



March 15, 2018

Ms. Kari French
Director, Oversight and Safety Division
Railroad Commission of Texas

Ms. French:

Please find attached for your review and approval the Atmos Energy Mid-Tex Division's Distribution Facilities Replacement Completion Report and Distribution Facilities Replacement Work Plan pursuant to the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule.

During the calendar year ending December 31, 2017, the Atmos Energy Mid-Tex Division replaced facilities based on an assessment of existing, known risk and in response to changing conditions that created risk as they presented themselves during the year (i.e. occurrence of leaks, newly identified threats, etc.). In total, the Mid-Tex Division replaced approximately 655,819 feet of steel main, 417,736 feet of cast iron main, 186,059 feet of plastic main, and 21,699 service lines. The Distribution Facilities Replacement Completion Report detailing the distribution facilities replaced by the Mid-Tex Division during the calendar year ending December 31, 2017 is included as an enclosure to this correspondence.

During the calendar year ending December 31, 2018, the Atmos Energy Mid-Tex Division will continue to replace facilities based on an assessment of existing, known risk and in response to changing conditions that create risk as they present themselves during the year. In total, the Mid-Tex Division plans to replace approximately 750,000 feet of steel main, 424,000 feet of cast iron main, 200,000 feet of plastic main, and 23,000 service lines. The Distribution Facilities Replacement Work Plan outlining the facilities proposed for replacement by the Mid-Tex Division during the calendar year ending December 31, 2018 is included as an enclosure to this correspondence.

Atmos Energy recognizes that risk characterized in the Work Plan is defined by 'known' conditions that exist within facilities in the distribution system at the time the risk assessment is performed and the Work Plan is established. A risk model cannot quantify unknown, undiscovered or unranked risk. Atmos Energy will take into account these 'unknown' conditions in any given year as they present themselves and may retire or replace facilities in order to mitigate these risks.

We appreciate the opportunity to update the Railroad Commission on work completed in 2017 and your consideration of our replacement plans for 2018. We look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Marlo A. Sutton".

Marlo Sutton
Director, Compliance, Mid-Tex

Enclosures (2)

Distribution Facilities Replacement Reporting

Atmos Energy Mid-Tex Division

Work Plan (2017)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	634,000	11,000	-
Cast Iron	396,000	-	-
Plastic	123,000	3,000	-
Misc	-	-	26,000
Grand Total	1,153,000	14,000	26,000

Completion Report (2017)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	655,819	15,057	-
Cast Iron	417,736	-	-
Copper	-	488	-
Plastic	186,059	6,154	-
Misc	-	-	39,604
Grand Total	1,259,614	21,699	39,604

Work Plan (2018)

Material	Distribution Piping (ft)	Service Lines (ea)	Components (ea)
Steel	750,000	17,000	-
Cast Iron	424,000	-	-
Plastic	200,000	6,000	-
Misc	-	-	36,000
Grand Total	1,374,000	23,000	36,000

Distribution Facilities Replacement Completion Report (2017)

Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
A27	131059							1
Abbott	610001				1			
Abilene	211069	684	34550	2229	183	292		590
Addison	610005			1300	7	14		4
Alba	310012							1
Albany	611443		2996	539	33	21		55
Allen	610007		944	369	11	14		422
Alma	610009			2281		1		4
Alvarado	610012				2	1		3
Alvord	610013		2079	745	14			17
Anna	610018		320			3		290
Anson	211075		360		2	2		2
Archer City	611445				6	2		2
Argyle	610021		110			1		36
Arlington	610023		6933	11759	582	673	3	1936
Athens	310028		1625	77	19	1		24
ATHENS NATL GAS (Dist)	310198							2
Aubrey	610031			194				2
Aurora	611082							3
Austin	411519							330
Austin (MS8854)	411281							1
Avalon	610033			2791		21	1	10
Avery	310056				1	0		
Avoca	211077		788					
Azle	610036		94		5	3		11
Baird	611446		65		6			1
Balch Springs	611383		910		153	0		15
Ballinger	211078		10108	3904	31	19		85
Bandera	410111				2			2
Bangs	611447				20	0		4
Bardwell	610038				1			
Bartlett	410115				3			1
Bedford	610042		380	46	9	86		598
Bellmead	962845		723	0	2			
Bells	610044					1		4
Belton	410950		1435	6	16	3		5
Ben Wheeler	310076							1
Benbrook	611434		424	8	7	29	5	82
Benjamin	110880		270					2
Bertram	410132		469	2008	3	6		13
Beverly Hills	962847		5		35			
Blanket	611448		482		2			2
Blossom	310095				1			1
Blue Mound	612123				1			2
Blum	610048				1			1
Bogata	310099				1	1		1
Bonham	310101		680	437	29	2		32
Bowie	610053		230		12	1		12
Boyd	610055		280		1			4
Brashear	310103				1			
Bremond	410978		0		0	1		
Bridgeport	610058		677	196	13	2		17
Bronte	211082				5			1
Brownwood	611449		2732	20	10	16		28
Bruceville-Eddy	610065		59		1	1		2
Brushy Creek	411255							1
Bryan	411071		7796	63	129	41		437
Buckholts	410939		2		2			1
Buffalo	311779				1			
Burkburnett	611451		1553	18	19	5		41
Burleson	610071		240	429	4	2		132
Burnet	410161			56	108	29		125
Byers	611455				15			2
Caddo Mills	310124				0			
Caldwell	411076		200	322	6			17
Calvert	411041		1127		9	5		13
Cameron	410940		72		27	1		7
Campbell	310125			5				
Canton	310127		722	14	2	3		9
Carbon	611458							1
Carey	110092					3		6
Carlsbad	211085		1252		1			1
Carrollton	610077		2288	429	34	209		422
Cayuga	311480							1
Cedar Hill	610084				22	2		20
Cedar Park	411284			546		0		158
Celeste	310139				1			

Distribution Facilities Replacement Completion Report (2017)

Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Celina	610089		1430	193	1	12		305
Center Point	410186				1			1
Centerville	310141		390	37	6			5
Chandler	310145		834	61	1	2		6
Chapel Hill	310968				1	1		2
Chico	610098				1			1
Childress	110099		1497		25	10		12
Chillicothe	111024							1
Chilton	410979		975	6	3	4		1
Cisco	611460	464	1610		15	1		3
Clarksville	310161		9		2			2
Cleburne	610103		1992	132	77	104		37
Clifton	610107		5059		27	5		10
Clyde	611461		201		4	1		5
Cockrell Hill	610134		933			20		22
Coleman	611465		0			0		7
College Station	411071		837	804	33	7		356
Colleyville	610113			838	1	7		122
Collinsville	610114							1
Colorado City	211089		150		6	2		4
Comanche	611466		3097	57	8	15		18
Comfort	410209				3	2		7
Commerce	310168		2276	2	10	1		4
Cooks Point ML-02	411078							1
Coolidge	610121				0			
Cooper	310174				1	1		1
Coppell	610122				10			79
Copperas Cove	410945				3			2
Corinth	610125							78
Corsicana	310177		14822	3592	19	37		166
Corsicana ML-05	310178							2
Covington	610129				1			
Crandall	310192		201					2
Crawford	610130							2
Cross Roads	611198					1		7
Crowley	611435		2			1		5
Dallas	610134	219906	61935	2200	2776	165	8	4728
Dalworthington Gardens	611425							1
Dawson	311780		2743	50	26	5		29
De Leon	611468	500	717	235	6	1		4
Decatur	610150		530		9	2		12
Denison	610153		1774	204	20	5		76
Denison (Saddle Creek)	610153							14
Denison Grayson Co IP	610268							4
Denison ML-05	610159							1
Denton	610162		22114	6563	69	168		448
Deport	310239			26	0			
DeSoto	610148				9	3		67
Dodd City	310248				1			1
Dublin	611470							
Duncanville	610180				330	3		386
E10-2 HP	632426							2
Early	611471		2217	671		1		5
Eastland	612219		4262	363	44	4		23
Ector	310280		0		1	0		1
Edgecliff Village	611436		233	6350	2	14	5	204
Electra	611474		258		26	0		3
Elm Mott	610189				4			5
Elmo	310290			5				
Emhouse	310293					1		4
Emory	310294		1121		4	1		5
Ennis	610191		3668	2246	13	12		30
Eules	610200				38	0		154
Eustace	310312				0			1
Evant	411118				1			1
Everman	612054				34	2	1	33
Fairfield	311900		338		13	7		22
Fairview	962834							43
Farmers Branch	610208		84	2993	490	77		555
Farmersville	612203		7		3			4
Fate	610209				2			104
Ferris	610210			471	14	1		11
Flower Mound	610215		120	631				160
Forest Hill	612055			15		2	1	8
Forney	310325		1593	713	7	8		291
Forreston	610216				1			1
Fort Gates	411037							1

Distribution Facilities Replacement Completion Report (2017)

Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Fort Worth	610226	135473	113904	18160	3350	777	441	6394
Fort Worth (Alliance Area)	612545							15
Fort Worth-Chadwick Farms	610226							1
Fort Worth-Sendera	610226							153
Franklin	411043		2522	12	4	3		24
Frankston	310329							2
Fredericksburg	410285		0		39	1		59
Fredericksburg (MS6836)	411528							10
Frisco	610233			936	1	1		178
Frisco ML-02	610233							1
Frost	310335		1709		4	6		1
G & Moss Lake System	610242							2
Gainesville	610237		1479	379	1	6		22
Gainesville ML-03	610241							5
Garland	610244		13700	5748	1436	668	1	2102
Gatesville	411038		2367	546	19	0		10
Georgetown	411289				41	2		195
Glen Rose	610256		473	58	2	1		2
Glenn Heights	610180					1		5
Godley	610259				0			
Goldthwaite	611995			5	6			3
Gorman	611478							1
Granbury	610263		480	109	6			7
Grand Prairie	610265		13226	493	194	220	2	706
Grandview	610266				2			1
Granger	410309		0		17	1		1
Grapevine	610267		4317	3018	39	21		135
Greenville	310388			5	10	3		17
Greenville ML-11	310390							1
Groesbeck	612001				4			82
Gunter	610274		1802	23	6	3		16
Gustine	611479				4			6
Hagansport R/W	310404							1
Haltom City	612026		1015	2	3	22	5	42
Hamilton	411119		222		43	1		1
Hamlin	211099				2			1
Harker Heights	411047					0		3
Haskell	110884				15			2
Haslet	610282		23					3
Hearne	411044		0		40	2		15
Heath	610283			188		0		131
Henrietta	611482		626	260	9	4		14
Hewitt	962848							1
Hickory Creek	610336					10		67
Hico	611999		1239	5	5			
Highland Park	612100	11015		11	184	2		280
Highland Village	610352				1	2		22
Hillsboro	610288		2814	518	22	6		11
Holland	410339				2			
Holliday	611483		4404	1905	34	36		63
Honey Grove	310440				14			1
Howe	610292				3			11
Hubbard	610293				12			
Hurst	610297		7	5	123	373		193
Hutchins	610298				3			3
Hutto	411280		151	40	12			188
Iowa Park	611484		1930	444	1	11		44
Irving	610304		6042	319	29	25		253
Italy	610308				6			3
Itasca	610309		65	9	12			4
Josephine	612205			0		3		4
Joshua	610315				1			2
Justin	610321							4
Kaufman	310501		94	675	11	11		18
KC (West) HP	963146							1
Keene	610323				4			1
Keller	610324				1	1		112
Kemp	310502				5			1
Kennedale	612056		1			2		47
Kerens	310503		6950	2365	3	16		47
Kerrville	410360		2212	33	105	11		113
Killeen	411048		1045	5	178	18		61
Kirkland	110273		7	4389				2
Knox City	110885		431	4	3			2
Kosse	610332				1			1
Krum	610333				3			6
Lacy Lakeview	962850		2610	128	2	10		16

Distribution Facilities Replacement Completion Report (2017)
Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Ladonia	310530					1		1
Lake Dallas	610336				1	1		10
Lake Worth	612669							5
Lakeport	311484				1	1		2
Lakeside	612668					1		6
Lampasas	411611		292		21	1		25
Lampasas ML-02 (Horseshoe Add)	411610							1
Lancaster	610341		800	2440	10	3		20
Lavon	610347							1
Lawn	211108		48		2			2
Lawrence ML04	310539							1
Leander	411294			166				1007
Leona	311916				0			2
Leonard	310546		510	95		1		12
Lewisville	610350		110	246	12	23		101
Lexington	410400				8			4
Liberty Hill	411294							1
Lillian	610358				1			1
Lindsay	610360		725	8	1			2
Lindsay ML-02	610361							1
Lipan	611491		1220	23	1	1		5
Little Elm	610946			10				4
Little River-Academy	410954				5			4
Llano	410488		7		10			8
Lockett ML-10	611492							1
Lone Oak	310872							1
Longview	310882		3241		20	3		38
Lorraine	211109					1		1
Lorena	610955				1			1
Lott	410981		12988		0			1
Lueders	211110		528	100	11			3
M8	632467							1
Mabank	310903					1		2
Madisonville	311631		724		32	5		14
Malakoff	310904		378	25	8			1
Malone	610963		989	280	4	2		5
Manor	410510				1			40
Mansfield	610964			2016	4	27		382
Marble Falls	410512		1575	7	20	5		26
Marlin	410982		537		13	3		24
Mart	610965		425			1		3
May	611500		58		9			1
Maypearl	610966				4			2
McGregor	610967		7759	2929	61	69		174
McKinney	610969		718	1848	7	18		1147
McKinney (Trinity Falls)	610969							144
McKinney (Trinity Falls) HP	610969							39
McKinney ML-03 (Rose Garden)	610971							1
McKinney ML-04	612541							79
McLendon-Chisholm	611090							74
Melissa	610975			40	2			1
Megargel	611501							246
Meridian	610976				4			2
Merkel	211113				14			2
Mesquite	610980		899	19	7	6		33
Mexia	610983		865		133	20	1	18
Midlothian	610984				7	1		57
Midway	311632				1			
Miles	211114					0		
Milford	610986		97		1			3
Montague	610993				1			1
Moody	610995				15			
Moran	611502		20					
Morgan	610996				2	1		
Muenster	610998		463	21	3			2
Munday	110894		907	2	1	1		
Murphy	610999							8
Newark	611004				2			1
Newcastle	611503							1
Nocona	611016		1131	0	2			10
Nolanville	411050							6
Normangee	311633				4	3		4
North Richland Hills	612028		117	279		5	7	227
North Richland Hills ML-01	610221							1
Northlake	612545							2
North Zulch	311634				5			247
Novice	611504				0			118

Distribution Facilities Replacement Completion Report (2017)

Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Oak Point	611198							
Oakwood	310999				0	0		2
Oglesby	611035		776		5			4
Olden	611510				2			
Olney	611511		3408	0	10	4		9
Osceola	611039							15
Ovilla	611072			11494		4		1
Palestine	311008		9374	383	17	3		26
Palmer	611040				1	2		11
Pantego	611426		2					17
Paradise	611043				1			2
Paris	311017	317	9475	966	62	9		26
Paris-Arthur City Line E16	311082							4
Paris-Reno Line E	964910							1
Parker	610999							23
Petrolia	611515			41	4	1		4
Petty	311041					1		
Pflugerville	411296			786				627
Pilot Point	611052			10	7			7
Plano	611054		2556	21123	13	362		574
Point	311079				2			2
Ponder	611057				1			1
Pottsboro	611061				2			9
Powell	311083				1			
Poynor	311086				1			1
Princeton	611064		218		1	2		26
Prosper	611070		8250		2			564
Quannah	110900		1818		32	6		13
Quinlan	311096			10	1	1		4
Quitman	311097		650	744	7	2		6
Ranger	611517		1232		9			6
Red Oak	611072				2	1		11
Rendon	611435		8					1
Retreat	311157					1		1
RFB HP	963148							1
Rhome	611082				0			1
Rice	611959				3	2		12
Richardson	611083		8894	4182	13	57		180
Richland	311159		20	105				1
Richland Hills	612027		6643	142	3	15	2	36
Riesel	611085					1		9
Rio Vista	611086				0			1
River Oaks	612670							15
Roanoke	611089		2487	617	12	3		108
Robert Lee	211123				1			1
Robinson	962853		729	989	12			10
Roby	211125		222					1
Rockdale	410626				10	1		5
Rockwall	611090		1155	3534	2	46		258
Rogers	410942				2			1
Roscoe	211127							1
Rosebud	410943		9		9	1		16
Ross	611104				1			
Rotan	211128		54		0			
Round Rock	410633			408	2			1314
Rowlett	611105			5	1	2		122
Roxton	311171		519	60	1			6
Royse City	611114		2120			28		38
Rule	110905				1			
Runaway Bay	611117				2		2	3
Sabine	310552			320				3
Sachse	611119							100
Sadler	611120							1
Saginaw	611121			320	72	175	1	339
Saint Jo	611122		370		6			
San Angelo	211132		41271	1535	201	195		421
San Saba	611996		61	5	12			12
Sanger	611125		440	2108	1	1		35
Sansom Park	612671							8
Santa Anna	611521				8			2
Santo	611522				1			1
Savoy	611126				0			
Seagoville	611387		2320	12	106	3		18
Seymour	611523				4			8
Shady Shores	611132			48	1			5
Sherman	611136		6032	2414	29	10		109
Sherman HP 100#	611136							1

Distribution Facilities Replacement Completion Report (2017)

Atmos Energy Mid-Tex Division

City	System ID	Distribution Piping Material (Feet)			Service Line Material (Each)			Components (Each)
		Cast Iron	Steel	Plastic	Steel Services	Plastic Services	Copper Services	Components
Snyder	211139		2897	1	9	1		30
Southlake	611162		6	290	2	1		145
Southmayd	611163				1			2
Springtown	611165		1590	13	10	1		4
Stamford	211478		4107	443	15	1		2
Star Harbor	311228					0		1
Stephenville	611556		1560	275	10	7		8
Strawn	611526				2			
Streetman	311901				0			
Sulphur Springs	311237		5463	4234	39	26		153
Sunnyvale	611388							65
Sunset	611183				1			1
Sweetwater	211142				22	4		62
Taylor	410708		5459	29	413	109		30
Teague	311902		801		2	2		2
Temple	410955		769	58	378	19		384
Terrell	311258		812	843	1	26		9
The Colony	610116			2483		9		63
Thorndale	410777				5	4		5
Thornton	611366				3	1		5
Thrall	410780				2			3
Throckmorton	611529		717		5	2		5
Tioga	611194		3913	1756	10			33
Trent	211148				1			1
Trinidad	311315				1			1
Toco ML-26	311297							1
Tom Bean	611195							1
Trenton	311310							2
Trophy Club	612301							35
Troy	410975		8		1			2
Tuscola	211150		108		4			1
Tye	211152		152	4053		1		1
Tyler	310041		163	119		2		1
Tyler ML-11 (Old GE Plant)	310031							1
Tyler ML-40	311869							
University Park	612099	11250	3334		223	17		273
Valley Mills	611211		2580		21	11		22
Valley View-Cooke	611212		250					
Van Alstyne	611213		1593	406		1		6
Venus	611214				3			2
Vernon	611532		918			14		32
Waco	611218	38127	16956	2824	589	36	1	963
Walnut Springs	611228				0			
Watauga	611229			997		1		7
Waxahachie	611230		4552	651	36	24		171
Weinert	110910		2373		0			
Wells Branch	411519							4
West	611240		3917	273	4	11		16
Westlake	611243							13
Westover Hills	610226						1	
Westworth Village	612672		3742	33	21	42		42
White Settlement	612673		0	4	2	25		35
Whitehouse	311383			187	5	4		34
Whitesboro	611248		1150	50	4	3		12
Whitewright	611251					1		1
Whitney	611252				2			1
Wichita Falls	611539		12323	650	58	69		363
Wilmer	611264				26	4		5
Windom	311396				1			
Wingate	211159		6052	418	5	2		7
Winters	211160		134		5			1
Wolfe City	311402				3			2
Woodway	962861				32			1
Wortham	611271		4280	1008	17	14		44
Wylie	611273		20			1		141
Yantis	311408				1	1		2
Summary		417,736	655,819	186,059	15,057	6,154	488	39,604