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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)	
)	
Sarah Sperry, Complainant)	CASE NO.
)	
vs.)	2019-00138
)	
Atmos Energy Corporation, Defendant)	

**ATMOS ENERGY CORPORATION'S ANSWER
TO
THE COMPLAINT OF SARAH SPERRY**

Atmos Energy Corporation ("Atmos Energy") responds to the Complaint as follows:

1. Due to misreading of Ms. Sperry's meter by Atmos Energy and its contractor, Ms. Sperry was provided incorrect bills for her gas usage for the months of December 2018 – March 2019. Atmos Energy has corrected the errors leading to these mis-readings and provided Ms. Sperry with an accurate bill less all amounts she has already paid.
2. Consistent with 807 KAR 5:006 Section 11 (Bill Adjustment for Gas, Electric, or Water Utilities) and consistent with the Atmos Energy's Tariff (Rules and Regulations, Section 8(b), Original Sheet No. 71), upon determining that Ms. Sperry had been billed incorrectly, Atmos Energy determined the period during which the billing error existed and adjusted Ms. Sperry's bills. It was concluded that Ms. Sperry had been under-billed since November 28, 2018.
3. To correct a billing error over a period of months and bill a customer for actual usage, Atmos Energy uses a prior meter reading known to be correct, and then compares that meter reading to a current accurate meter reading. This allows Atmos Energy to establish the actual usage between those two time periods. Atmos Energy then adjusts for the usage that was actually billed, and the difference between those amounts (actual usage and billed usage) becomes the amount of the correction.

4. If actual usage exceeds billed usage, the customer is charged for the difference. If actual usage is less than billed usage, the customer receives a credit. Customers that had been overbilled received credits within the 30-day limit stated in the Atmos Energy's Tariff and in the Kentucky Administrative Regulations.
5. When adjusting Ms. Sperry's bill, Atmos Energy inadvertently took a then-current meter reading (March 27, 2019) from the duplex residence adjacent to Ms. Sperry. This resulted in an initial correction for Ms. Sperry that was still inaccurate. After further review, an accurate current meter reading was obtained from Ms. Sperry's meter and bill corrections were made to four of Ms. Sperry's bills corresponding to the time period from November 28, 2018 through March 27, 2019.¹ Also, in recognition of the Atmos Energy's error relating to Ms. Sperry's initial bill correction, Atmos Energy offered a credit of \$70 against her balance.²
6. For the aggregate period from November 28, 2018 through March 27, 2019, Ms. Sperry consumed the difference of the 4632 meter read on November 27, 2018 and the 5003 meter read on March 27, 2019. It is consistent with the Atmos Energy's Tariff and the Kentucky Administrative Regulations to bill Ms. Sperry for 371 ccf of natural gas consumption for that time period.³
7. These errors should not recur. Atmos Energy is in the process of installing a meter at Ms. Sperry's residence that can be read via wireless meter reading (WMR) which will obviate the need for future manual meter reading.⁴

¹ The four corrected bills were for the time periods of 11/28/18-12/27/18; 12/28/18-1/25/19; 1/26/19-2/25/19; and 2/26/19-3/27/19.

² \$70 dollars represents the then-effective base customer charge (\$17.50) for the four months that were adjusted.

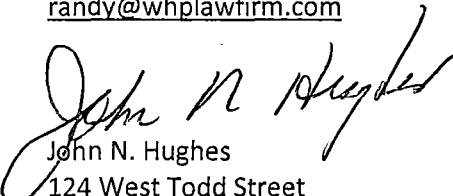
³ The meter adjacent to Ms. Sperry's residence showed a reading of 5243 on March 27, 2019, which initially caused the Company to believe it was appropriate to bill Ms. Sperry for 611 ccf of natural gas consumption.

⁴ Atmos Energy is in the process of completing the replacement of all of its residential meters in Kentucky with WMR meters.

8. Atmos Energy has, to the best of its knowledge and ability, rendered a bill for Ms. Sperry's actual usage during the time period in question, less any and all amounts already paid, consistent with its Commission-approved Tariff and the Kentucky Administrative Regulations.
9. Atmos Energy believes that the corrected bills, and the \$70 bill credit, satisfy the Complaint. Atmos Energy has offered to allow Ms. Sperry to pay the balance due in payments. This offer has been communicated to her attorney, but has not been accepted or rejected at this time.
10. Atmos Energy respectfully requests that the Commission refrain from taking further action in this Proceeding until such time as Ms. Sperry either accepts or rejects the Company's offer.

Respectfully submitted,

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Certificate of Service

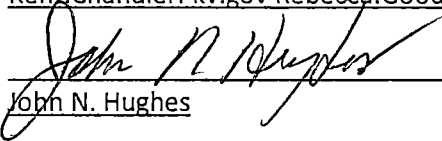
Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Ms. Gwen R. Pinson, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid on June 24 to:

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