

**Atmos Energy's Responses to Data Requests
(Provided May 2, 2024)**

Data Request from 4/24/2024 @2:33pm (Due May 2)

1. On Q28, for the list of mechanical couplings that was provided, include all known attributes for the couplings (e.g. style, manufacturer, type (stab, bolted, nut), diameter, material type (PE, PVC)), in Excel format

A new spreadsheet with the requested information will be uploaded to Kiteworks as JXN-NTSB-001609. Consistent with Q28, this data relates to couplings known on 1-30-2024 in a 2 mile radius in Jackson shown on JXN-NTSB-000322-000330. Many of the data fields requested are unknown because installation of the facilities occurred before regulations for record keeping came into effect and Atmos Energy's predecessor company did not collect this information. Our records are supplemented with additional information during subsequent repair work.

2. To follow-up on response to Q87, for the repaired leaks in the 5-mile radius, provide leak number, date of discovery, leak grade at discovery, date of repair, highest recorded grade, asset information (material, material sub-type, inst. date, coating type, CP status), leak cause, and all additional/explanatory notes available – in excel format. Identify (highlight) all leaks specifically due to MFF.

A new spreadsheet with the requested information will be uploaded to Kiteworks as JXN-NTSB-001644. Consistent with Q87 and 76(a)), this data relates to leaks that were open on 1-24-2024 in a 5-mile radius with the origin at the Jackson, MS city center as shown on JXN-NTSB-000853. The listed repairs are current through April 22, 2024.

3. For the question above, provide a list of MFF leaks, where the fitting was not known to be present prior to leak repair (refer partially, to answer for Q28).

There is a single leak (LEAK 845889) in the dataset for repaired leaks within the 5-mile radius that qualifies as a "mechanical fitting failure" under PHMSA's reporting criteria (192.1009) where the fitting was not known to be present prior to the leak repair. That leak (LEAK845889) has been highlighted in the JXN-NTSB-001644 dataset as requested.

4. What is Atmos using for the cause of leak classification? Please provide the procedure and refer to the specific section.

Leaks are classified according to Atmos Energy's Leak Management Program, the elements of which are described in Appendix D.2 of the Distribution Integrity Management Plan ("DIMP") (JXN-NTSB-000932-001075). The cause of a leak is identified according to the threats/risks identified below, and that data is then used to help inform our understanding of existing or potential threats to the distribution system. Chapter 5 of the DIMP states:

“As a result of the surveying of distribution systems and the subsequent locating, grading, and repair and/or monitoring of leaks found within those systems, Atmos Energy’s Leak Management Program contributes directly to the mitigation of the following threats or risks:

- Corrosion**
- Excavation Damage**
- Natural Force Damage**
- Other Outside Force Damage**
- Materials**
- Joints/Welds**
- Incorrect Operations**
- Equipment Failure**
- Other”**

5. Would mechanical fitting failure leaks be recorded in your DIMP data as equipment failure, material failure, natural forces, outside force damage? Provide detailed explanation.

The failure of a mechanical fitting can result from varied causes, and the attribution of the cause of the failure and associated leak determined at the point of repair varies (i.e., equipment failure, natural forces, etc.). The failure is applied within Atmos Energy’s DIMP according to the cause.

6. List of current SMEs for DIMP, provide corresponding SME forms.

A list of current SMEs with relevant experience for DIMP in the Mississippi division will be uploaded as JXN-NTSB-001741.

7. Summarize how the leak repair process works, including who is responsible for the leak repair decision and execution (reference applicable procedures). Provide the title and qualification requirements for the positions.

Operations and Technical Services work collaboratively to repair leaks within the Mississippi Division. Grade 1 leaks are typically repaired by Atmos company crews. Operation Supervisors, Field Construction Coordinators, and Crew Leaders all play key roles in the Grade 1 leak repair process relative to determining how to perform the repair and then executing on it. Contract crews typically repair the majority of Grade 2 and 3 leaks in the Mississippi Division. Since these leaks are non-hazardous, they are scheduled for repair in accordance with the repair guidelines contained in Chapter 9 of Atmos Energy’s O&M Manual (see JXN-NTSB-00032-00060). In general, the contract crews are assigned specific leaks to repair by Atmos personnel, and Atmos Operation Supervisors and Field Construction Coordinators monitor the work. The Construction/Project Management Group within Technical Services monitors the number, location, and repair timelines of outstanding Grade 2 and 3 leaks across the Mississippi Division and works with Operations to provide sufficient contract resources to make the needed repairs within the required timelines.