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August 6, 2021

Linda C. Bridwell PSC Executive Director Public Service Commission 211 Sower Blvd. Frankfort, KY 40601

> Re: Atmos Energy Corporation Case No. 2020-00085

Dear Ms. Bridwell:

Atmos Energy Corporation submits its motion for a temporary waiver of meter testing requirements. I certify that the electronic documents are true and correct copies of the original documents.

If you have any questions about this filing, please contact me.

Submitted By:

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And

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Attorneys for Atmos Energy Corporation

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

ELECTRONIC EMERGENCY DOCKET) RELATED TO THE NOVEL CORONAVIRUS) CASE No. 2020-00085 COVID-19

ATMOS ENERGY CORPORATION'S MOTION FOR TEMPORARY WAIVER OF METER TESTING REQUIREMENTS PURSUANT TO THE KENTUCKY PUBLIC SERVICE COMMISSION'S ORDER OF JULY 22, 2021

Now comes Atmos Energy Corporation ("Company"), by counsel, pursuant to the Commission's Order of July 22, 2021 ("Order") in the above-captioned docket and moves for an order from the Kentucky Public Service Commission ("Commission") to grant it temporary waiver from the meter testing requirements

1. In the Order, the Commission found that "beginning August 16, 2021, utilities, as applicable, shall resume the annual reporting and testing required by meter testing and inspection deviation plans approved by the Commission."¹

2. The Company usually prepares its meter sampling program during the winter season. The actual collection and testing of meters does not typically occur until closer to spring, with each year's meter collection typically wrapping up by the end of September.

3. To remove and test a meter, it is necessary to temporarily stop the flow of gas to a customer.² It is then also necessary to enter a customer's premises to conduct a pressure test on customer piping then relight appliances and equipment. The reason that meters are removed for

¹ Order at 3 (Ky. PSC July 22, 2021).

² The Company is describing the testing process for smaller meters typically used to serve residential and commercial customers. Large volume meters are tested differently and the Company never suspended its large meter testing program.

testing in warmer months is that it is not desirable to temporarily stop the flow of gas to customers in colder weather.

4. With a start date of August 16, 2021, the Company estimates that it would only be able to pull and test 5%-10% of the meters that it would typically sample in a "normal" calendar year before it would conclude meter sampling activity for 2021 due to cold weather, which would not yield enough meters to calculate statistically significant results.

5. Atmos Energy is an essential service provider and seeks to limit interactions between employees and customers. Requiring the resumption of the meter testing program at this time would unnecessarily increase human interaction and could result in additional spread of the coronavirus.

WHEREFORE, for the reasons stated herein, Atmos Energy Corporation moves for the issuance of an order extending its waiver of the meter testing requirements until the end of the upcoming winter season on April 1, 2022.

Respectfully submitted this 6th day of August, 2021.

John M. Huger

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CERTIFICATE

In accordance with the requirements of 807 KAR 5:001, I certify that this electronic filing is a true and accurate copy of the documents; that the electronic filing has been transmitted to the Commission on August 6, 2021 and that no party has been excused from participation by electronic means.

John N. Hugher

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