

August 31, 2026

Via Email to PSCED@ky.gov

Mr. Justin McNeil
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

RECEIVED

AUG 31 2026

**PUBLIC SERVICE
COMMISSION**

Re: *Mary Anne Campbell v. Atmos Energy Corporation*
Case No. 2025-00410

Dear Mr. McNeil:

Please find attached for electronic filing with the Commission, Atmos Energy's Answer to Complaint and Motion to Dismiss in the above-styled case.

This is to certify that this is a true and accurate copy of the document that was filed via email with the Commission on August 31, 2026. A copy of this filing was emailed and mailed via U.S. Mail on August 20 2026 to the Complainant.

If you have any questions, please let me know.

Sincerely,

Heather S. Temple

Heather S. Temple

Enclosure

**Answer COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

MARY ANNE CAMPBELL	COMPLAINANT	)	
		)	
V.		)	CASE NO.
		)	2025-00410
ATMOS ENERGY CORPORATION	DEFENDANT	)	

ANSWER TO COMPLAINT AND MOTION TO DISMISS

Comes now Atmos Energy Corporation (“Atmos Energy” or “the Company”), by counsel, pursuant to the Commission’s August 10, 2026 Order directing Atmos Energy to Satisfy or Answer the Complaint filed by Mary Anne Campbell on December 22, 2025. Atmos Energy respectfully answers as follows:

1. Ms. Campbell has at least two residential accounts with Atmos Energy. On the two accounts in question, Ms. Campbell requested that service be disconnected in May of 2025, and Atmos Energy completed those requests. Ms. Campbell requested that service be reconnected on both accounts on October 9, 2025, and Atmos Energy completed those requests. Atmos Energy then billed both accounts on the billing cycle applicable to each. One bill shows the Date of Service from 10/9/25 through 10/16/25, and the other shows the Date of Service from 10/9/25 through 10/14/25.¹

2. On October 24, 2025, Ms. Campbell called Atmos Energy’s contact center to request clarification regarding the “customer charge” (which is how the fixed monthly Base

¹ Campbell Complaint at unnumbered pages 5-8.

Charge is labeled on customer billing) on her two accounts for October. During that call, Atmos Energy's customer care representative explained the customer charge and also made courtesy adjustments to both accounts (\$10.00 and \$11.00, respectively) due to her excellent payment history. Please see Exhibits A and B to this Answer for the bills that reflect these credits. On November 24, 2025, Ms. Campbell again called Atmos Energy's contact center for clarification regarding the calculation of her November billing and the application of the two credits. The customer care representative explained the calculation, and Ms. Campbell confirmed that she understood that the two credits had been applied to reduce her bills.

3. Also on October 24, 2025, Atmos Energy received a "PSC Consumer Inquiry System" email from the Commission regarding a call from Ms. Campbell. Atmos Energy responded to Commission Staff on October 29, 2025. Please see Exhibit C to this Answer. As explained further below, Atmos Energy's response to the PSC Consumer Inquiry explained that Ms. Campbell was correctly billed the Base Charge for the two accounts in question.

4. Atmos Energy's General Firm Sales Service Rate G-1 establishes a monthly Base Charge per meter for residential service. This monthly Base Charge is designed to recover fixed costs incurred by Atmos Energy that are not dependent on the volumes of gas the customer consumes. In other words, Atmos Energy bears these costs on behalf of each residential customer regardless of the quantity of gas consumed at the residence during the billing month. However, there are some customers that do successfully avoid paying this monthly Base Charge by disconnecting and reconnecting service seasonally for any months in which they take no natural gas service for any portion of the month. When those customers reconnect service in the middle of a billing period, they are billed the full monthly Base Charge just like any new customer that

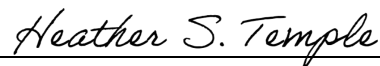
connects during the billing period.² There is no provision in the Company's tariff that provides for proration of this Base Charge.³ To the contrary, there is a provision in the tariff that "[a] season charge may be assessed when the customer's service has been disconnected at his request and at any time subsequently within (12) months is reconnected at the same premise."⁴

5. Since there is no provision in Atmos Energy's tariff or in Commission rules and regulations that would direct Atmos Energy to prorate the Base Charge, Ms. Campbell's complaint fails to establish a prima facie case that Atmos Energy is in violation of any statute, regulation, or tariff provision and this matter should be dismissed.

WHEREFORE, on the basis of the foregoing, Atmos Energy respectfully requests the Commission dismiss Ms. Campbell's complaint because it does not establish a prima facie case that Atmos Energy violated a statute, regulation, or tariff.

This 31st day of August 2026.

Respectfully submitted,



L. Allyson Honaker
Heather S. Temple
Meredith L. Cave
HONAKER LAW OFFICE, PLLC
1795 Alysheba Way, Suite 1203
Lexington, KY 40509
(859) 368-8803
allyson@hloky.com
heather@hloky.com
meredith@hloky.com

Counsel for Atmos Energy Corporation

² While Atmos Energy's tariff does not provide for proration of the monthly Base Charge, Atmos Energy does remove a portion of the Base Charge if the customer's active service dates do not align with the billing period. For this reason, Ms. Campbell actually paid less than the full \$25.00 Base Charge on her October bills on each account because the number of service days was not equal to the number of billing days.

³ Atmos Energy Corporation Tariff, P.S.C. Ky N. 2, Eighth Revised SHEET No. 8.

⁴ Atmos Energy Corporation Tariff, P.S.C. Ky N. 2, Original SHEET No. 69.

CERTIFICATE OF SERVICE

This is to certify that true and accurate copy of the foregoing has been emailed to the Kentucky Public Service Commission at PSCED@ky.gov. In addition, a true and accurate copy of the foregoing was placed in the U.S. mail, postage prepaid, on August 31, 2026, addressed to the following:

Mary Anne Campbell
220 East Elm Street
Marion, Kentucky 42604

319 South Main Street
Marion, Kentucky 42604

Heather S. Temple

Counsel, Atmos Energy Corporation



Account Number: [REDACTED]

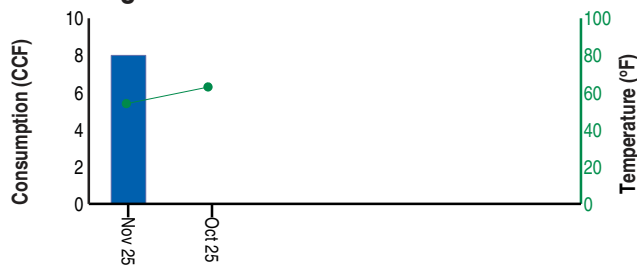
Customer Name: MARY CAMPBELL

Service Address: [REDACTED]

DUE DATE
12/02/25TOTAL DUE
\$34.78

TO BE DRAFTED ON 12/02/2025

Gas Usage Trend



Account Summary

Billing Date: 11/13/25

Previous Balance 26.06

Payment(s) -16.06

Past Due Balance 10.00 **ACTION REQUIRED**

Current Charges 24.78

Past Due Balance:**\$10.00****Current Charges:****\$24.78**

(see reverse for billing details)

Important Messages from Your Natural Gas Company

HELP YOUR NEIGHBORS STAY WARM

Many of your neighbors will not be able to pay their gas bills this winter. Help them stay warm by donating to Atmos Energy's Sharing the Warmth Program. Here's how to donate:

-On the back of your gas bill, select Round Up or check the amount you wish to contribute,

-Visit www.atmosenergy.com/share or call 1-888-286-6700 to find out more information.

Your tax deductible donation is added to your monthly bill. You can change or end your donation at any time. All donations will assist the elderly, disabled and families in need.

SMELL GAS? ACT FAST!

Leave the area immediately! Then call 911 and Atmos Energy at 1-866-322-8667.

A copy of applicable rates may be found at www.atmosenergy.com/KYtariffs.

Please pay past due balance promptly

If current bill is not paid by the due date, a penalty (if applicable) will appear on your next bill and any prior amounts already past due may result in service disconnect. Please contact us online or by phone for assistance.

For instructions on reading your Atmos Energy bill, please visit www.atmosenergy.com/yourbill.

CONTACT US:

Emergency Phone 24/7: 1-866-322-8667

Customer Service M-F 7am - 6pm CST:

1-888-286-6700

Scan Here



To Make a Payment

SIGN UP FOR BUDGET BILLING

SO YOUR WINTER GAS BILLS ARE MORE PREDICTABLE

Go to the "Billing and Usage" tab in the Account Center to learn more and sign up for Budget Billing.

007608054574

Keep this portion for your records

Page 1 of 2



Return this portion with your check or money order and include your account number. If paying in person, please bring the bill.

Account Number

Due Date

Total Amount Due

12/02/2025

\$34.78



Amount Enclosed: \$_____

To update your mailing address or donate to energy assistance check here and complete the form on the back.

MARY CAMPBELL

ATMOS ENERGY

PO Box 740353

Cincinnati Ohio 45274-0353

HELP YOUR NEIGHBORS STAY WARM



When you donate to Atmos Energy's Sharing the Warmth program, you help families and the elderly stay warm and secure.

How to donate:

- Online at www.atmosenergy.com/share
- Or check off your voluntary donation amount on the back of this bill.
- Or call 888.286.6700 to speak with a Customer Support Representative.

atmosenergy.com/share

Your Billing Detail Information:

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
	10/15/25	11/13/25	6961	6969
	Read Difference:			8.00
	Actual Usage in CCF:			8.00

Your Charges:

PREVIOUS BALANCE	26.06
Payment Received 11/05/2025	-16.06
CURRENT GAS CHARGE TOTAL	32.15
RESIDENTIAL	
Customer Charge	25.00
Distribution Charge 8.000 @ 0.15625 / CCF	1.25
Gas Cost Charge @ 0.54034 / CCF	4.32
School Fee @ 0.03	0.96
Franchise Fee @ 0.02	0.62
TAX/FEE CHARGE TOTAL	1.97
State Sales Tax @ 0.06000	1.97
OTHER CHARGE/CREDIT TOTAL	-9.34
PRP Charge - Volumetric	0.66
Courtesy Adjustment 10/24/25	-10.00
CURRENT CHARGES	24.78

TOTAL AMOUNT DUE	\$34.78
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Want to learn more about your gas bill?

Use the Bill Comparison Tool to discover how the weather, billing days, and charges impact your bill month to month. Login to your Account Center and select Billing and Usage to find the Bill Comparison Tool.

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CHANGE OF MAILING ADDRESS:

Address/P.O. Box

City, State, Zip Code

Telephone Number

Cell Phone Number

To change account name, please call 1-888-286-6700

*Attention Colorado Customers: Your account number, name, and address will be shared with Energy Outreach Colorado for tax reporting purposes only. Your information will be kept secure and confidential and will not be used for other purposes.

Help Your Neighbors in Need. Contribute to Sharing the Warmth

You can help the elderly, the disabled and families in need keep their homes warm and secure by donating to Atmos Energy's Sharing the Warmth program.

All donations are distributed to a local area non-profit energy assistance agency(s) that serves your community.* Visit www.atmosenergy.com/share to find agencies near you.

Please indicate the contribution amount below to be billed monthly on your Atmos Energy statement.

Thank you for sharing the warmth with those in need in your community.

☐	\$1	☐	\$20
☐	\$5	☐	Other
☐	\$10	☐	Round-up
☐	One-time Contribution		



Account Number: [REDACTED]

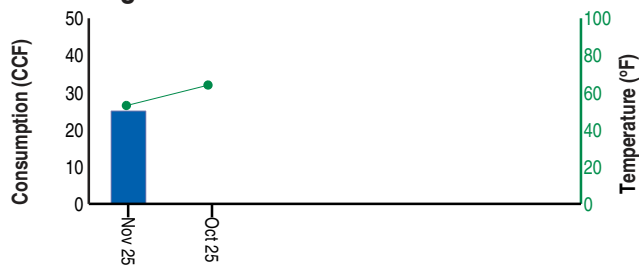
Customer Name: MARY CAMPBELL

Service Address: [REDACTED]

DUE DATE
12/03/25TOTAL DUE
\$46.69

TO BE DRAFTED ON 12/03/2025

Gas Usage Trend



Account Summary

Billing Date: 11/14/25

Previous Balance	25.99
Payment(s)	-14.99
Past Due Balance	11.00 ACTION REQUIRED
Current Charges	35.69

Past Due Balance:	\$11.00
Current Charges:	\$35.69

(see reverse for billing details)

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SO YOUR WINTER GAS BILLS ARE MORE PREDICTABLE

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Keep this portion for your records

Page 1 of 2



Return this portion with your check or money order and include your account number. If paying in person, please bring the bill.

Account Number

Due Date

Total Amount Due

12/03/2025

\$46.69



Amount Enclosed: \$_____

To update your mailing address or donate to energy assistance check here and complete the form on the back.

MARY CAMPBELL

ATMOS ENERGY
PO Box 740353
Cincinnati Ohio 45274-0353

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atmosenergy.com/share

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Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
	10/17/25	11/14/25	1266	1291
	Read Difference:			25.00
	Actual Usage in CCF:			25.00

Your Charges:

PREVIOUS BALANCE	25.99
Payment Received 11/05/2025	-14.99
CURRENT GAS CHARGE TOTAL	44.64
RESIDENTIAL	
Customer Charge	25.00
Distribution Charge 25.000 @ 0.1552 / CCF	3.88
Gas Cost Charge @ 0.54034 / CCF	13.51
School Fee @ 0.03	1.36
Franchise Fee @ 0.02	0.89
OTHER CHARGE/CREDIT TOTAL	-8.95
PRP Charge - Volumetric	2.05
Courtesy Adjustment 10/29/25	-11.00
CURRENT CHARGES	35.69

TOTAL AMOUNT DUE	\$46.69
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☐	\$5	☐	Other
☐	\$10	☐	Round-up
☐	One-time Contribution		

PSC Consumer Inquiry System

10/24/2025

Complaint:	2025-01764	Entry Date:	10/24/2025	Closed Date:		Contact Type:	Hotline
Name:	Campbell, Mary	Utility:	Atmos Energy Corporation				
Address:	220 East Elm 317 South Main St. Marion, KY 42064	Utility Nbr:	6600	Location:	Residence		
County:	Crittenden	Utility Type:	Gas				
Home:		Reason:	Billing (Billing policies/practices) (none) (none)				
Fax:		Complaint referred by:					
Cell:	(270) 969-0653	Email:					
Contacted Utility?	☒	Spoke with:	Meagan				
Cust Relations: Failed To Correct Problem							
Utility Contact:	Kay Coomes	Contact's	(270) 929-2393				
Preliminary Description:	Other Contacts:						
billing							
Processor:	ROSEMARY						
See File	☐	Case Related	☐	Staff Referral	☐	Confidential	☐
Info Only	☐	Formal Forms	☐	Ref to Util	☒	Customer Satisfied	Yes ☐ No ☐

PSC Narratives:

Investigator: ROSEMARY

Date: 10/24/2025 12:10:53 PM

Customer has called about charges when she disconnects for seasonal. Customer states she does exactly what Atmos tells her to do so she is not charged for a whole month of service. Customer still gets billed for a whole month and "that is not right". There are two property involved and they are both in her name. Please research and contact customer to discuss.

Coomes, Kay

From: Coomes, Kay
Sent: Wednesday, October 29, 2025 9:04 AM
To: 'Tutt, Rosemary (PSC)'
Subject: RE: 2025_1764.pdf Campbell

Good morning, Rosemary:

Regarding Ms. Campbell's bill, our records show that we turned on her account on October 19th as per customer's request. When she was billed for October, Atmos Energy did charge her a full base rate of \$25.00. Atmos Energy does not prorate their base charge, so customer was assessed the full amount from October 19th to current October bill date.

Our local supervisor, Rusty Honeycutt, has tried to reach Ms. Campbell every day this week, but has not been able to reach her.

If customer has any questions/concerns, she can contact Rusty at 270.836.7913

Thank you,
Kay Coomes

From: Tutt, Rosemary (PSC) <Rosemary.Tutt@ky.gov>
Sent: Friday, October 24, 2025 11:12 AM
To: Coomes, Kay <Kay.Coomes@atmosenergy.com>
Subject: [EXT] 2025_1764.pdf Campbell
Importance: High

CAUTION: Don't be quick to click. This e-mail originated from outside of Atmos Energy. Do not click links or open attachments unless you recognize the sender and know the content is safe.