

**ATMOS ENERGY CORPORATION**

**VIA ELECTRONIC MAIL**

**October 8, 2020**

Mr. Kent Chandler  
Acting Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
PO Box 615  
Frankfort, Kentucky 40602

RE: Petition for Clarification and Deviation and Request for Expedited Treatment – Case No. 2020-00085

Dear Vice-Chairman Chandler:

Atmos Energy submits the accompanying Petition for Clarification and Deviation and Request for Expedited Treatment in connection with the Commission's recent Orders regarding the creation of default installment plans. Atmos Energy is asking for permission to make minor modifications to the requirements due to technical limitations.

Please feel free to contact me at 214.906.9827 if you have any questions and/or need any additional information.

Sincerely,

A handwritten signature in black ink that reads "Kevin C. Frank". The signature is written in a cursive style with a large initial "K" and a stylized "F".

Kevin C. Frank  
Senior Attorney  
Atmos Energy Corporation

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

**In the Matter of:**

<b>ELECTRONIC EMERGENCY</b>	)	
<b>DOCKET RELATED TO THE</b>	)	<b>CASE NO. 2020-00085</b>
<b>NOVEL CORONAVIRUS COVID-19</b>	)	

**ATMOS ENERGY CORPORAION PETITION FOR CLARIFICATION AND  
DEVIATION AND REQUEST FOR EXPEDITED TREATMENT**

Atmos Energy Corporation (“Atmos Energy” or “Company”) respectfully request clarification of, and deviations from, the Kentucky Public Service Commission’s (“Commission”) September 21, 2020 Order and the Commission’s September 30, 2020 Order in this proceeding (collectively “Orders”). The Company’s proposal below concerning how to address customer arrearages is an effort to implement the intent of the Orders consistent with what is feasible for the Company’s existing billing and dunning systems and practices. It is also consistent with aspects of the proposal of Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU”) filed in this proceeding on October 2, 2020.

1. Similar to LG&E and KU, there are technological and practical constraints that will not permit the Company to implement the Orders’ requirements as stated, particularly on a tight timeframe. For example, the Company’s billing system is not configured to permit more than one installment plan per customer, making it infeasible to create a separate installment plan for COVID-period arrearages versus prior or subsequent arrearages. Also, for customers whose pre-COVID-period arrearages are included in a new default installment plan, it is not feasible to automatically extend the default period to account for the period over which the customer accumulated the pre-COVID-period arrearage.

2. For customers who have arrearages solely relating to the period between March 16, 2020 and October 1, 2020, the Company can and will move those customers to a default seven-month installment plan no later than the billing cycle beginning October 20, 2020.

3. However, for customers with arrearages from prior to March 16, 2020, it is not feasible for the Company to move them *en masse* to an installment plan with a variable duration of seven months plus the months over which their prior arrearage was incurred. For these customers, the Company proposes to move them to a default 12-month installment plan no later than the billing cycle beginning October 20, 2020.

4. Consistent with the Commission's September 30, 2020 Order, customers who have contacted the Company and selected alternative installment plans will be left on those installment plans. Also, customers will be free to move to the default installment plan, should they so choose.

**WHEREFORE**, for the reasons stated herein, Atmos Energy Corporation respectfully requests clarification of, and deviations from, the Commission's Orders as above stated. To effectuate the Commission's Orders and provide necessary communications to customers, the Company respectfully requests expedited treatment of this petition.

Dated: October 8, 2020

Respectfully submitted,

*Mark R. Hutchinson*

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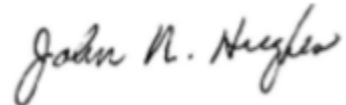
*John N. Hughes*

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Attorneys for Atmos Energy Corporation

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on October 8, 2020; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and the original filing in paper medium will be delivered to the Commission pending further instruction from Case No. 2020-00085:

A handwritten signature in black ink that reads "John N. Hughes". The signature is written in a cursive style with a large initial 'J' and 'H'.

John N. Hughes

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