

#### ***IV. Historical Data***

Data that is readily available at the time IM plans are prepared or revised will be considered. As a general practice, no attempt will be made to specifically search for unknown design, construction, or O&M records to augment missing data. Missing data, or data gaps, may originate from differences in historical O&M and construction practices and procedures as well as the differences in the data management processes of the companies that Atmos Energy acquired over the years.

Going forward and recognizing the data gaps that exist, Atmos Energy will continue to build its system knowledge through an iterative process during which data becomes available and is captured through routine construction and O&M activities. When gaps are identified Atmos Energy will utilize O&M activities, field surveys, construction activities, and other excavation opportunities to capture needed data.

#### ***V. IM Region Establishment***

Atmos Energy operates distribution systems over a wide geographic area from sparsely populated rural areas to high-density urban locations. Distribution systems vary in complexity from small diameter, low-pressure systems to distribution systems that have multiple operating pressures with various pipe attributes.

IM Regions may include mains, service lines, and/or other related distribution facilities. The diversity of distribution systems operated by Atmos Energy is matched with a similarly diverse approach to establishing IM regions for risk analysis purposes. Atmos Energy may consider distribution systems and associated facilities, either singularly or grouped, as a single IM Region for risk analysis purposes. In other cases, it may be helpful to subdivide a single distribution system and associated facilities into multiple IM regions based on physical and operating characteristics such as construction, materials, operating pressure, vintage, etc. and/or as related to location in terms of a grid, town, cost center, or other such similar boundary.

#### ***VI. Risk Assessment Methodology***

Atmos Energy will use operator knowledge and professional judgment in conjunction with a risk assessment tool to identify, assess, and rank the risk of IM Regions. The risk assessment tool calculates a numerical risk factor based on the likelihood of failure (LOF) and the consequence of failure (COF) for selected IM Regions for each threat category.

Atmos Energy assesses risk for each IM Region. IM Region considerations may be assessed by the risk assessment tool or identified and evaluated by SMEs.

### **03) *SYSTEM KNOWLEDGE***

#### ***I. General***

Atmos Energy will gather and consider readily available information about the company's infrastructure from existing records of design, construction, and O&M activities, One Call system information, excavation damage, and SME(s) input. Atmos Energy will not expose buried facilities for the sole purpose of obtaining additional data but will continue to collect data in conjunction with normal construction and O&M activities. Descriptions of data that could be used to gain system knowledge to identify threats, evaluate risks, and identify mitigating actions that reduce risk are contained in the remaining portions of this chapter.

#### ***II. PHMSA 7100.1-1 Annual Report Information***

In order to develop basic knowledge and understanding of Atmos Energy's distribution systems, each Division's pipe data relative to mileage, type of material, installation decade, and leakage at a state level can be found by reviewing the annual PHMSA Form 7100.1-1, Annual Report for Gas Distribution Systems. Atmos Energy files a separate Form 7100.1-1 for each PHMSA Operator ID.

#### ***III. IM Region Data***

IM Region data, as available, shall be gathered for use in the risk assessment from both company database systems and SMEs. The following systems house and provide key data related to Atmos Energy's assets as well as its construction and O&M activities: Enterprise Asset Management system (eAM), the Compliance Management Plus system (CM+), and the Geographical Information System (GIS).

IM Region data includes but is not limited to:

- Pipe Size
- Material
- Pressure
- Vintage (Age)
- Number of Leaks