

Missouri Public Service Commission

FILED**APR 11 2011****Missouri Public
Service Commission**Respond Data Request

Data Request No.	0101.1
Company Name	Atmos Energy Corporation-Investor(Gas)
Case/Tracking No.	GR-2008-0364
Date Requested	8/11/2009
Issue	Expense - Operations - Gas Supply Planning/Reliability
Requested From	Judy Dunlap
Requested By	Derick Miles
Brief Description	See attached data request.
Description	See attached data request.
Response	See attachments.
Objections	NA

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission if, during the pendency of Case No. GR-2008-0364 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Atmos Energy Corporation-Investor(Gas) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Atmos Energy Corporation-Investor (Gas) and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Highly Confidential
Rationale :	Reponse contains gas pricing information.

Staff Exhibit No. 11
 Date 3/23/11 Reporter JMB
 File No. GR-2008-0364

HIGHLY CONFIDENTIAL

Atmos Energy 2007/2008 ACA
GR-2008-0364
DR101.1 (Addendum)

HIGHLY CONFIDENTIAL

Atmos' primary receipt point capacity for the Hannibal/Canton/Palmyra area (on Panhandle Eastern Pipe Line) is contracted almost entirely at the Production/Market interface (or Haven). For contracts EFT 11671 and EFT 14089, all of the primary receipt point capacity is at Haven. For contract EFT 11598, the primary receipt point capacity is eleven miles west of Haven at the KCP&L (point KPOWR) interconnect (in Reno County, Kansas). For the Bowling Green area, the SCT 11474 contract has the primary receipt point located at Haven. For the Butler area, the SCT 11867 contract has Kearney County (Kansas) and Grant County (Texas) as the primary receipt point locations, which are 235 miles and 187 miles westward (upstream) of Haven, respectively.

Please explain the following:

- 1) The appropriateness of the location of the primary receipt points as it relates to system supply reliability.
- 2) The impact of a Force Majeure, an Operation Flow Order, or other supply cuts further up-stream (west) of Haven (in the production zone) for these primary receipt points.
- 3) How the primary receipt point location impacts gas supply contracts set up for each of these respective areas.
- 4) What is the impact on gas supply reliability for primary receipt points located at Haven?
- 5) What is the financial impact on gas supply for primary receipt points located at Haven? Provide the calculations and the worksheet(s) in fully functioning Excel spreadsheets, including source data and output data.
- 6) Please explain any Atmos financial considerations for setting the receipt points. Provide the calculations and the worksheet(s) in fully functioning Excel spreadsheets, including source data and output data.

EXHIBIT NO. _____
FILE NO. _____
DATE _____

Missouri Public Service Commission/ Data Request
Company Name Atmos Energy Corporation-Investor (Gas)
Case/Tracking No.: GR- 2008-0364

Data Request No. 0101.1
Company Name Atmos Energy Corporation-Investor (Gas)
Case/Tracking No. GR-2008-0364
Date Requested 08/11/2009
Issue Expense - Operations - Gas Supply Planning/Reliability
Requested From Judy Dunlap
Requested By Derick Miles
Brief Description See attached Data Request

Description See attached Data Request

Due Date 8/31/2009

Response:

For clarification of the general comments by Staff in the attached data request, all receipt points for EFT contracts 14089 and 11598 are located in Reno County, Kansas. For summer months April – October, gas is purchased and injected into storage; all charges are Field Zone related. For winter months November – March, gas is transported from storage to Hannibal/Canton/Palmyra; all charges are Market Zone related. For the Butler area, both receipt points are in Kansas – Kearney and Grant County.

Panhandle Eastern requires a notice of one year for contract renewals. The last notices occurred 3/31/06 and 3/31/07, which preceded the ACA period in question. The next renewal dates will be 3/31/2014 with contract expiration dates of 3/31/2015.

- 1) Both Field Zone (West of Haven) and Market Zone (Haven) receipt points are reliable locations for supply, although the Field Zone is becoming the receipt point of choice by suppliers. After the unbundling occurred in the early 1990s, Panhandle Eastern Pipeline thought suppliers would prefer the Haven Pool over the Field Zone but the past few years have shown that suppliers have more liquidity in the Field Zone. Atmos is currently looking into the possibility of moving the Haven receipt points to the Field Zone.
- 2) The impact of a Force Majeure, an OFO, or other supply cuts in the Field Zone would affect the gas transported through the Field Zone to delivery point only, and not gas transported from Haven to delivery point since it is further downstream of the Force Majeure event.
- 3) Please see #4 and #5. Also, the Hannibal and Butler bids can be compared, showing the difference between supplier bidding for Haven versus Field. The supplier bids have been provided to Staff during this ACA review.
- 4) The impact on gas supply reliability for receipt points located at Haven versus receipt points located at the Field Zone is that there are fewer bids from suppliers. As mentioned in #1, the Haven receipt point is just as reliable as the Field Zone.

- 5) The financial impact on gas supply for receipt points located at Haven, as compared to having receipt points located at the Field Zone, are less reservation rates, commodity rates, and fuel % deductions but a higher premium from suppliers. If the receipt points were moved from Haven to the Field Zone, there would be additional charges from the pipeline but a lower premium or discount from suppliers. The current rates for the Field Zone are \$4.73 monthly reservation rate, \$.1767 commodity rate, and 0.83% fuel rate. Please see the excel attachment as an example..
- 6) Any Atmos financial considerations for setting the receipt points were originated prior to May 1993, when the contracts were executed. Such information is not available today. Please refer to #5.

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. GR-2008-0364 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Atmos Energy Corporation-Investor(Gas) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Atmos Energy Corporation-Investor(Gas) and its employees, contractors, agents or others employed by or acting in its behalf..

Security	Highly Confidential
Rationale	Data request contains material that is highly confidential

Responded by: M. Walker