BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Atmos)	
Energy Corporation for Adjustment of its)	Docket No. 19-ATMG-525-RTS
Natural Gas Rates in the State of Kansas.)	

NOTICE OF FILING OF STAFF TESTIMONY

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) and for its Notice of Filing of Staff Testimony states as follows:

The attached testimony was designated "Confidential" when initially filed on October 31, 2019. However, due to the recent 10-K filing on behalf of Atmos Energy Corporation, the following information is no longer deemed confidential and thus shall be filed without redactions.

WHEREFORE, Staff submits its Notice of Filing of Staff testimony for Commission consideration.

Respectfully Submitted,

Cole Bailey, S. Ct. #27586

Litigation Counsel

Kansas Corporation Commission

1500 S.W. Arrowhead Road

Topeka, Kansas 66604-4027

E-Mail: c.bailey@kcc.ks.gov

In the Matter of the Application of)
Atmos Energy Corporation for) DOCKET NO. 19-ATMG-525-RTS
Adjustment of its Natural Gas) DOCKET NO. 19-ATMG-323-KTS
Rates in the State of Kansas)

CONFIDENTIAL SCHEDULES

PREPARED BY

STAFF

UTILITIES DIVISION

KANSAS CORPORATION COMMISSION

ATMOS ENERGY TOTAL KANSAS DOCKET NO. 19-ATMG-525-RTS

SCHEDULE	INDEV
NUMBER	INDEX
REV REQ	REVENUE REQUIREMENT WORKSHEET
A-1	STAFF ADJUSTED AND PRO FORMA RATE BASE
A-2	STAFF ADJUSTMENTS TO APPLICANT ADJUSTED RATE BASE
A-3	EXPLANATION OF STAFF ADJUSTMENTS TO RATE BASE
B-1	STAFF ADJUSTED AND PRO FORMA OPERATING INCOME STATEMENT
B-2	STAFF ADJUSTMENTS TO APPLICANT ADJUSTED INCOME STATEMENT
B-3	EXPLANATION OF STAFF ADJUSTMENTS TO OPERATIONS
B-4	STAFF ADJUSTED AND PRO FORMA CALCULATION OF TAXABLE INCOME
B-4-1	INTEREST CALCULATION
C-1	CAPITAL STRUCTURE
C-2	ADJUSTMENTS TO CAPITAL STRUCTURE
C-3	EXPLANATION OF STAFE ADJUSTMENTS TO CAPITAL STRUCTURE

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY SCHEDULE REV REQ

TOTAL KANSAS STAFF REVENUE REQUIREMENT FOR THE TEST YEAR ENDED MARCH 31, 2019

LINE NO. * * * * *	DESCRIPTION ************************************	STAFF ADJUSTED
1	PROFORMA RATE BASE	242,482,567
2	STAFF RATE OF RETURN	7.0200%
3	OPERATING INCOME REQUIRED	17,022,276
4	OPERATING INCOME	15,040,309
5	DIFFERENCE	1,981,967
6	INCOME TAX FACTOR	0.73470
7	PROFORMA REVENUE INCREASE	2,697,655

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY SCHEDULE A-1

TOTAL KANSAS STAFF ADJUSTED AND PRO FORMA RATE BASE FOR THE TEST YEAR ENDED MARCH 31, 2019

NO. DESCRIPTION BOOKS ADJUSTMENTS ADJUSTED ADJUSTMENTS ADJUSTMENTS *** *********************************	STAFF PRO FORMA ******* 41,078 0 6,804,626 1,779,122 370,345,174
NO. DESCRIPTION BOOKS ADJUSTMENTS ADJUSTM	FORMA ******* 41,078 0 6,804,626 1,779,122
CAS PLANT IN SERVICE: INTANGIBLE PLANT	41,078 0 6,804,626 1,779,122
GAS PLANT IN SERVICE: 1 INTANGIBLE PLANT	41,078 0 6,804,626 1,779,122
INTANGIBLE PLANT	0 6,804,626 1,779,122
2 PRODUCTION AND GATHERING PLANT 0 0 0 0 0 0 3 UNDERGROUND STORAGE 6,509,724 0 6,509,724 294,902 6,804,626 4 TRANSMISSION PLANT 1,779,122 0 1,779,122 0 1,779,122 5 DIRECT AND ALLOCATED DISTRIBUTION PLANT 362,954,687 0 362,954,687 7,390,487 370,345,174 6 DIRECT AND ALLOCATED GENERAL PLANT 23,107,463 0 23,107,463 154,680 23,262,143 7 CONSTRUCTION WORK IN PROGRESS 2,168,238 8,941,905 11,110,143 (11,110,143) 0 8 TOTAL GAS PLANT IN SERVICE 396,560,312 8,941,905 405,502,217 (3,270,074) 402,232,143 0 9 ACCUMULATED DEPRECIATION & AMORT. 119,803,444 0 119,803,444 2,161,428 121,964,872 10 NET GAS PLANT IN SERVICE 276,756,868 8,941,905 285,698,773 (5,431,502) 280,267,271 0	0 6,804,626 1,779,122
3 UNDERGROUND STORAGE 6,509,724 0 6,509,724 294,902 6,804,626 4 TRANSMISSION PLANT 1,779,122 0 1,779,122 0 1,779,122 5 DIRECT AND ALLOCATED DISTRIBUTION PLANT 362,954,687 0 362,954,687 7,390,487 370,345,174 6 DIRECT AND ALLOCATED GENERAL PLANT 23,107,463 0 23,107,463 154,680 23,262,143 7 CONSTRUCTION WORK IN PROGRESS 2,168,238 8,941,905 11,110,143 (11,110,143) 0 8 TOTAL GAS PLANT IN SERVICE 396,560,312 8,941,905 405,502,217 (3,270,074) 402,232,143 0 9 ACCUMULATED DEPRECIATION & AMORT. 119,803,444 0 119,803,444 2,161,428 121,964,872 10 NET GAS PLANT IN SERVICE 276,756,868 8,941,905 285,698,773 (5,431,502) 280,267,271 0	6,804,626 1,779,122
4 TRANSMISSION PLANT 1,779,122 0 1,779,122 0 1,779,122 5 DIRECT AND ALLOCATED DISTRIBUTION PLANT 362,954,687 0 362,954,687 7,390,487 370,345,174 6 DIRECT AND ALLOCATED GENERAL PLANT 23,107,463 0 23,107,463 154,680 23,262,143 7 CONSTRUCTION WORK IN PROGRESS 2,168,238 8,941,905 11,110,143 (11,110,143) 0 8 TOTAL GAS PLANT IN SERVICE 396,560,312 8,941,905 405,502,217 (3,270,074) 402,232,143 0 9 ACCUMULATED DEPRECIATION & AMORT. 119,803,444 0 119,803,444 2,161,428 121,964,872 10 NET GAS PLANT IN SERVICE 276,756,868 8,941,905 285,698,773 (5,431,502) 280,267,271 0	1,779,122
5 DIRECT AND ALLOCATED DISTRIBUTION PLANT 362,954,687 0 362,954,687 7,390,487 370,345,174 6 DIRECT AND ALLOCATED GENERAL PLANT 23,107,463 0 23,107,463 154,680 23,262,143 7 CONSTRUCTION WORK IN PROGRESS 2,168,238 8,941,905 11,110,143 (11,110,143) 0 8 TOTAL GAS PLANT IN SERVICE 396,560,312 8,941,905 405,502,217 (3,270,074) 402,232,143 0 9 ACCUMULATED DEPRECIATION & AMORT. 119,803,444 0 119,803,444 2,161,428 121,964,872 10 NET GAS PLANT IN SERVICE 276,756,868 8,941,905 285,698,773 (5,431,502) 280,267,271 0	
6 DIRECT AND ALLOCATED GENERAL PLANT 7 CONSTRUCTION WORK IN PROGRESS 2,168,238 8,941,905 11,110,143 (11,110,143) 0 8 TOTAL GAS PLANT IN SERVICE 396,560,312 8,941,905 405,502,217 (3,270,074) 402,232,143 0 9 ACCUMULATED DEPRECIATION & AMORT. 119,803,444 0 119,803,444 2,161,428 121,964,872 10 NET GAS PLANT IN SERVICE 276,756,868 8,941,905 285,698,773 (5,431,502) 280,267,271 0	
7 CONSTRUCTION WORK IN PROGRESS 2,168,238 8,941,905 11,110,143 (11,110,143) 0 8 TOTAL GAS PLANT IN SERVICE 396,560,312 8,941,905 405,502,217 (3,270,074) 402,232,143 0 9 ACCUMULATED DEPRECIATION & AMORT. 119,803,444 0 119,803,444 2,161,428 121,964,872 10 NET GAS PLANT IN SERVICE 276,756,868 8,941,905 285,698,773 (5,431,502) 280,267,271 0	23,262,143
8 TOTAL GAS PLANT IN SERVICE 396,560,312 8,941,905 405,502,217 (3,270,074) 402,232,143 0 9 ACCUMULATED DEPRECIATION & AMORT. 119,803,444 0 119,803,444 2,161,428 121,964,872 10 NET GAS PLANT IN SERVICE 276,756,868 8,941,905 285,698,773 (5,431,502) 280,267,271 0	0
9 ACCUMULATED DEPRECIATION & AMORT. 119,803,444 0 119,803,444 2,161,428 121,964,872 10 NET GAS PLANT IN SERVICE 276,756,868 8,941,905 285,698,773 (5,431,502) 280,267,271 0	
10 NET GAS PLANT IN SERVICE 276,756,868 8,941,905 285,698,773 (5,431,502) 280,267,271 0	402,232,143
10 NET GAS PLANT IN SERVICE 276,756,868 8,941,905 285,698,773 (5,431,502) 280,267,271 0	
	121,964,872
WORKING CAPITAL:	280,267,271
WORKING CAPITAL:	
11 PREPAYMENTS 1,406,259 0 1,406,259 62,178 1,468,437	1,468,437
12 MATERIALS & SUPPLIES 0 0 0 0	0
13 STORAGE GAS 8,179,691 0 8,179,691 527,781 8,707,472	8,707,472
14 CASH WORKING CAPITAL 0 0 0 0 0	0
15 ACCUMULATED DEFERRED FIT & SIT (34,436,930) 8,009,518 (26,427,412) (979,932) (27,407,344)	(27,407,344)
16 CUSTOMER ADVANCES FOR CONSTRUCTION (623,571) 0 (623,571) 0 (623,571)	(623,571)
17 REGULATORY LIABILITY (18,681,171) 0 (18,681,171) (446,424) (19,127,595)	(19,127,595)
18 CUSTOMER DEPOSITS (822,630) (19,975) (842,605) 40,502 (802,103)	(802,103)
19 TOTAL RATE BASE - KANSAS 231,778,516 16,931,448 248,709,964 (6,227,397) 242,482,567 0	242,482,567

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY SCHEDULE A-2 TOTAL KANSAS

STAFF ADJUSTMENTS TO APPLICANT ADJUSTED RATE BASE FOR THE TEST YEAR ENDED MARCH 31, 2019

		A	B	C	D	E	F	G	H	I	J	K
LINE		A DDI ICANE	STAFF	STAFF	STAFF	STAFF	STAFF	STAFF	STAFF	STAFF	TOTAL CTAFE	OT A DE
LINE	P.E.G. GRADENOV		ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	TOTAL STAFF	STAFF
NO.	DESCRIPTION	ADJUSTED	NO. 1	NO. 2	NO. 3	NO. 4	NO. 5	NO. 6	NO. 7	NO. 8	ADJUSTMENTS	ADJUSTED
****	CACDIANE IN CEDITICE		*****	****	*****		* * * * * * * * * *	*****	****	****	*****	*****
	GAS PLANT IN SERVICE:	41.070		0								41.070
1	INTANGIBLE PLANT	41,078		0							0	41,078
2	PRODUCTION AND GATHERING PLANT	0		204.002							20.4.002	0
3	UNDERGROUND STORAGE	6,509,724		294,902							294,902	6,804,626
4	TRANSMISSION PLANT	1,779,122		# 200 to#							0	1,779,122
5	DIRECT AND ALLOCATED DISTRIBUTION PLANT	362,954,687		7,390,487							7,390,487	370,345,174
6	DIRECT AND ALLOCATED GENERAL PLANT	23,107,463		154,680							154,680	23,262,143
7	CONSTRUCTION WORK IN PROGRESS	11,110,143	(11,110,143)								(11,110,143)	0
0	TOTAL GAS PLANT IN SERVICE	405,502,217	(11,110,143)	7,840,069	0	0	0	0	0	0	(3,270,074)	402,232,143
8	TOTAL GAS PLANT IN SERVICE	403,302,217	(11,110,143)	7,840,069	U	U	U	U	U	U	(3,270,074)	402,232,143
9	ACCUMULATED DEPRECIATION & AMORT.	119,803,444			2,161,428						2,161,428	121,964,872
	The confedent as a second of the confedence of t	117,005,			2,101,120						2,101,120	121,501,072
10	NET GAS PLANT IN SERVICE	285,698,773	(11,110,143)	7,840,069	(2,161,428)	0	0	0	0	0	(5,431,502)	280,267,271
	WORKING CAPITAL:											
11	PREPAYMENTS	1,406,259						62,178			62,178	1,468,437
12	MATERIALS & SUPPLIES	1,400,239						02,176			02,178	1,408,437
12	STORAGE GAS	8,179,691							527,781		527,781	8,707,472
1.7	CASH WORKING CAPITAL	0,179,091							327,761		0	0,707,472
15	ACCUMULATED DEFERRED FIT & SIT	(26,427,412)				(1,081,792)				101,860	(979,932)	(27,407,344)
16	CUSTOMER ADVANCES FOR CONSTRUCTION	(623,571)				(1,001,792)				101,800	(979,932)	(623,571)
17	REGULATORY LIABILITY	(18,681,171)								(446,424)		(19,127,595)
17	CUSTOMER DEPOSITS	(842,605)					40,502			(440,424)	(446,424) 40,502	(802,103)
16	CUSTOWER DEPOSITS	(042,003)					40,302				40,302	(002,103)
19	TOTAL RATE BASE - KANSAS	248,709,964	(11,110,143)	7,840,069	(2,161,428)	(1,081,792)	40,502	62,178	527,781	(344,564)	(6,227,397)	242,482,567

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY SCHEDULE A-3

TOTAL KANSAS

EXPLANATION OF STAFF ADJUSTMENTS TO RATE BASE FOR THE TEST YEAR ENDED MARCH 31, 2019

1 STAFF ADJUSTMENT NO 2 CONSTRUCTION WORK		INCREASE / (DECREASE) TO RATE BASE ************************************
7 DIRECT AND ALLOCAT	AGE ED DISTRIBUTION PLANT	294,902 7,390,487 154,680
9 STAFF ADJUSTMENT NO 10 ACCUMULATED DEPRE 11 Staff's adjustment to reflect		(2,161,428)
12 STAFF ADJUSTMENT NO 13 ACCUMULATED DEFER 14 Staff's adjustment to reflect		(1,081,792)
15 STAFF ADJUSTMENT NO 16 CUSTOMER DEPOSITS 17 Staff's adjustment to update	O. 5 (Hutton) Customer Deposits to balances as of August 31, 2019.	40,502
18 STAFF ADJUSTMENT No. 19 PREPAYMENTS 20 Staff's adjustment to update	O. 6 (Hutton) Prepayments to 13 month average ending August 31, 2019.	62,178
 21 STAFF ADJUSTMENT No 22 STORAGE GAS 23 Staff's adjustment to update 	O. 7 (Hutton) Storage Gas to balances as of August 31, 2019.	527,781
 24 STAFF ADJUSTMENT NO 25 ACCUMULATED DEFER 26 REGULATORY LIABILIT 27 Staff's adjustment to update 	RED FIT & SIT	101,860 (446,424)

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY SCHEDULE B-1 TOTAL KANSAS

STAFF ADJUSTED AND PRO FORMA OPERATING INCOME STATEMENT FOR THE TEST YEAR ENDED MARCH 31, 2019

5 OTHER GAS SU 6 TRANSMISSION 7 DISTRIBUTION 8 CUSTOMER AC	ESCRIPTION ********	APPLICANT JURISDICTIONAL PER BOOKS ********	APPLICANT TEST YEAR ADJUSTMENTS *******	APPLICANT ADJUSTED ******	STAFF TEST YEAR ADJUSTMENTS *******	E STAFF ADJUSTED *******	F STAFF PRO FORMA ADJUSTMENTS ********	G STAFF PRO FORMA *******
2 COST OF GAS 3 NET MARGIN OPERATING EX 4 NATURAL GAS 5 OTHER GAS SU 6 TRANSMISSION 7 DISTRIBUTION 8 CUSTOMER AC		120 500 1 51	(2.150.555)	127 210 705	(2.15.0.10)	125 002 550	2 505 555	125 500 222
3 NET MARGIN OPERATING EX NATURAL GAS OTHER GAS SU TRANSMISSION DISTRIBUTION CUSTOMER AC	S	128,508,161 (65,548,277)	(3,158,575)	125,349,586 (65,548,277)	(346,918)	125,002,668 (65,548,277)	2,697,655	127,700,323 (65,548,277)
OPERATING EX NATURAL GAS OTHER GAS SU TRANSMISSION DISTRIBUTION CUSTOMER AC		(03,340,211)		(03,340,211)	0	(03,540,277)		(03,340,211)
4 NATURAL GAS 5 OTHER GAS SU 6 TRANSMISSION 7 DISTRIBUTION 8 CUSTOMER AC		62,959,884	(3,158,575)	59,801,309	(346,918)	59,454,391	2,697,655	62,152,046
4 NATURAL GAS 5 OTHER GAS SU 6 TRANSMISSION 7 DISTRIBUTION 8 CUSTOMER AC								
5 OTHER GAS SU 6 TRANSMISSION 7 DISTRIBUTION 8 CUSTOMER AC				• • • •				
6 TRANSMISSION 7 DISTRIBUTION 8 CUSTOMER AC	PROD. & GATHERING	3,899	0	3,899	0	3,899		3,899
7 DISTRIBUTION8 CUSTOMER AC		687,191	0	687,191	0	687,191		687,191
8 CUSTOMER AC		47,121	0	47,121	0	47,121		47,121
		7,478,064	0	7,478,064	24,056	7,502,120		7,502,120
		1,664,433	0	1,664,433	(23,894)	1,640,539		1,640,539
9 CUSTOMER SEI	RVICE	145,534	0	145,534	(3,326)	142,208		142,208
10 SALES		144,259	(91,494)	52,765	(1,373)	51,392		51,392
11 ADMINISTRAT	IVE AND GENERAL	12,322,640	(1,094,968)	11,227,672	(845,685)	10,381,987		10,381,987
12 TOTAL OPERA	TING EXPENSES	22,493,141	(1,186,462)	21,306,679	(850,222)	20,456,457	0	20,456,457
13 DEPRECIATION	N AND AMORTIZATION	12,235,600	2,323,233	14,558,833	(2,413,239)	12,145,594		12,145,594
14 TAXES OTHER	THAN INCOME TAXES	8,965,903	98,118	9,064,021	(57,415)	9,006,606		9,006,606
15 INTEREST ON C	CUSTOMER DEPOSITS	9,890	13,029	22,919	0	22,919		22,919
16 INCOME TAXES	S - CURRENT & DEFERRED	1,561,405	488,928	2,050,333	732,173	2,782,506	715,688	3,498,194
17 TOTAL EXPENS	SES	45,265,939	1,736,846	47,002,785	(2,588,703)	44,414,082	715,688	45,129,770
18 OPERATING IN	COME	17,693,945	(4,895,421)	12,798,524	2,241,785	15,040,309	1,981,967	17,022,276

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY SCHEDULE B-2 TOTAL KANSAS

STAFF ADJUSTMENTS TO APPLICANT ADJUSTED INCOME STATEMENT FOR THE TEST YEAR ENDED MARCH 31, 2019

		A	B STAFF	C STAFF	D STAFF	E STAFF	F STAFF	G STAFF	H STAFF	I STAFF	J STAFF	K STAFF
LINE		APPLICANT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT	ADJUSTMENT
NO.	DESCRIPTION	ADJUSTED	NO. 1	NO. 2	NO. 3	NO. 4	NO. 5	NO. 6	NO. 7	NO. 8	NO. 9	NO. 10
****	***********	******	******	******	******	******	******	******	******	******	******	******
	OPERATING REVENUES:											
1	GAS REVENUES	125,349,586										
2	COST OF GAS	(65,548,277)										
3	NET MARGIN	59,801,309	0	0	0	0	0	0	0	0	0	0
5	- The first of the second of t	27,001,207										
	OPERATING EXPENSES:											
4	NATURAL GAS PROD. & GATHERING	3,899										
5	OTHER GAS SUPPLY	687,191										
6	TRANSMISSION	47,121										
7	DISTRIBUTION	7,478,064								(297)		
8	CUSTOMER ACCOUNTS	1,664,433						(27,838)	(1,102)	(26)		
9	CUSTOMER SERVICE	145,534								(3,140)		
10	SALES	52,765								(988)		
11	ADMINISTRATIVE AND GENERAL	11,227,672	76,070		(202,065)	(559,029)				(5,154)	(74,772)	
12	TOTAL OPERATING EXPENSES	21,306,679	76,070	0	(202,065)	(559,029)	0	(27,838)	(1,102)	(9,605)	(74,772)	0
13	DEPRECIATION AND AMORTIZATION	14,558,833					(2,413,239)					
14	TAXES OTHER THAN INCOME TAXES	9,064,021		(49,345)			(=,::=,===,					(8,070)
15	INTEREST ON CUSTOMER DEPOSITS	22,919		(- , ,								(-,,
16	INCOME TAXES - CURRENT & DEFERRED	2,050,333										
17	TOTAL EXPENSES	47,002,785	76,070	(49,345)	(202,065)	(559,029)	(2,413,239)	(27,838)	(1,102)	(9,605)	(74,772)	(8,070)
18	OPERATING INCOME	12,798,524	(76,070)	49,345	202,065	559,029	2,413,239	27,838	1,102	9,605	74,772	8,070

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY SCHEDULE B-2 TOTAL KANSAS

STAFF ADJUSTMENTS TO APPLICANT ADJUSTED INCOME STATEMENT FOR THE TEST YEAR ENDED MARCH 31, 2019

		L STAFF	M STAFF	N STAFF	O STAFF	P STAFF	Q STAFF	R STAFF	S STAFF	T STAFF	U	V
LINE		ADJUSTMENT	TOTAL	STAFF								
NO.	DESCRIPTION	NO. 11	NO. 12	NO. 13	NO. 14	NO. 15	NO. 16	NO. 17	NO. 18	NO. 19	ADJUSTMENTS	ADJUSTED
****	*******	*******	********	******	*******	*******	*******	*******	********	*******	*******	******
	OPERATING REVENUES:											
1	GAS REVENUES							(465,957)	119,039		(346,918)	125,002,668
2	COST OF GAS										0	(65,548,277)
3	NET MARGIN	0	0	0	0	0	0	(465,957)	119,039	0	(346,918)	59,454,391
	OPERATING EXPENSES:											
4	NATURAL GAS PROD. & GATHERING										0	3,899
5	OTHER GAS SUPPLY										0	687,191
6	TRANSMISSION										0	47,121
7	DISTRIBUTION	(47,903)					72,256				24,056	7,502,120
8	CUSTOMER ACCOUNTS	(3,240)					8,312				(23,894)	1,640,539
9	CUSTOMER SERVICE	(186)									(3,326)	142,208
10	SALES	(385)									(1,373)	51,392
11	ADMINISTRATIVE AND GENERAL	(18,066)	58,298	(65,132)	(68,917)	4,658	8,424				(845,685)	10,381,987
12	TOTAL OPERATING EXPENSES	(69,780)	58,298	(65,132)	(68,917)	4,658	88,992	0	0	0	(850,222)	20,456,457
13	DEPRECIATION AND AMORTIZATION										(2,413,239)	12,145,594
14	TAXES OTHER THAN INCOME TAXES										(57,415)	9,006,606
15	INTEREST ON CUSTOMER DEPOSITS										0	22,919
16	INCOME TAXES - CURRENT & DEFERRED									732,173	732,173	2,782,506
17	TOTAL EXPENSES	(69,780)	58,298	(65,132)	(68,917)	4,658	88,992	0	0	732,173	(2,588,703)	44,414,082
18	OPERATING INCOME	69,780	(58,298)	65,132	68,917	(4,658)	(88,992)	(465,957)	119,039	(732,173)	2,241,785	15,040,309

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY TOTAL KANSAS SCHEDULE B-3

EXPLANATION OF STAFF ADJUSTMENTS TO OPERATIONS

FOR THE TEST YEAR ENDED MARCH 31, 2019

LINE NO. ***********************************	INCREASE/ (DECREASE) TO OPERATING INCOME
1 STAFF ADJUSTMENT NO. 1 (Luke Fry) 2 ADMINISTRATIVE AND GENERAL 3 Staff's adjustment to update payroll expense to the 12 months ending August 31, 2019.	(76,070)
4 STAFF ADJUSTMENT NO. 2 (Luke Fry) 5 TAXES OTHER THAN INCOME TAXES 6 Staff's adjustment to update payroll tax.	49,345
7 STAFF ADJUSTMENT NO. 3 (Luke Fry) 8 ADMINISTRATIVE AND GENERAL 9 Staff's adjustment to update benefits to the 12 months ending August 31, 2019.	202,065
10 STAFF ADJUSTMENT NO. 4 (Luke Fry) 11 ADMINISTRATIVE AND GENERAL 12 Staff's adjustment to remove incentive compensation based on earning per share.	559,029
13 STAFF ADJUSTMENT NO. 5 (Hutton) 14 DEPRECIATION AND AMORTIZATION 15 Staff's adjustment to update depreciation expense to reflect Staff's updated Plant balances and change in depreciation rates.	2,413,239
16 STAFF ADJUSTMENT NO. 6 (Hutton) 17 CUSTOMER ACCOUNTS 18 Staff's adjustment to update bad debt to August 31, 2019 and Staff's revenue amount.	27,838
19 <u>STAFF ADJUSTMENT NO. 7</u> (Hutton) 20 <u>CUSTOMER ACCOUNTS</u> 21 Staff's adjustment to update interest on customer deposits based on updated customer deposits.	1,102
22 STAFF ADJUSTMENT NO. 8 (Campbell) 23 DISTRIBUTION 24 CUSTOMER ACCOUNTS 25 CUSTOMER SERVICE 26 SALES 27 ADMINISTRATIVE AND GENERAL 28 Staff's adjustment to remove advertising expenses which are inappropriate for recovery.	297 26 3,140 988 5,154
29 <u>STAFF ADJUSTMENT NO. 9</u> (Campbell) 30 ADMINISTRATIVE AND GENERAL 31 Staff's adjustment to remove donations made which are inappropriate for recovery.	74,772

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY TOTAL KANSAS SCHEDULE B-3

EXPLANATION OF STAFF ADJUSTMENTS TO OPERATIONS

FOR THE TEST YEAR ENDED MARCH 31, 2019

LINE		INCREASE/ (DECREASE) TO OPERATING
NO.		INCOME
*****	**********************	*****
32	STAFF ADJUSTMENT NO. 10 (Campbell)	
33	TAXES OTHER THAN INCOME TAXES	8,070
34	Staff's adjustment to update Kansas Corporation Commission assessment fees to 12 months ending August 31, 2019.	
35	STAFF ADJUSTMENT NO. 11 (Campbell)	
36	DISTRIBUTION	47,903
37	CUSTOMER ACCOUNTS	3,240
38	CUSTOMER SERVICE	186
39	SALES	385
40	ADMINISTRATIVE AND GENERAL	18,066
41	Staff's adjustment to remove miscellanous expenses which are inappropriate for recovery.	
42	STAFF ADJUSTMENT NO. 12 (Campbell)	
43	ADMINISTRATIVE AND GENERAL	(58,298)
44	Staff's adjustment to include and update rate expense in the case.	` , ,
45	STAFF ADJUSTMENT NO. 13 (Baldry)	
46	ADMINISTRATIVE AND GENERAL	65,132
47	Staff's adjustment to reflect pension expenses for the 12 months ending August 31, 2019.	
48	STAFF ADJUSTMENT NO. 14 (Baldry)	
49	ADMINISTRATIVE AND GENERAL	68,917
50	Staff's adjustment to reflect other retirement benefit expenses for the 12 months ending August 31, 2019.	
51	STAFF ADJUSTMENT NO. 15 (Baldry)	
52	ADMINISTRATIVE AND GENERAL	(4,658)
53	Staff's adjustment to reflect the pension and post retirement tracker balance as of August 31, 2019 with estimated amounts through March 1, 202	0.
54	STAFF ADJUSTMENT NO. 16 (Baldry)	
55	DISTRIBUTION	(72,256)
56	CUSTOMER ACCOUNTS	(8,312)
57	ADMINISTRATIVE AND GENERAL	(8,424)
58	Staff's adjustment to update lease expense to 12 months ending August 31, 2019.	
59	STAFF ADJUSTMENT NO. 17 (Ellis)	
60	GAS REVENUES	(465,957)
61	Staff's adjustment to weather normalization.	
62	STAFF ADJUSTMENT NO. 18 (Ellis)	
63	GAS REVENUES	119,039
64	Staff's adjustment to customer annualization.	
65	STAFF ADJUSTMENT NO. 19 (Luke Fry)	
66	INCOME TAXES - CURRENT & DEFERRED	(732,173)
67	Staff's adjustment to reflect the income tax effect of Staff's adjustments.	

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY TOTAL KANSAS SCHEDULE B-4

STAFF ADJUSTED AND PRO FORMA CALCULATION OF TAXABLE INCOME FOR THE TEST YEAR ENDED MARCH 31, 2019

		A APPLICATN	B APPLICANT	С	D STAFF TEST	Е	F STAFF PRO	G
LINE		JURISDICTIONAL	TEST YEAR	APPLICANT	YEAR	STAFF	FORMA	STAFF PRO
NO.	DESCRIPTION	PER BOOKS	ADJUSTMENTS	ADJUSTED	ADJUSTMENTS	ADJUSTED	ADJUSTMENTS	FORMA
****	**********	******	******	*****	*****	******	*****	*****
1	OPED ATING INCOME DEPODE INCOME TAYES	10.255.250	(4.406.402)	14 040 057	2 072 059	17 922 915	2 (07 (55	20.520.470
1	OPERATING INCOME BEFORE INCOME TAXES	19,255,350	(4,406,493)	14,848,857	2,973,958	17,822,815	2,697,655	20,520,470
	INCREASE (DECREASE) TO OPERATING INCOME BEFORE INCOME TAXES:							
2	INTEREST ON DEBT	(4,223,550)	(308,921)	(4,532,471)	(73,877)	(4,606,348)	0	(4,606,348)
-	TITELEST CITEDET	(1,220,000)	(500,721)	(1,002,171)	(15,011)	(1,000,010)		(1,000,010)
3	TAXABLE INCOME	15,031,800	(4,715,414)	10,316,386	2,900,081	13,216,467	2,697,655	15,914,122
4	KANSAS TAX RATE	7.00%	7.00%	7.00%	7.00%	7.00%	7.00%	7.00%
5	KANSAS INCOME TAX	1,052,226	(330,079)	722,147	203,006	925,153	188,836	1,113,989
6	ADJUSTMENTS	0	0	0	0	0	0	0
7	KS. INCOME TAX - CURRENT	1,052,226	(330,079)	722,147	203,006	925,153	188,836	1,113,989
8	TAXABLE FEDERAL INCOME	13,979,574	(4,385,335)	9,594,239	2,697,075	12,291,314	2,508,819	14,800,133
9	FEDERAL TAX RATE	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%	21.00%
10	FEDERAL INCOME TAX	2,935,711	(920,920)	2,014,790	566,386	2,581,176	526,852	3,108,028
11	ADJUSTMENTS	0	0	0	0	0	0	0
12	FED. INCOME TAX - CURRENT	2,935,711	(920,920)	2,014,790	566,386	2,581,176	526,852	3,108,028
	SUMMARY OF INCOME TAXES - CURRENT:							
13	DEFERRED INCOME TAX	0	0	0	(20,811)	(20,811)	0	(20,811)
14	FLOWBACK OF EXCESS ADIT	(686,604)	0	(686,604)	(16,408)	(703,012)	0	(703,012)
15	AMORTIZATION OF ITC	0	0	0	0	0	0	0
16	KS. INCOME TAX - CURRENT	1,052,226	(330,079)	722,147	203,006	925,153	188,836	1,113,989
17	FED. INCOME TAX - CURRENT	2,935,711	(920,920)	2,014,790	566,386	2,581,176	526,852	3,108,028
18	TOTAL INCOME TAXES - CURRENT & DEF.	3,301,333	(1,250,999)	2,050,333	732,173	2,782,506	715,688	3,498,194

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY SCHEDULE B-4-1

TOTAL KANSAS INTEREST CALCULATION FOR THE TEST YEAR ENDED MARCH 31, 2019

LINE NO. *****	DESCRIPTION ************************************	STAFF ADJUSTED ******	STAFF PRO FORMA ******
1	RATE BASE	242,482,567	242,482,567
2	WEIGHTED COST OF DEBT (SCH C-1)	1.900%	1.900%
3	INTEREST EXPENSE	4,606,348	4,606,348

TOTAL KANSAS CAPITAL STRUCTURE FOR THE TEST YEAR ENDED MARCH 31, 2019

	A	В	C	D	Е	F	G
				STAFF			
		COMPANY		ADJUSTED			
	TOTAL	ADJUSTED	STAFF	KANSAS GAS	CAPITALIZATION	COST OF	WEIGHTED COST
DESCRIPTION	COMPANY	BALANCE	ADJUSTMENTS	JURISDICTIONAL	RATIOS	CAPITAL	OF CAPITAL
*******	* * * * * * * *	* * * * * * * *	* * * * * * * * * *	*******	******	* * * * * *	*****
LONG TERM DEBT	3,653,712,711	3,653,712,711	792,716,743	4,446,429,454	43.68%	4.35%	1.90%
EQUITY	5,508,101,667	5,508,101,667	224,223,431	5,732,325,098	56.32%	9.10%	5.12%
_							
TOTAL	9,161,814,378	9,161,814,378	1,016,940,174	10,178,754,552	100.00%		7.02%
	**************************************	DESCRIPTION COMPANY ************************************	DESCRIPTION COMPANY ADJUSTED BALANCE ************************************	DESCRIPTION TOTAL COMPANY ADJUSTED BALANCE ************************************	DESCRIPTION COMPANY ADJUSTED STAFF ADJUSTED KANSAS GAS ADJUSTMENTS LONG TERM DEBT 3,653,712,711 3,653,712,711 3,653,712,711 792,716,743 4,446,429,454 EQUITY 5,508,101,667 5,508,101,667 224,223,431 5,732,325,098	COMPANY	COMPANY ADJUSTED STAFF ADJUSTED KANSAS GAS CAPITALIZATION COST OF

4 TOTAL WEIGHTED COST OF LT DEBT

1.89966%

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY SCHEDULE C-2

TOTAL KANSAS ADJUSTMENTS TO CAPITAL STRUCTURE FOR THE TEST YEAR ENDED MARCH 31, 2019

	A	В	C	D
				STAFF
	COMPANY	STAFF		ADJUSTED
LINE	ADJUSTED	ADJUSTMENT	TOTAL STAFF	KANSAS GAS
NO. DESCRIPTION	BALANCE	NO. 1	ADJUSTMENTS	JURISDICTIONAL
*** *******	* *******	******	******	*****
1 LONG TERM DE	BT 3,653,712,711	792,716,743	792,716,743	4,446,429,454
2 EQUITY	5,508,101,667	224,223,431	224,223,431	5,732,325,098
3 TOTAL	9,161,814,378	1,016,940,174	1,016,940,174	10,178,754,552

DOCKET NO. 19-ATMG-525-RTS ATMOS ENERGY SCHEDULE C-3 TOTAL KANSAS

EXPLANATION OF STAFF ADJUSTMENTS TO CAPITAL STRUCTURE FOR THE TEST YEAR ENDED MARCH 31, 2019

INCREASE / (DECREASE)

LINE TO CAPITAL STRUCTURE NO. STAFF ADJUSTMENT NO. 1 (Gatewood)

LONG TERM DEBT 792,716,743 COMMON EQUITY 224,223,431

To revise capital structure to reflect changes as of October 2019

CERTIFICATE OF SERVICE

19-ATMG-525-RTS

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing was served via electronic service this 18th day of November, 2019, to the following:

JAMES G. FLAHERTY, ATTORNEY ANDERSON & BYRD, L.L.P. 216 S HICKORY PO BOX 17 OTTAWA, KS 66067 Fax: 785-242-1279 iflaherty@andersonbyrd.com

JARED GEIGER, SR RATE ANALYST ATMOS ENERGY CORPORATION 1555 BLAKE ST STE 400 DENVER, CO 80202 jared.geiger@atmosenergy.com

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Fax: 785-271-3116
t.love@curb.kansas.gov

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Fax: 785-271-3116
s.rabb@curb.kansas.gov

PHOENIX ANSHUTZ, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3354 p.anshutz@kcc.ks.gov SHELLY M BASS, SENIOR ATTORNEY ATMOS ENERGY CORPORATION 5430 LBJ FREEWAY 1800 THREE LINCOLN CENTRE DALLAS, TX 75240 shelly.bass@atmosenergy.com

JOSEPH R. ASTRAB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
Fax: 785-271-3116
j.astrab@curb.kansas.gov
Hand Delivered

DAVID W. NICKEL, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3116 d.nickel@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Fax: 785-271-3116
d.smith@curb.kansas.gov

COLE BAILEY, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3354 c.bailey@kcc.ks.gov

CERTIFICATE OF SERVICE

19-ATMG-525-RTS

BRIAN G. FEDOTIN, GENERAL COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3354 b.fedotin@kcc.ks.gov

JAMES H JEFFRIES IV, PARTNER MCGUIREWOODS LLP 201 NORTH TRYON STREET SUITE 3000 CHARLOTTE, NC 28202-2146 jjeffries@mcguirewoods.com ROBERT VINCENT, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3354 r.vincent@kcc.ks.gov

/s/ Vicki Jacobsen

Vicki Jacobsen