

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

Sarah Sperry, Complainant

vs.

Atmos Energy Corporation, Defendant

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CASE NO.
2019-00138

**ATTORNEY GENERAL'S REPLY TO ATMOS' RESPONSE TO ATTORNEY
GENERAL'S MOTION FOR LEAVE TO FILE DATA REQUESTS
TO ATMOS ENERGY CORPORATION**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and hereby tenders the following Reply to Atmos' Response to the Attorney General's Motion for Leave to File Data Requests to Atmos Energy Corporation.

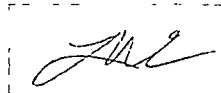
The Attorney General's tendered discovery will assist the Commission in determining the scope of the problems that occurred with the third-party contractor responsible for the errant meter readings. As the Attorney General has previously advised, another Atmos customer has filed a complaint with the Attorney General, with a fact pattern similar to Ms. Sperry's complaint. Moreover, Atmos itself has acknowledged that the scope of the problem apparently extends beyond a mere handful of customers,¹ yet the Company apparently remains unwilling to disclose the precise number of customers affected. This type of information needs to be brought forth and fully examined.

¹ See Atmos' Response to Attorney General's Initial Comments, June 5, 2019 ("Atmos has met with numerous affected customers as well as elected officials in these communities....").

Furthermore, Atmos itself has identified replacement of Ms. Sperry's meter with a new meter having wireless meter reading capability as a solution.² Indeed, Atmos noted that it is in the process of a system-wide residential meter replacement program.³ The Attorney General's tendered discovery will explore whether Atmos' meter replacement program can or will alleviate the problems of *all* affected customers, including Ms. Sperry, and if so, how. Therefore, the Attorney General's data requests will lead to the production of relevant information which Atmos itself has identified as curing the problems at issue.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion.

Respectfully submitted,
ANDY BESHEAR
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² See Atmos' Answer to the Complaint of Sarah Sperry, June 24, 2019, ¶ 7.

³ *Id.*, footnote 4 at page 2.

Certificate of Service and Filing

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, to:

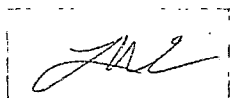
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This 11th day of July, 2019.



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