

16. For PSMS – provide a short summary of how Atmos got started with PSMS and Atmos’s history with it leading up to the accident, include any major milestones, assessments, improvements, etc.. Also provide a summary how Atmos is measuring the effectiveness/Level 5, could not determine from the maturity assessments provided.

A description of Atmos Energy’s efforts to develop, implement, and mature its API RP 1173 Pipeline Safety Management System (PSMS) was provided via email on March 15, 2024 at 9:43am (central time). The following related documents have also been uploaded to Kiteworks:

- **JXN-NTSB-001281-001284 (PSMS API RP 1173 Implementation Guidance)**
- **JXN-NTSB-001285-001291 (PSMS Maturity Assessment (2022))**
- **JXN-NTSB-001292-001302 (PSMS Maturity Assessment (2023))**

Atmos Energy is currently using the API Implementation Tool to evaluate, track, and summarize its development and implementation of programs and procedures to conform to API RP 1173. The Implementation Tool ranges from Level 0-4. There is a separate Evaluation Tool which does contain a Level 5, but Atmos Energy is not currently using this tool because it has not achieved maturity across most elements of its program, which is required before beginning to use the Evaluation Tool.