u>746,952</u>	<u>368,655</u>	<u>1,115,608</u>	
Denominator:				
Total Debt (from first table above)	3,790,445	-	3,644,445	From line 13 above
Funds from Operations as a % of Total Debt	19.7%	N/A	30.6%	

Notes:

⁽¹⁾ The Consolidated amounts include intercompany eliminations.

⁽²⁾ The Company does have operating leases which are described on page 75 of our 2018 10-K. We have historically not included operating leases in our Total Debt to Total Capitalization ratio so we have excluded them from the calculation. We have also excluded the operating leases in the FFO Interest Coverage for consistency.

EXHIBIT 8

[copyright protected]