



RAILROAD COMMISSION OF TEXAS

HEARINGS DIVISION

GUD No. 10295

**RENEWAL OF ATMOS PIPELINE-TEXAS RIDER REV
SEVERED FROM GUD. 10293**

APPEARANCES

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PROPOSAL FOR DECISION**PROCEDURAL HISTORY:**

Docket Established:	August 26, 2013
Final Hearing Dates:	October 29, 2013
Heard By:	Randall Collins, Hearings Examiner Christina Poole, Technical Examiner
Record Closed:	November 12, 2013
PFD Circulation:	December 2, 2013

STATEMENT OF THE CASE

In this proceeding the Commission is considering the renewal, extension, and/or modification to the Rider Rev established in the Final Order of GUD 10000. In that preceding the Commission decided that the Rider Rev tariff would be implemented on a trial basis for three years. At the end of the three year trial period, the Commission provided that the Rider Rev would expire unless the Commission determined it should be renewed based on the results of the trial period. Atmos Pipeline – Texas (APT) and Staff support the renewal and extension of the current Rider Rev and recommend or are agreeable to some modifications. Atmos Texas Municipalities (“ATM”) and Atmos Cities Steering Committee (“ACSC”) oppose the renewal or in the alternative modification of the existing Rider Rev tariff. Renewal of the Rider Rev tariff is justified if the Commission as set forth in GUD 10000, Findings of Fact (FOF) No. 112, determines the Rider Rev is achieving its stated goal. Additionally, based on the review of the results of the trial period the Commission must determine if the Rider Rev tariff is extended, then for how long the Rider Rev should extended and or continued.

The Rider REV tariff at issue is an adjustment mechanism established and approved in GUD No. 10000. The Rider Rev tariff is used to adjust Rate CGS and Rate PT annually each November 1st for 75% of the increase or decrease in the amount recorded by APT as Other Revenue. The remaining 25% of the increase or decrease is retained by APT as an incentive to compete for Other Revenue. Rate CGS and Rate PT are adjusted using the same allocation percentage determined on Schedule J in GUD10000. The rate is then determined by the current Maximum Dailey Quantities (MDQ) for each class. This rate is then used to adjust the Rate CGS and Rate PT capacity charge accordingly. The concept of the Rider Rev that originated in GUD 10000 was as a mechanism by which regulated customers could benefit from a share of the revenues flowing from the non-regulated customers.¹

¹ (TR., page 75, lines 1-6).

The Rider Rev as approved in GUD 10000 allows for increases or decreases in Other Revenue since the amount of the Other Revenue is used to credit or reduce the Cost of Service (COS) for service to the regulated class of customers between full statement of intent rate cases.

The Rider Rev has been applied to three annual filings since GUD 10000, GUD No. 10099, 10202, and 10293. Following each of the filings the Commission staff reviewed the supporting documentation and conducted audits of the FERC accounts which made up the Other Revenue. After completing its review, the Commission staff determined the Rider Rev tariff and adjusted the Rate CGS and Rate PT customers' capacity charge for the decrease or increase in Other Revenue above or below the base threshold of \$83,723,392.

The criteria to be used in reviewing the Rider Rev for continuation were set out in the Proposal for Decision in GUD 10000, when it stated:

At the end of the three-year trial period, APT can request an additional three-years with their the third-year filing and provide documentation why it should be continued for another three-year period. That documentation would show: 1) how the Rate CGS and PT customers have benefits from the use of Rider Rev, 2) Customers gained or lost, 3) Volumes and revenues for each of the three periods, 4) Customers shifted from Rate PT to Other Revenue and Other Revenue to PT.²

APT in its Rider Rev renewal request filing set out the documentation to address the continuation of the Rider Rev. Additionally, APT stated that continued volatility or revenues received from Other Revenue customers ranged from \$88.8 million to \$75.9 million during the three year River Rev period. The absence of the Rider Rev ATP claims that a revenue shortfall in year three of the initial three year Rider Rev period of \$7.8 million coupled with the expectation of continued lower prices for transportation services would trigger consideration of a general rate case filing. APT asserts in its Rider Rev renewal request that renewal of the Rider Rev will eliminate the need to file a general rate case until the filing is required by the GRIP statute unless something unforeseen occurs.³ In addressing the first requirement in the showings needed for a three year continuation of the Rider Rev, ATP argues that a benefit to the CGS and PT customers is the savings received by not incurring the expenses in a rate case proceeding. Additionally, ATP's position that Rate CGS and Rate PT customers experienced a net rate reduction of \$1.0 million through the end of the second year of the initial Rider Rev as support for the benefits received by the Rate PT and Rate CGS customers.⁴

² PFD, GUD 10000, p. 87.

³ ATP RIDER REV TRANSMITTAL LETTER, p. 3.

⁴ ATP RIDER REV TRANSMITTAL LETTER, p. 3.

In addressing the second, third and fourth requirements for requesting an extension of the Rider Rev, ATP attached five exhibits to its Request for Renewal in graph format showing the following:

- 1) Revenue from Other Revenue Customers- Attached hereto as **Exhibit No. 1**
- 2) Other Revenue volumes in BCF/YR (July 2010-June 2013)- Attached hereto as **Exhibit No. 2**
- 3) Customers moving from Other Revenue to Rate PT with Annual Volumes and Revenues- Attached hereto as **Exhibit No. 3**
- 4) Number of Customers Gained or Lost by Rate Class- Attached hereto as **Exhibit No. 4**
- 5) Annual Volumes and Revenues during the Rider Rev Period and in the Final Order in GUD 10000- Attached hereto as **Exhibit No. 5**

Table 1 below shows ATP's Other Revenue increases in GUD 10099 and decreases in GUD 10202 and 10293.

Table 1⁵

	GUD No. 1000	GUD No. 10099	GUD No. 10202	GUD No. 10293
Other Revenue – GUD No. 10000	\$83,723,392	\$83,723,392	\$83,722,392	\$83,722,392
Other Revenue	\$83,723,392	\$88,799,640	\$80,022,308	\$75,926,413
Difference	\$0	\$(5,079,248)	\$3,701,084	\$7,796,979
75%		x 0.75	x 0.75	x 0.75
Adjustment		\$(3,807,186)	\$2,775,813	\$5,847,734

⁵ Examiner Ex. 1, TR., p. 18.

The increase or decrease in Other Revenue shown in Table 1 is applied by allocating to the customer classes, using the Maximum Daily Quantity to arrive at the capacity charge as shown in Table 2.

Table 2⁶

	GUD No. 10099		GUD No. 10202		GUD No. 10293	
	Rat CGS	Rate PT	Rate CGS	Rate PT	Rate CGS	Rate PT
Allocation %	0.97103	0.02897	0.97103	0.02897	0.97103	0.02897
Adjustment Allocated	\$3,696,891	\$110,296	\$2,695,397	\$ 80,416	\$5,678,323	\$169,411
MDQ	2,539,797	113,369	2,548,844	135,256	2,555,534	152,841
Adjustment 12 Months	\$ (1.4556) ÷ 12	\$ (0.9729) ÷ 12	\$ 1.0575 ÷ 12	\$ 0.5945 ÷ 12	\$2.2220 ÷ 12	\$ 1.1084 ÷ 12
Capacity Charge Adjustment	\$ (0.1213)	\$ (0.0811)	\$ 0.0881	\$ 0.0495	\$ 0.1852	\$ 0.0924

As reflected in Table 2, in year one there was a reduction in the rate because of a reported increase in Other Revenue while in years two and three Other Revenue was less than the base threshold established in GUD 10000 and therefore resulted in a rate adjustment increase to Rate CGS and Rate PT.

As part of this proceeding, the Commission has reviewed not only the issue of continuing the Rider Rev if it has been performing its intended purpose, but whether the Rider Rev if renewed should be modified and/or extended.

The following documents are attached to this Proposal for Decision:

- Revenue from Other Revenue Customers- Attached hereto as **Exhibit No. 1**
- Other Revenue volumes in BCF/YR (July 2010-June 2013)- Attached hereto as **Exhibit No. 2**
- Customers moving from Other Revenue to Rate PT with Annual Volumes and Revenues- Attached hereto as **Exhibit No. 3**
- Number of Customers Gained or Lost by Rate Class- Attached hereto as **Exhibit No. 4**
- Annual Volumes and Revenues during the Rider Rev Period and in the Final Order in GUD 10000- Attached hereto as **Exhibit No. 5**
- Rider Rev tariff- Attached hereto as **Exhibit No. 6**

⁶ Examiner Ex. 2, TR., p. 18.

1. Procedural History

On August 9, 2013, Atmos Pipeline – Texas filed a Request *for Renewal of the Rider Rev tariff* with the Railroad Commission of Texas (Commission). The case was docketed as GUD No. 101295.

The following entities intervened in this proceeding: The Atmos Cities' Steering Committee (“**ACSC**”) representing Abilene, Addison, Allen, Alvarado, Angus, Anna, Argyle, Arlington, Bedford, Bellmead, Benbrook, Beverly Hills, Blossom, Blue Ridge, Bowie, Boyd, Bridgeport, Brownwood, Buffalo, Burkburnett, Burleson, Caddo Mills, Carrollton, Cedar Hill, Celeste, Celina, Cisco, Cleburne, Clyde, College Station, Colleyville, Colorado City, Comanche, Coolidge, Coppell, Corinth, Corral City, Crandall, Crowley, Dalworthington Gardens, Denison, DeSoto, Duncanville, Eastland, Edgecliff Village, Emory, Ennis, Eules, Everman, Fairview, Farmers Branch, Farmersville, Fate, Flower Mound, Forest Hill, Fort Worth, Frisco, Frost, Gainesville, Garrett, Garland, Grand Prairie, Grapevine, Haltom City, Harker Heights, Haslet, Hewitt, Highland Park, Highland Village, Honey Grove, Hurst, Iowa Park, Irving, Justin, Kaufman, Keene, Keller, Kemp, Kennedale, Kerrville, Killeen, Krum, Lakeside, Lake Worth, Lancaster, Lewisville, Lincoln Park, Little Elm, Lorena, Madisonville, Malakoff, Mansfield, McKinney, Melissa, Mesquite, Midlothian, Murphy, Nacona, North Richland Hills, Northlake, Oak Leaf, Ovilla, Palestine, Pantego, Paris, Parker, Pecan Hill, Plano, Ponder, Pottsboro, Prosper, Quitman, Reno (Parker County), Red Oak, Richardson, Richland, Richland Hills, River Oaks, Roanoke, Robinson, Rockwall, Roscoe, Rowlett, Royce City, Sachse, Saginaw, Seagoville, Sherman, Snyder, Southlake, Springtown, Stamford, Stephenville, Sulphur Springs, Sweetwater, Temple, Terrell, The Colony, Tyler, University Park, Venus, Vernon, Waco, Watauga, Waxahachie, Westlake, Whitesboro, White Settlement, Wichita Falls, Woodway, and Wylie; the Atmos Texas Municipalities (“**ATM**”) representing Austin, Balch Springs, Bandera, Barlett, Belton, Blooming Grove, Bryan, Cameron, Cedar Park, Clifton, Commerce, Copperas, Cove, Corsicana, Denton, Electra, Fredericksburg, Gatesville, Georgetown, Goldwaite, Granbury, Greenville, Groesbeck, Hamilton, Henrietta, Hickory Creek, Hico, Hillsboro, Hutto, Kerens, Lampass, Leander, Lometa, Longview, Mart, Mexia, Olney, Pflugerville, Ranger, Rice, Riesel, Rogers, Roundrock, San Angelo, Sanger, Somerville, Star Harbor, Trinidad, Trophy Club, Whitney; and Staff of the Railroad Commission (“**Staff**”).

The hearing in this matter was conducted on October 29, 2013. The following individuals testified on behalf of ATP: Charles R. Yarbrough II, Vice President of Rates and Regulatory Affairs and Dennis L. Gordon, Vice President Pipeline Marketing. The following individual testified on behalf of ACSC, Karl J. Nalepa, President ReSolved Energy Consulting, LLC.

2. Jurisdiction

The Commission has jurisdiction over Atmos Pipeline – Texas and over the matters at issue in this proceeding pursuant to *TEX. UTIL. CODE ANN.* §§ 102.001, 103.003, 103.051, 104.001, 121.051, 121.052, and 121.151 (Vernon 2013). The statutes and rules involved in this proceeding include, but are not limited to *TEX. UTIL. CODE ANN.* §§ 104.101, 104.102, 104.103, 104.105, 104.106, 104.107, 104.110, 104.301, and 16 *TEX. ADMIN. CODE* Chapter 7. Additionally, the jurisdiction and scope of the hearing in this matter is limited to the authority set forth in the Final Order in GUD No. 10000, specifically FOF 112 specifically “to determine if the Rider Rev is achieving its stated goal”.

3. Atmos Pipeline – Texas

Atmos Energy Corporation is engaged in the regulated natural gas distribution, transmission and storage businesses, as well as other non-regulated natural gas businesses.

Atmos Pipeline – Texas is an unincorporated division of Atmos Energy Corporation and is an intrastate natural gas transmission pipeline operating solely in Texas. Atmos Pipeline – Texas operates a large intrastate pipeline consisting of approximately 6,000 miles of transmission pipeline, approximately 700 city gate meters, five underground storage facilities, and forty-one (41) gas compressor stations. The geographical areas served by this pipeline division spans from the area bounded by the Oklahoma border; the Katy hub near Houston; the Carthage hub in East Texas; the Waha hub in West Texas; and the Austin/Hill Country area.

4. Rider REV – Overview and Procedural History

The Rider Rev has been applied to three annual filings since GUD 10000, GUD 10099, 10202, and 10293. Following each of the filings the Commission reviewed the supporting documentation and conducted audits of the FERC accounts which made up the Other Revenue.

Table 3 below shows the Earnings Monitoring Reports (ERM) from the Interim Rate Adjustment (IRA) filings and the earnings monitoring report that was provided in the third Rider Rev filing, GUD 10293 and shown in table 3 below, the rate of return for ATP greater than the 9.362% authorized on GUD 10000.

Table 3⁷

	GUD 10078	GUD 10144	GUD 10240	GUD 10293
Actual Rate of Return	8.611%	9.280%	9.814%	10.716%

⁷ Examiner Ex. 3 TR., p. 18.

There was no evidence presented in either the testimony of in the review of the Rider Rev tariff or the Findings of Fact from GUD No. 10000 that would support a finding or conclusion that the intended purpose of the Rider Rev was to do anything other than to adjust the Rate CGS and Rate PT. Despite the revenue increase regulated customers in the most recent Rider Rev filing, the benefit to regulated customers in Rider Rev's first year of operation provided a net benefit through the first two years of its application.⁸

5. ACSC and ATM's opposition

Both ACSC and ATM oppose the continuation of the Rider Rev, but in the alternative proposed modifications to the Rider Rev. ACSC witness Karl J. Nalepa counters the argument that "but for" the Rider Rev APT would seek a rate case. Mr. Nalepa testified that since 2010, APT's net income has grown by almost \$10 million a year, from \$41.5 million in 2010 to \$70.6 million by June 30, 2013. Furthermore, since the lack of a rate case and the savings of expenses associated with such a filing would not have occurred, there has been no benefit to the rate payers with the adoption of the Rider Rev in GUD 10000.⁹

ATM in its opposition to renewal the Rider Rev cited the testimony of Karl J. Nalepa that APT's application to renew the Rider Rev tariff does not present basic information that is required to conduct a comprehensive review of APT's overall revenues, expenses, invested capital, or to determine a reasonable return.¹⁰

Both ACSC and ATM complain that a failure of the Rider Rev allows APT to double-recover from customers that shift from Other Revenue to Rate PT. If a customer moves from Other revenues to Rate PT, APT benefits because the revenues from that customer would be reflected as a reduction in Other Revenues (thereby reducing the "Other Revenues" credit to regulated ratepayers), while APT also collects a tariff rate from the now-regulated customer. Mr. Nalepa testified that the double-counting was unfair and would provide APT an opportunity to collect revenue twice from a customer that shifted from Other Revenue class to the Rate PT class.¹¹ The evidence present by APT supports that less than .5% of the total three-year revenue from the Other Revenue segment was due to customers moving from the competitive market to Rate PT.¹² While the examiners feel this inequity should be resolved, without supporting information and evidence on how to achieve this issue and how such a mechanism would have affected the Rider Rev during the three year test period, no resolution has been proposed at this time.

⁸ Rebuttal Testimony of Yarbrough, APT Ex 5 at 9.

⁹ Redacted Direct Testimony of Karl J. Nalepa at 11, Table 2, and Attachment K.

¹⁰ Redacted Direct Testimony of Karl J. Nalepa at 10 and Attachment H.

¹¹ Redacted Direct Testimony of Karl J. Nalepa at 28.

¹² Rebuttal Testimony of Charles R. Yarbrough, APT Ex. 5 at 10.

6. APT's support for the renewal

APT supports the renewal and extension of the Rider Rev with one modification. The modification unopposed by APT applies to updated filings of Maximum Dailey Quantities ("MDQs") for Rate CGS and Rate PT customers and is reflected below in the recommended modifications. APT proposes the Rider Rev be extended to allow the Rider Rev to be effective up through the effective dates of any new rates as the result of the next rate case filing. APT's evidence supports the renewal of the Rider Rev by showing the rate payers benefitted from the current Rider Rev tariff. During the first annual period which included billing through October 2012, customers paid \$3,807,186 less than they would have without the Rider Rev.¹³ Moreover, while those same customers' rates were adjusted upwards by \$2, 277,813 in the second annual period, customers still paid \$1,031,373 less during the first two years of the Rider Rev than they would have paid without it.¹⁴

7. Rider REV – Modifications

A. In the Rider Rev tariff, page 16 number 3, language is used that states APT as part of the adjustment review process must file with the Commission the "then current MDQ for each class (CGS and PT)". The tariff fails to define "current" and fails to require that the MDQs be updated annually prior to filing. Maximum Dailey Quantities ("MDQs") for each customer annually by providing a schedule showing the prior year's MDQs by customer and the current year's MDQs by customer as part of the Rider Rev filing, thus allowing a more accurate allocation portion.

B. In GUD 10000, Finding of Fact 120 states that it is "reasonable that if the change in rates under the Rider Rev generates an increase in revenue of more than 2 ½% then a hearing shall be held." Neither GUD 10000 nor the tariff elaborates on the "hearing" or the process of a hearing. In order to ensure that procedural due process to affected persons as defined in TEX. UTIL. CODE ANN. § 101.003 (Vernon 2012) § 101.003 "Affected person" or its representatives, should have the standing to receive a copy of all documents supporting a greater than 2 ½% cost of service increase at the time it is filed with the Commission and be able to file a reply within 20 days. If the parties representing the affected person oppose the increase, a hearing request shall be filed with Docket Services at the same time any reply is filed and such hearing will be docketed and heard by the Hearings Division of the Commission. Such hearing will be limited in scope to the sole issue of the reasonableness of any increase greater than 2 ½% of ATP's cost of service increase.

¹³ Note Direct testimony of Charles R. Yarbrough, APT Ex. 3 at 9; Rebuttal Testimony of Charles R. Yarbrough, APT Ex. 5 at 10.

¹⁴ Note Direct testimony of Charles R. Yarbrough, APT Ex. 3 at 9; Rebuttal Testimony of Charles R. Yarbrough, APT Ex. 5 at 10.

8. Rider REV – Extension

It is without dispute that general rate case proceedings are expensive. The parties in this proceeding where parties in GUD 10000 where the approved expenses totaled \$4,199,136.88. For this reason extending the Rider Rev tariff through the period of time for ATP to file its next rate case is logical compared to the rate case expenses to be incurred for a proceeding that would be limited in duration. The Rider Rev as modified should be renewed to coincide with the next statement of intent filed by ATP. This extension will allow the Rider Rev to be effective up through the effective dates of any new rates. Therefore, the Rider Rev as modified should be filed in August of 2014, 2015 and 2016 with an effective date of November 1st. If ATP elects to file a rate case prior to January 22, 2017, the Rider Rev tariff will expire upon the effective date of the new rates.

In all other respects the Examiners recommend renewal, modification, and extension of the Rider Rev tariff.

Respectfully submitted,



Randall D. Collins
Hearings Examiner
Hearings Division



Christina Poole
Technical Examiner
Hearings Division

**Revenue From Other Revenue Customers
July 2010 - June 2013
(in millions)**

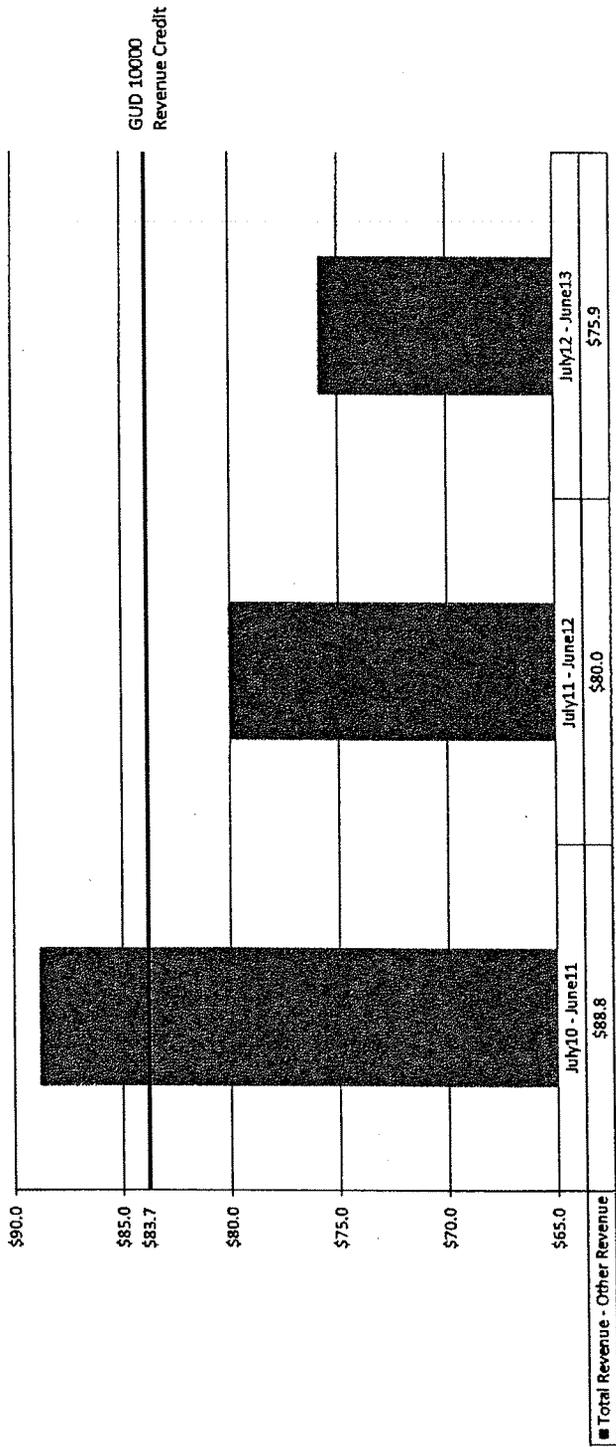
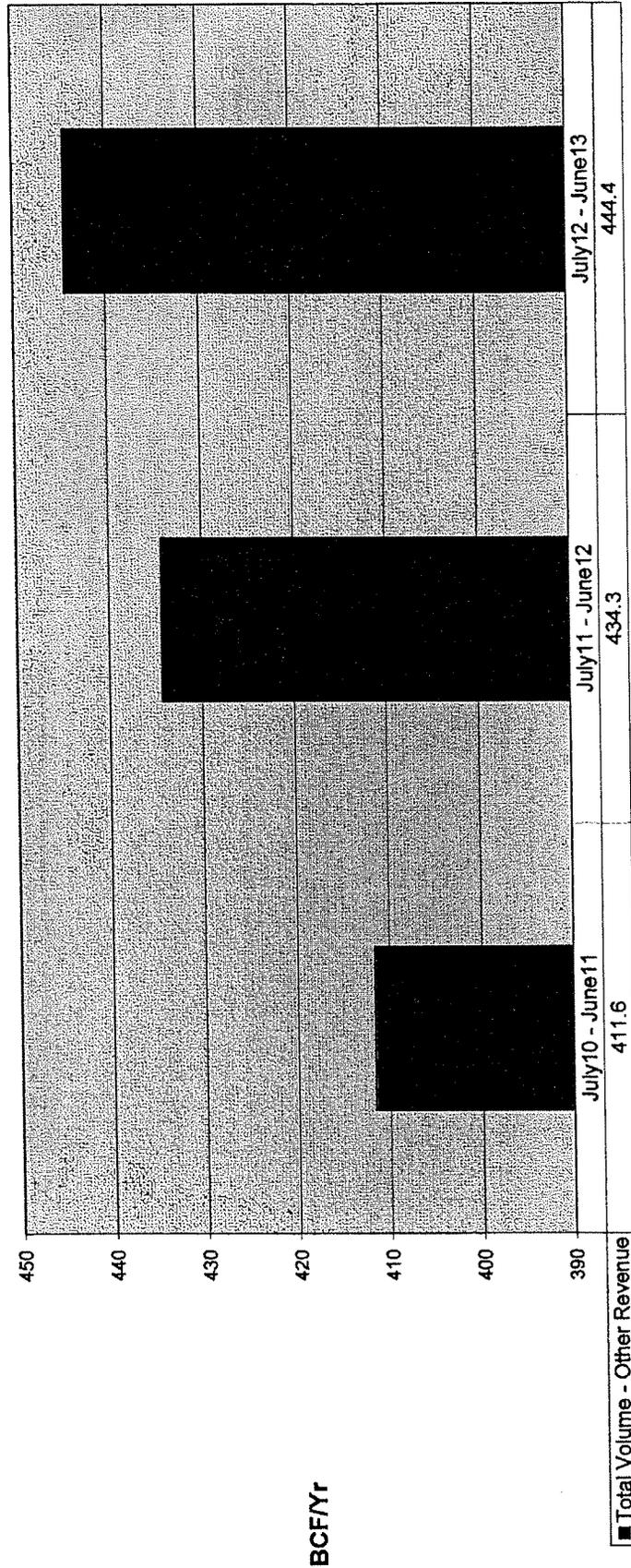


Exhibit 1

**Atmos Pipeline - Texas
Other Revenue Volumes In BCF/YR
Annual Periods July '10 - June '13**



■ Total Volume - Other Revenue

Total does not include volumes from competitive industrial customers

EXHIBIT C - Customers shifting from Other Revenue to Rate PT

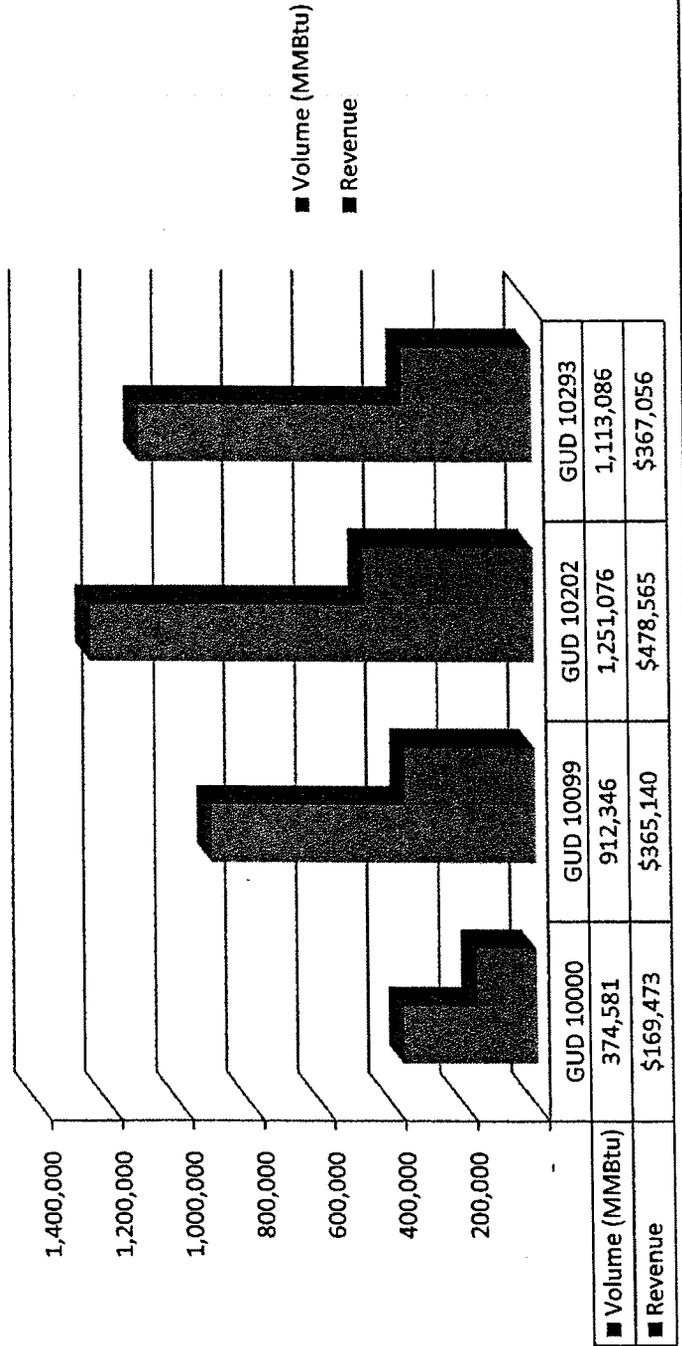


Exhibit D - Customers Gained and Lost

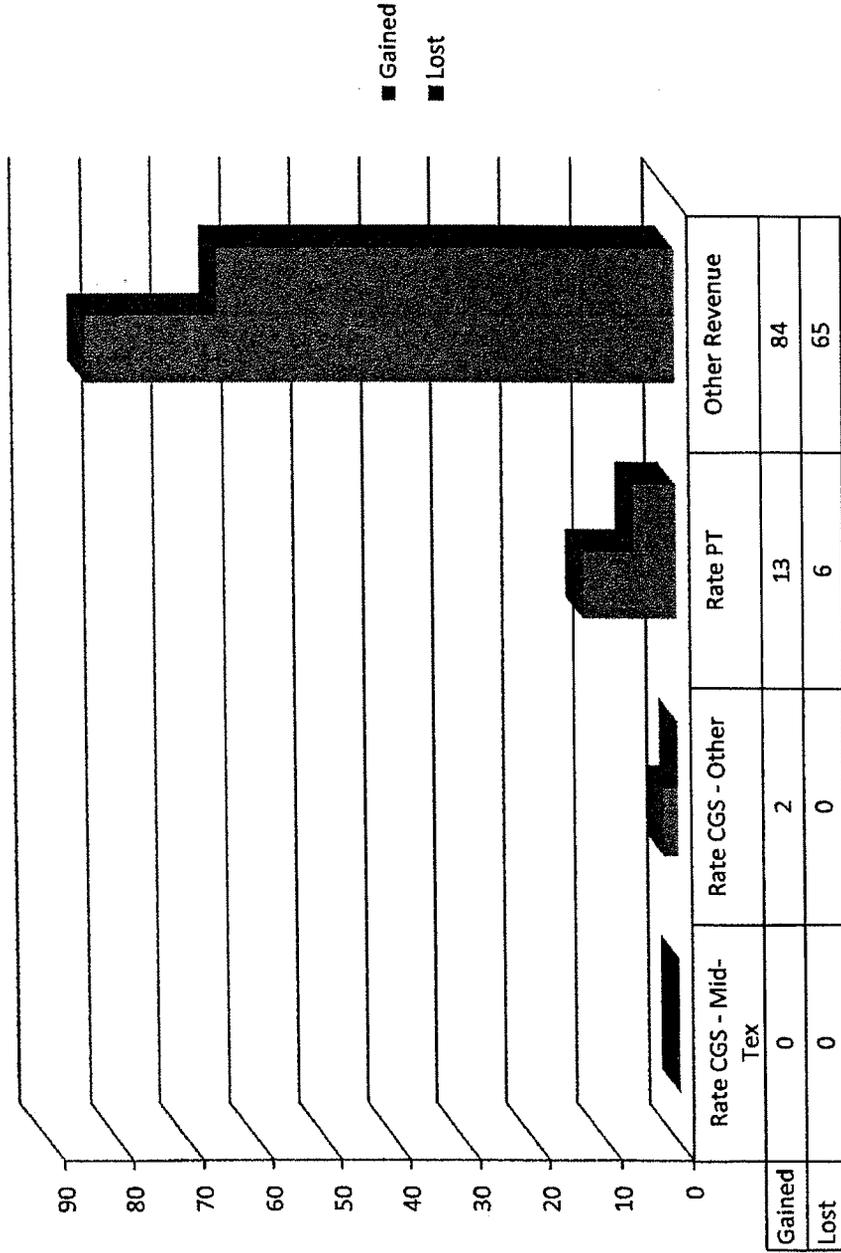
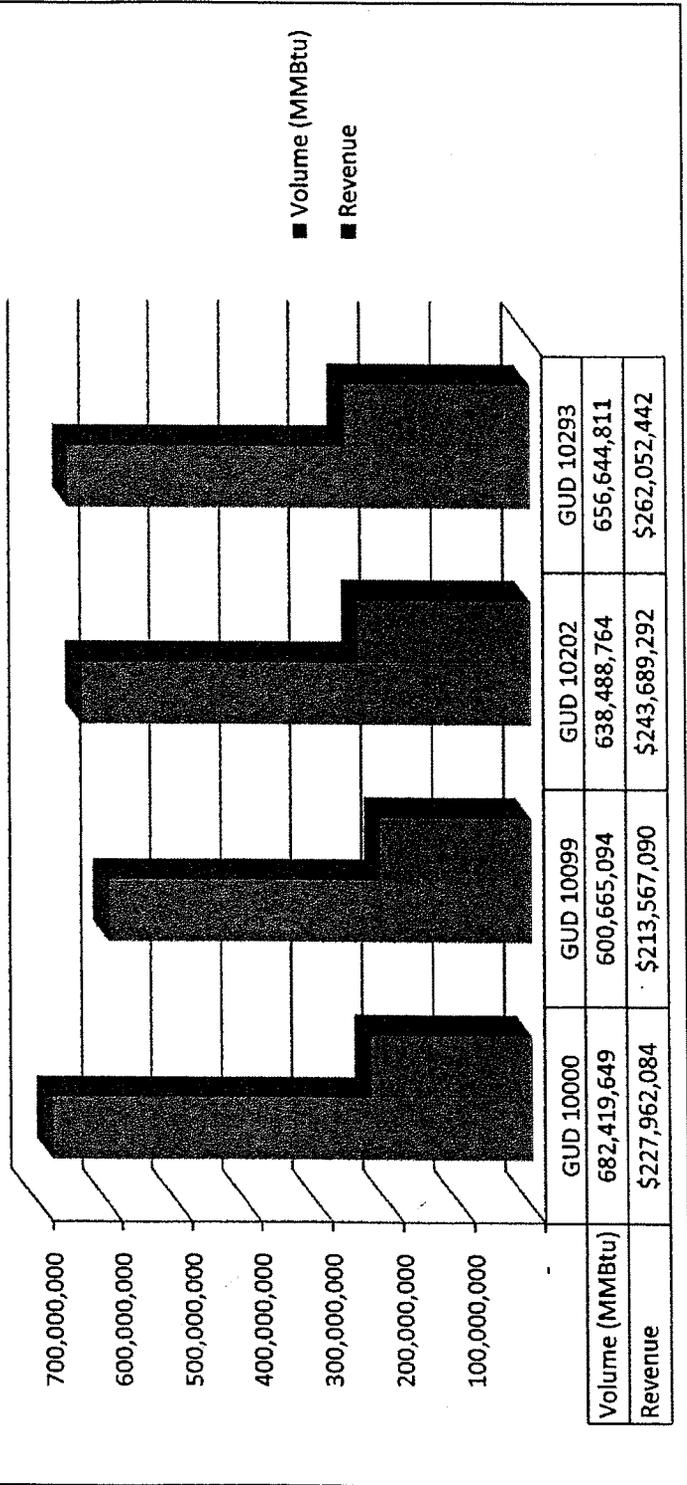


Exhibit 4

Exhibit E - Annual Volumes and Revenues



RIDER:	REV – REVENUE ADJUSTMENT	
APPLICABLE TO:	Rate CGS – Mid-Tex, Rate CGS – Other and Rate PT	
EFFECTIVE DATE:		PAGE: 16

Applicability

This Rider will apply to Rate CGS – Mid-Tex, Rider CGS - Other and Rate PT.

Adjustment Mechanism

Effective each November 1, rate schedules subject to this Rider will be adjusted based on the change in 1) the level of Other Revenue for the twelve-month period from July 1 of the prior year through June 30 of the current year from 2) the level of Other Revenue credited to the total cost of service in GUD Docket No. 10000.

Seventy-five percent of the difference between 1) the level of Other Revenue for the twelve-month period from July 1 of the prior year through June 30 of the current year less revenue related taxes and 2) the level of Other Revenue credited to the total cost of service in GUD Docket No. 10000 less revenue related taxes shall be allocated to the Rate CGS class and the Rate PT class in the same proportion as the Other Revenue was allocated to each class in GUD Docket No. 10000, as determined from the dollar amounts for Other Revenue Credit On Schedule J to the Final Order in GUD No. 10000, Columns (d) and (e), Line 6 for each class, respectively, as compared to the Total System Other Revenue Credit on Schedule J, Column (c), Line 6. The allocated portion of the difference in Other Revenue for each class shall be divided by the then current MDQ for such class, and that result shall be divided by 12 to calculate a monthly amount. The resulting amount shall be added to or subtracted from the capacity charge for each class.

Such adjusted capacity charge will then be adjusted for any Interim Rate Adjustments approved by the Commission after the issuance of the Final Order in GUD Docket No. 10000.

Adjustment Review Process

No later than August 15th of each year, Atmos Pipeline – Texas shall file with the Commission an "Other Revenue Adjustment" Report showing the following:

1. The actual Other Revenue billed by APT during the twelve-month period from July 1 of the prior year through June 30 of the current year by FERC Account;
2. A listing of the customers in the Other Revenue class by coded reference showing monthly volumes and monthly revenues for each customer;
3. The then current MDQ for each class (CGS and PT);
4. The Other Revenue allocation percentages for each class derived from Schedule J;
5. The calculations described in the Adjustment Mechanism Section of this Rider REV and supporting schedules;
6. A confidential cross reference listing of the Customer codes and names (for Railroad Commission Staff only);
7. A statement on whether or not the proposed adjustment would generate additional revenue of more than 2 ½% of Atmos Pipeline – Texas' annual per books revenue for the twelve-month period ending on June 30 of the current year; and
8. Proposed tariffs showing the proposed adjusted rates.

Atmos Pipeline – Texas shall provide notice to all directly affected customers by bill insert or direct mail within 30 days of the date of the filing of the Other Revenue Adjustment Report. The notice shall provide the customers with the proposed adjustment and contact information on where the customer can inspect a copy of the filing.

RIDER:	REV – REVENUE ADJUSTMENT	
APPLICABLE TO:	Rate CGS – Mid-Tex, Rate CGS – Other and Rate PT	
EFFECTIVE DATE:		PAGE: 17

The Commission shall have the opportunity to review the Other Revenue Adjustment Report and may submit discovery requests until the 40th day following the filing date of the Other Revenue Adjustment Report. Directly affected customers may also submit discovery requests until that date. The Commission shall advise Atmos Pipeline – Texas of its intent to approve, adjust or deny the proposed Other Revenue Adjustment on or before the 10th day before November 1 of the current year. Atmos Pipeline – Texas shall have the right to appeal the commission’s decision by filing a Motion for Rehearing with the Commission within 20 days following the issuance of the Commission’s decision.

Atmos Pipeline – Texas shall promptly reimburse the Commission for the cost of reviewing each Other Revenue Adjustment Report upon the invoicing of such cost.

The Other Revenue Adjustment, as adjusted by the Commission, shall be implemented on November 1, of the current year and shall remain in effect until revised on the following November 1st.

This Rider REV will expire on the fourth November 1st following its effective date unless an extension of Rider REV for an additional 3-year period is approved by the Commission. Atmos Pipeline – Texas may request an extension by filing such request with the third Other Revenue Adjustment Report. The request shall include a statement on how Rate CGS and Rate PT customers have benefited from the use of Rider REV, information on the number of customers gained or lost, the annual volumes and revenues for each of the three years on which adjustments have been based, the number of customers who have shifted from Rate PT to Other Revenue, and the number of customers who have shifted from Other Revenue to Rate PT.