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November 4, 2021

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

Re: Atmos Energy Corporation  
Case No. 2021-00214

Dear Ms. Bridwell:

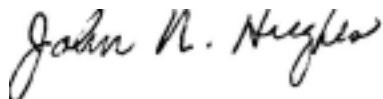
Atmos Energy Corporation submits its responses to Staff's Fourth Data Request. I certify that the electronic documents are true and correct copies of the original documents and that no party has been excused from electronic service.

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

Submitted By:

Mark R. Hutchinson  
Wilson, Hutchinson and Littlepage  
611 Frederica St.  
Owensboro, KY 42301  
270 926 5011  
[randy@whplawfirm.com](mailto:randy@whplawfirm.com)

And



John N. Hughes  
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Attorneys for Atmos Energy Corporation


COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF )  
RATE APPLICATION OF ) Case No. 2021-00214  
ATMOS ENERGY CORPORATION )

CERTIFICATE AND AFFIDAVIT

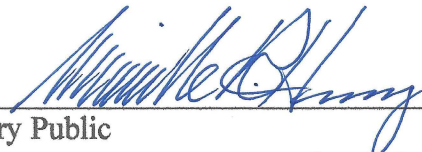
The Affiant, Joe T. Christian, being duly sworn, deposes and states that the attached responses to Commission Staff's fourth request for information are true and correct to the best of his knowledge and belief.



Joe T. Christian

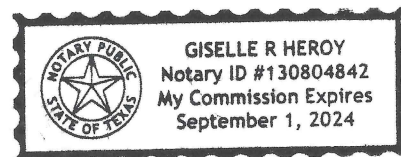
STATE OF TEXAS  
COUNTY OF DALLAS

SUBSCRIBED AND SWORN to before me by Joe T. Christian on this the 28<sup>th</sup> day of October, 2021.



Notary Public

My Commission Expires: 9/01/2024



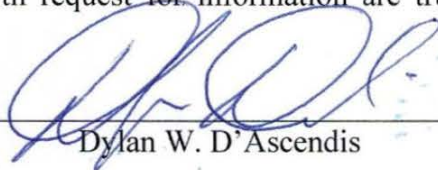
COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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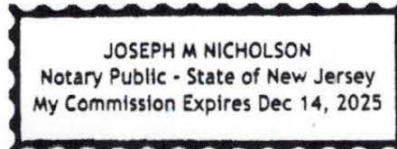
CERTIFICATE AND AFFIDAVIT

The Affiant, Dylan W. D'Ascendis, being duly sworn, deposes and states that the attached responses to Commission Staff's fourth request for information are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Dylan W. D'Ascendis

STATE OF NEW JERSEY  
COUNTY OF BURLINGTON

SUBSCRIBED AND SWORN to before me by Dylan W. D'Ascendis on this the 1  
day of November, 2021.



  
\_\_\_\_\_  
Notary Public  
My Commission Expires: 12/14/25

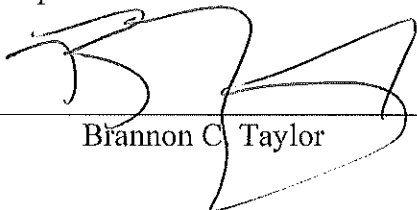
COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF )  
RATE APPLICATION OF ) Case No. 2021-00214  
ATMOS ENERGY CORPORATION )

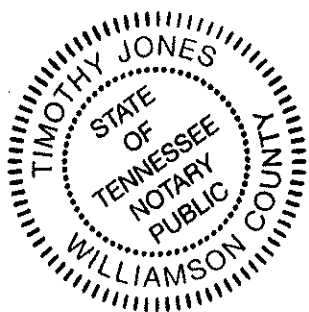
CERTIFICATE AND AFFIDAVIT


The Affiant, Brannon C. Taylor, being duly sworn, deposes and states that the attached responses to Commission Staff's fourth request for information are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Brannon C. Taylor

STATE OF TENNESSEE  
COUNTY OF WILLIAMSON

SUBSCRIBED AND SWORN to before me by Brannon C. Taylor on this the 28<sup>th</sup> day of October, 2021.



  
\_\_\_\_\_  
Notary Public  
My Commission Expires: 9-18-2022

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**Staff DR Set No. 4**  
**Question No. 4-01**  
**Page 1 of 2**

**REQUEST:**

Refer to Atmos's response to Commission Staff's Third Request for Information (Staff's Third Request), Item 11, Attachment 1, page 1 of 7.

- a. Provide an updated version of this page with footnotes 3 and 4 included.
- b. Explain why the average time to complete a seasonal reconnect is longer than the average time to complete a delinquent service reconnect.
- c. Explain the reasoning for having a separate charge for seasonal reconnects.
- d. Explain how it is reasonable for the seasonal charge amount to be \$20 over the total cost to perform a seasonal reconnect.

**RESPONSE:**

- a. Please see Attachment 1.

Footnote 3 states "Each work order task duration is reviewed periodically to make sure time allocated by the dispatching tool provides a practical amount of time for technicians to perform each task. An average of actual historic task duration captured in mobile data order completions are used to calibrate the values."

Footnote 4 states "Seasonal Charge assumes 10 minutes for the initial turn-off and 30 minutes for the subsequent reconnect."

- b. Seasonal Charge assumes 10 minutes for the initial turn-off and 30 minutes for the subsequent reconnect. For a delinquent service reconnect the meter is already off.
- c. See the response to subpart (b).
- d. A seasonal charge that is \$20 over the total cost to perform is reasonable because seasonal customers typically terminate their service in April/May and reconnect in October/November. As a result of this voluntary customer behavior, this set of customers avoid paying four to five months of the tariffed base charge (G-1 currently \$19.30 per month). The \$20 does not cover the entire amount of avoided base charge; however, it does provide a level of deterrence to customers that drive costs through their voluntary actions.

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**Staff DR Set No. 4**  
**Question No. 4-01**  
**Page 2 of 2**

ATTACHMENT:

ATTACHMENT 1 - Staff\_4-01\_Att1 - Special Charges Analysis.xls, 7 Pages.

Respondent: Brannon Taylor

Atmos Energy- Kentucky  
Special Service Charge Analysis

Line No.	Description	3 Year Average # Orders Billed <sup>2</sup>	Average Time To Complete (Minutes) <sup>3</sup>	Sr. Service Technician Salary & Load Per Minute 0.63	Office Salary & Load Per Minute 0.03	Supervision Salary & Load Per Minute 0.11	Total Salary Load Per Order	Travel Cost Between Orders	Service Cost Per Order	CSC Preparation and Processing of Order	Total Cost To Perform	Current Rates
1	Meter Sets	2,534	45	\$28.35		\$4.80	\$33.15	\$10.84	\$43.98	\$3.11	\$47.10	\$34.00
2	Turn On	12,016	35	\$22.05		\$3.73	\$25.78	\$10.84	\$36.62	\$3.11	\$39.73	\$23.00
3	Reconnect Delinquent Service	3,656	30	\$18.90	\$ 0.83	\$3.20	\$22.93	\$10.84	\$33.77	\$3.11	\$36.88	\$39.00
4	<sup>4</sup> Seasonal Charge	258	40	\$25.20		\$4.27	\$29.47	\$10.84	\$40.30	\$3.11	\$43.41	\$65.00
5	Read	12,409	10	\$6.30		\$1.07	\$7.37	\$10.84	\$18.20	\$3.11	\$21.31	\$12.00
6	<sup>1</sup> Meter Test Charge	-	30	\$18.90		\$3.20	\$22.10	\$10.84	\$32.93	\$3.11	\$36.05	\$20.00
7	Return Check Charges	3,189									\$ 35.60	\$25.00
8	Totals											

Notes:

<sup>1</sup>Meter Test Charge - This charge was intended to cover the cost of testing a meter should the customer dispute such meter's accuracy. There have been 0 occurrences of such charge being billed.

<sup>2</sup>Company used a 3 year average of orders billed for this analysis. Specifically, we used the 12 month time periods ending March 2018, March 2019, and March 2020.

<sup>3</sup>Each work order task duration is reviewed periodically to make sure time allocated by the dispatching tool provides a practical amount of time for technicians to perform each task. An average of actual historic task duration captured in mobile data order completions are used to calibrate the values.

<sup>4</sup>Seasonal Charge assumes 10 minutes for the initial turn-off and 30 minutes for the subsequent reconnect.

**Atmos Energy Kentucky Division  
Computation of Senior Service Tech Costs per Minute**

<b>Line No.</b>	<b>Description</b>	<b>All Field Service Personnel</b>
	<b>(1)</b>	<b>(2)</b>
1	FY 2021 Mid-Point of Senior Service Tech pay grade NEX4	27.10
2	Times FY 2021 Benefits and Payroll Tax Loading Factor	<u>1.3949</u>
3	Average Salary per Employee w\Benefits	37.80
4	Divided by 60 Minutes per Hour	60
5	Employee Cost per Minute	<u><u>0.63</u></u>



**Atmos Energy Kentucky Division  
Computation of Office Assistant (OA) Costs per Minute**

<b>Line No.</b>	<b>Description</b>	<b>All Field Office Assistants</b>
(1)		(2)
1	FY 2021 Mid-Point of Office Assistants (OA) pay grade NEX3	23.83
2	Times FY 2021 Benefits and Payroll Tax Loading Factor	<u>1.3949</u>
3	Average Salary per Employee w\Benefits	33.24
4	Divided by 60 Minutes per Hour	60
5	Employee Cost per Minute	<u><u>0.55</u></u>
6	Times .05 of OA's Time on Reconnect Delinquent Service Orders	0.03

**Atmos Energy Kentucky Division  
Computation of Operations Supervisor Costs per Minute**

<b>Line No.</b>	<b>Description</b>	<b>All Field Service Personnel</b>
(1)		(2)
1	FY 2021 Mid-Point of Operations Supervisor pay grade 5	45.87
2	Times FY 2021 Benefits and Payroll Tax Loading Factor	<u>1.3949</u>
3	Average Salary per Employee w\Benefits	63.98
4	Divided by 60 Minutes per Hour	60
5	Employee Cost per Minute	<u><u>1.07</u></u>
6	Times .10 of Supervisors Time spent on SOs	0.11

**Atmos Energy Kentucky Division  
Travel Cost  
Between Orders**

<b>Line No.</b>	<b>Description</b>	<b>All Field Service Personnel</b>
(1)		(2)
1	Estimated Average Speed (Miles per Hour)	25.00
2	Minutes per Mile <sup>1</sup>	2.40
3	Miles Between Orders	5.23
4	Minutes Between Orders	12.55
5	Loaded Salary per Minute	0.63
6	Employee Travel Cost per Order	7.91
7	Vehicle Cost per Mile <sup>2</sup>	0.56
8	Vehicle Cost per Order	2.93
9	Total Cost to Arrive	<u>10.84</u>

<sup>1</sup> Minutes Divided by 25 Mph

<sup>2</sup> IRS Rate for Expenses of Operating a Vehicle as of 01/01/2021

**Atmos Energy - Kentucky Division  
Returned Check Charge  
Survey of Banks - September 9, 2021**

<b>Line No.</b>	<b>Bank</b>	<b>CHARGE</b>
	<b>(1)</b>	<b>(2)</b>
1	Bank of America	\$ 35.00
2	Chase Bank	\$ 34.00
3	Regions	\$ 36.00
4	Fifth Third Bank	\$ 37.00
5	Branch Banking & Trust (BB&T)	\$ 36.00
6	<b>Average Return Check Charge</b>	<b>\$ 35.60</b>

**Atmos Energy - Kentucky Division**  
**3 Year Average (FY18 - FY 20)**  
**Customer Support Center**

<u>Line No.</u>		FY 2018	FY 2019	FY 2020`
1	Total Enterprise Calls (including IVR handled calls)	7,697,397	7,773,918	7,531,456
2	Total O&M Cost Contact Center	\$ 22,962,656	\$ 24,345,742	\$ 24,233,016
3	Cost Per Call	\$2.98	\$3.13	\$3.22
4	3 Year Average	\$3.11		

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**Staff DR Set No. 4**  
**Question No. 4-02**  
**Page 1 of 1**

**REQUEST:**

Refer to Atmos's response to Staff's Third Request, Item 11, Attachment 1, page 6 of 7.

- a. Explain whether Atmos has accounts in which customer payments are deposited at all of the banks listed on this page. If not, explain at which banks Atmos does have accounts in which customer payments are deposited.
- b. Provide documentation from the banks supporting the amounts listed on this page.

**RESPONSE:**

- a. Customer payments sent to the Company's lockbox are deposited at Fifth Third Bank. Electronically posted customer payments are deposited at Amarillo National Bank.
- b. Please see Attachment 1.

**ATTACHMENT:**

ATTACHMENT 1 - Staff\_4-02\_Att1 - Bank Return Check Charges.pdf, 15 Pages.

Respondent: Brannon Taylor

# Understanding Bank of America Interest Checking®

## An overview of key policies and fees

Your Interest Checking account		
Monthly Maintenance fee	<b>\$25.00</b> each month	You can avoid the <b>Monthly Maintenance fee</b> when you maintain combined balances of \$10,000 or more each statement cycle. Combined balances include:  Average daily balances for the statement cycle in linked checking, savings and money market savings accounts, <b>AND</b>  The current balances, as of the end of the checking statement cycle in linked personal CDs and IRAs, <b>AND</b>  The current balance, as of two business days before the end of the checking statement cycle, in your eligible linked Merrill Lynch investment accounts.
ATM fees		
Bank of America® ATMs	<b>No ATM fee</b>	For deposits, withdrawals, transfers or balance inquiries
Non-Bank of America ATMs	<b>\$2.50</b> <b>\$5.00</b>	In the U.S., plus any fee charged by the ATM's operator Outside the U.S., plus any fee charged by the ATM's operator
Overdraft policy		
<ul style="list-style-type: none"> <li>To help you avoid fees, we won't authorize ATM withdrawals or everyday debit card purchases when you don't have enough money in your account</li> <li>We offer two overdraft setting options for how you want us to process your other transactions, such as checks and scheduled payments</li> </ul>		
Overdraft settings and fees		
<b>Option 1: Standard</b>	<b>\$35.00</b> per overdraft or declined/returned transaction	We may approve checks or scheduled payments that cause an overdraft. Use this setting if you want transactions to be completed, even though you'll pay a fee. You pay a \$35 Overdraft Item fee for each payment that we authorize and pay, or a \$35 NSF: Returned Item fee for each one that we decline or return unpaid. There's no NSF: Returned Item fee for one-time or recurring declined debit card payments. However, an Overdraft Item fee can apply to a recurring debit card payment. No more than 4 Overdraft or Returned Item fees are charged per day.
<b>Option 2: Decline-All</b>	<b>\$35.00</b> per declined/returned transaction	We won't authorize any transactions that will cause an overdraft. You pay a \$35 NSF: Returned Item fee for each transaction that we decline or return unpaid. There's no NSF: Returned Item fee for declined debit card payments. No more than 4 Returned Item fees are charged per day.
Emergency cash at the ATM	<b>\$35.00</b> per overdraft transaction	You may be able to authorize an overdraft and access cash at a Bank of America ATM. You'll pay a \$35 Overdraft Item fee for the ATM withdrawal unless you deposit money to cover your overdraft by the end of the business day.
Extended Overdrawn Balance charge	<b>\$35.00</b>	Additional fee when your account stays overdrawn for 5 consecutive business days (excludes Saturday and Sunday).
Overdraft Protection <sup>1</sup> transfer fee	<b>\$12.00</b> per transfer	With Overdraft Protection, if you're about to overdraw your account, we'll automatically transfer available funds from your linked savings or second eligible checking account. Only 1 transfer fee charged per day. <b>Transfer fee waived for transfers from savings or second eligible checking account.</b>

This Clarity Statement summarizes key policies and fees for this account. For more information about the terms that govern your account, please review your Personal Schedule of Fees and Deposit Agreement.

1. Overdraft Protection is also available from your Bank of America credit card. Overdraft Protection transfers from your credit card are Bank Cash Advances. They are subject to overdraft protection cash advance fees and will accrue interest at the Bank Cash Advance APR. Please refer to your Credit Card Agreement for additional details.  
Information is current as of 11/2015 and is subject to change. See reverse

**Additional fees**

Statement copies (each)	<b>WAIVED \$5.00</b>	You can view and print your available statements in the Statements & Documents tab in Online Banking instead of ordering a copy from us.
Check images	<b>\$3.00</b>	For each monthly statement that includes a printed check image
	<b>No fee</b>	Printable check images from the last 18 months are available online
Ordering checks	<b>Varies</b>	No fee on standard styles and discounts on certain styles
Card replacement	<b>WAIVED \$5.00</b>	For an ATM or debit card when your card has not expired; <b>\$15</b> rush delivery waived as well
Stop payment	<b>WAIVED \$30.00</b>	Each request
Cashier's checks	<b>WAIVED \$10.00</b>	Per check
Incoming wire transfers (each)	<b>WAIVED \$15.00</b>	Domestic wire transfer
	<b>\$16.00</b>	Foreign wire transfer; other banks may charge additional fees.
Outgoing wire transfers (each)	<b>\$30.00</b>	Domestic wire transfer
	<b>\$35.00</b>	Foreign wire transfer sent in foreign currency; other banks may charge additional fees.
	<b>\$45.00</b>	Foreign wire transfer sent in U.S. Dollars; other banks may charge additional fees.
Deposited item returned (each)	<b>\$12.00</b>	Domestic item
	<b>\$15.00</b>	Foreign item
Non-Bank of America Teller Withdrawal	Per transaction, greater of <b>\$5.00</b> or <b>3%</b> of the amount (maximum \$10.00) when you use your ATM or debit card, or card number, to make a withdrawal, transfer or payment at another bank and it is processed as a cash disbursement	

**When your deposits are available**

- Cash, direct deposits, wire transfers: On the day we receive them.
- Checks: Usually the next business day, if deposited before the financial center or ATM cut-off time.
- Mobile Check Deposit: Usually the next business day, if deposited by applicable cut-off times (please refer to Help in Mobile App). Dollar limits apply to this service, vary by account and are communicated during the deposit process. Items you can't deposit using this service include: U.S. Savings Bonds, checks from foreign banks, money orders, travelers checks and image replacement documents.
- If we place a hold on your deposit, we'll let you know the hold reason and when funds will be available for you to use. This is typically provided at the time of deposit but may also be mailed later. Deposits greater than \$5,000 and checks deposited within the first 30 days of account opening may be held longer.

**How we post transactions**

The way we post transactions impacts your account balance. If there's not enough available money in your account to cover all of your transactions, the posting order can impact the number of overdraft fees you incur. After each business day ends, we'll group transactions received that day into categories before posting them. We show below the most common categories, and common types of transactions within each of them. We generally post transactions in the order shown below.

- **Deposits:** Added from highest to lowest dollar amount.
- **Many debit transactions:** Subtracted based on the date and time you made them (if the system knows the date and time of the transaction). These include one-time and recurring debit card transactions, one-time transfers, ATM withdrawals, and checks cashed with our tellers.\*
- **Other checks you wrote:** Subtracted in check number order.\*
- **Most other electronic payments and preauthorized transfers:** Subtracted from highest to lowest dollar amount. These include scheduled transfers, online bill payments and preauthorized payments that use your account number.
- **Most fees:** Subtracted from highest to lowest dollar amounts.

\* If our system doesn't receive date and time information, or can't detect the check number, remaining transactions in these categories are posted from highest to lowest dollar amount.

**Get started with your account**

Open this account with \$100 or more. Visit [bankofamerica.com/quickstart](http://bankofamerica.com/quickstart) to make sure you're taking advantage of your new account, including signing up for online banking.

Questions? Please call **1.800.432.1000** or visit a nearby financial center.

Additional fee waivers may be available to U.S. Trust® and qualified Merrill Lynch Wealth Management® clients. Please contact your advisor to learn more.

Merrill Edge and Merrill Lynch Wealth Management makes available products and services offered by Merrill Lynch, Pierce, Fenner & Smith Incorporated ("MLPF&S") and other subsidiaries of BAC.

Investment products:

**Are Not FDIC Insured | Are Not Bank Guaranteed | May Lose Value**

Banking products are provided by Bank of America, N.A. and affiliated banks, Members FDIC and wholly owned subsidiaries of BAC





## Overdraft and Overdraft Fee Information for Your Chase Checking Account

### What You Need to Know About Overdrafts and Overdraft Fees

An overdraft occurs when you do not have enough money in your account to cover a transaction, but we pay it anyway. We pay overdrafts at our discretion, which means we do not guarantee that we will always authorize or pay any type of transaction. If we do not authorize and pay an overdraft, your transaction will be declined or returned. We can cover your overdrafts in three different ways:

1. We have Standard Overdraft Practices that come with your account.
2. We offer Overdraft Protection through a link to a Chase savings account, which may be less expensive than our Standard Overdraft Practices. You can contact us to learn more.
3. We also offer Chase Debit Card Coverage, which allows you to choose how we treat your everyday debit card transactions, in addition to our Standard Overdraft Practices.

This notice explains our Standard Overdraft Practice and Chase Debit Card Coverage.

- **What are the Standard Overdraft Practices that come with my account?**

We **do** authorize and pay overdrafts for the following types of transactions:

- Checks and other transactions made using your checking account number
- Recurring debit card transactions

- **What is Chase Debit Card Coverage?**

We **will only** authorize and pay overdrafts in addition to our Standard Overdraft Practice for the following types of transactions if you specifically ask us to:

- Everyday debit card transactions

- **What fees will I be charged if Chase pays my overdraft?**

If we pay an item, we'll charge you a \$34 Insufficient Funds Fee per item if your account balance is overdrawn by more than \$50 at the end of the business day (maximum of 3 fees per day, for a total of \$102).

- We won't charge an Insufficient Funds Fee if your account balance is overdrawn by \$50 or less at the end of the business day.
- We won't charge for item(s) that are \$5 or less, even if your account balance is overdrawn by more than \$50 at the end of the business day.
- We won't charge an Insufficient Funds Fee if your available balance was sufficient at the time your debit card transaction was authorized, even if your account balance is overdrawn at the time the transaction is presented for payment.
- For Chase Sapphire<sup>SM</sup> Checking and Chase Private Client Checking<sup>SM</sup> accounts, there are no Insufficient Funds Fees when item(s) are presented against an account with insufficient funds on the first four business days during the current and prior 12 statement periods. On a business day when we returned item(s), this counts toward the four business days when an Insufficient Funds Fee will not be charged.

- **What if I want Chase to authorize and pay overdrafts on my everyday debit card transactions?**

If you or a joint account owner would like to change your selection, sign in to [chase.com](https://chase.com) to update your account settings, or call us at 1-800-935-9935 (or collect at 1-713-262-1679 if outside the U.S.), or visit a Chase branch. We accept operator relay calls.

# What You Need to Know About Overdrafts and Overdraft Fees

An overdraft occurs when you do not have sufficient available funds in your account to cover a transaction, but we pay it anyway. We can cover your overdrafts in the following ways:

1. We have Standard Overdraft Coverage that comes with your account.
2. We offer Regions Overdraft Protection plans, such as a link to a money market account, savings account, line of credit or credit card, which may be less expensive than our Standard Overdraft Coverage. To learn more, ask your Regions banker about these plans or visit [www.regions.com/coverage](http://www.regions.com/coverage). Customers who have Regions Overdraft Protection may also be covered by Standard Overdraft Coverage in the event linked account funds are exhausted.

This notice explains our Standard Overdraft Coverage.

## ➤ What is the Standard Overdraft Coverage that comes with my account?

We do authorize and pay overdrafts for the following types of transactions:

- Checks and other transactions made using your checking account number
- Automatic bill payments

We will not authorize and pay overdrafts for the following types of transactions unless you ask us to (see below):

- ATM transactions
- Everyday CheckCard transactions

We pay overdrafts at our discretion, which means we do not guarantee that we will always authorize and pay any type of transaction.

If we do not authorize and pay an overdraft, your transaction will be declined.

## ➤ What fees will I be charged if Regions pays my overdraft?

Under our Standard Overdraft Coverage:

- We will charge you a fee of \$36 each time we pay an overdraft.
- We will charge you a combined total of no more than five (5) paid overdraft item fees and returned item fees per day.

## ➤ What if I want Regions to authorize and pay overdrafts on my ATM and everyday CheckCard transactions?

If you want us to authorize and pay overdrafts on ATM and everyday CheckCard transactions through Standard Overdraft Coverage, please call 1-800-947-BANK (2265), visit your Regions branch, make an election at most Regions ATMs, speak to one of our designated customer service representatives to confirm your selection, return a response form if we mail it to you, or make your choice when opening an account. If you are a Regions Online Banking customer, you can make your selection by logging in and selecting View More Details on your Account Details page or selecting Manage Overdraft Coverage from the Customer Service menu.





# FIFTH THIRD OVERDRAFT SOLUTIONS FOR CONSUMERS

Fifth Third has a variety of solutions for those times when the funds in your account aren't enough to cover your purchases and payments.<sup>1</sup>

There are several ways to track your balance and avoid an overdraft situation.



Log on to 53.com or use the Fifth Third Mobile App



Enroll in Account Alerts<sup>2</sup>



Use one of our convenient Fifth Third ATMs



Call 1-800-972-3030

## Overdraft Coverage Options

	Overdraft Coverage	
	Allows payments and purchases to be made even when there is not enough money in your account.	
	Standard For checks and automatic bill payments	Optional For debit card <sup>3</sup> and ATM transactions
What is it?	Your checks and payments may be paid on your behalf when there aren't sufficient funds in your account.	<ul style="list-style-type: none"> <li>Your everyday debit card purchases and ATM withdrawals may be approved and paid even if you don't have enough money in your account.</li> <li>You must enroll in this service. When you choose not to opt-in for this coverage, your card transactions are automatically declined.</li> </ul>
What is the benefit?	Avoid returned checks and late payment charges from merchants and billers.	Avoid declined debit card and ATM transactions.
What's the cost?	\$37 per item Maximum of five overdraft fees charged per business day.	\$37 per item Maximum of five overdraft fees charged per business day.
How do you enroll?	No enrollment required. Consumer accounts (excluding Basic Checking and Express Banking) are automatically enrolled.	<ul style="list-style-type: none"> <li>Visit your local banking center</li> <li>Log into Online Banking</li> <li>Call us at (800) 972-3030</li> <li><i>Coverage not available for Basic Checking or Express Banking</i></li> </ul>

Note: Overdraft payments are discretionary and we reserve the right not to pay. For example, we typically do not pay overdrafts if your account is not in good standing, or if you are not making regular deposits, or if you have too many overdrafts. When an item is returned due to insufficient funds, you will be charged \$37.

## Our Simple Overdraft Fee Policy:

- No Daily/Extended Overdraft Fees: We charge an up-front fee — \$37 per item — when an item is paid by Overdraft Coverage or returned due to insufficient funds. We do not charge daily overdraft fees.
- If your account is overdrawn by \$5 or less at the end of the business day, we do not charge any per-item overdraft fees.
- See our *Deposit Account Rules & Regulations* for Funds Availability restrictions.

With Overdraft Protection, you can choose to use your savings account, secondary checking account, credit card, or line of credit to cover your transactions and avoid a negative balance.<sup>1</sup>

## Overdraft Protection Options

	Overdraft Protection	
	Uses money set aside in another account as a financial cushion to cover a negative balance.	
	Savings or Secondary Checking Account <sup>4,5</sup>	Credit Card or Line of Credit
What is it?	When you overdraw your account, funds from your savings or secondary checking account will be automatically transferred to cover your transactions.	<ul style="list-style-type: none"> <li>When you overdraw your account, funds from your Fifth Third credit card or line of credit will be automatically transferred to cover your transactions.</li> <li><b>For Credit Cards<sup>5</sup>:</b> The amount transferred will be subject to both the available cash advance limit and cash advance interest rate applicable to the card.</li> <li><b>For Lines of Credit<sup>6</sup>:</b> The amount transferred will be subject to the interest rate applicable to the line of credit.</li> </ul>
What is the benefit?	Avoid overdrafts and per-item overdraft fees.	Avoid overdrafts and per-item overdraft fees.
What's the cost?	\$12 per transfer <ul style="list-style-type: none"> <li>When you overdraw, the exact amount of the negative balance plus the \$12 transfer charge will be transferred the next business day.</li> <li>No transfer fee when your account is overdrawn by \$5 or less.</li> </ul>	\$12 per transfer <ul style="list-style-type: none"> <li>When you overdraw, the exact amount of the negative balance plus the \$12 transfer charge will be transferred the next business day.</li> <li>No transfer fee when your account is overdrawn by \$5 or less.</li> </ul>
How do you enroll?	Visit your local banking center	Visit your local banking center

Note: There are some limits on the types of accounts that can be linked to any account for Overdraft Protection transfers.

<sup>1</sup> Any debits to your account including writing checks, withdrawing money at the bank or ATM, ACH transactions, or other electronic means may result in your account being overdrawn and a fee being imposed.

<sup>2</sup> Mobile internet data and text messaging charges may apply. Please contact your mobile service provider for details.

<sup>3</sup> Everyday debit card purchases are defined as one-time debit card purchases and do not include recurring debit card payments which can be regularly scheduled electronic bill payments through your debit card account number.

<sup>4</sup> Minor-owned accounts, Goal Setter Savings accounts, and Secured Credit Cards cannot be used to provide Overdraft Protection.

<sup>5</sup> Lending subject to credit review and approval. A checking account can only have one account (the linked account) providing the Overdraft Protection. However, a savings, checking, Equity Flexline, or credit card account may provide Overdraft Protection to multiple checking accounts. In addition, the primary owner's name and TIN/SSN on the checking account on the linked Overdraft Protection account must be the same.

<sup>6</sup> New loan/line of credit applications are subject to credit review and approval.





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are. Open an account **Overdraft** protection You can choose to add on this service so those “oops” moments don’t turn into “oh no” events. Bypass the monthly maintenance fee<sup>1, 2</sup> Waive the monthly...

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#### FAQ

### [How do \*\*overdraft\*\* services and fees work?](#)

Overdraft services help make sure your transactions go through when you need them to. We have two options: Overdraft Protection<sup>1</sup> – Helps you avoid overdrafts by linking your checking account

## FAQ

2 questions

### ▾ **How do overdraft services and fees work?**

Overdraft services help make sure your transactions go through when you need them to. We have two options: Overdraft Protection<sup>1</sup> – Helps you avoid overdrafts by linking your checking account to another one of your Truist accounts.<sup>1</sup> There’s a \$12.50 transfer fee each day you use Overdraft Protection. But, you can avoid the fee if you transfer or deposit funds to cover your transactions by the daily cut-off time. Overdraft Coverage<sup>2</sup> – Allows us to pay ATM and one-time debit card transactions when your available balance can’t cover the transaction. You may be charged a \$36 fee for each overdraft

transaction—and can be charged up to six fees per day. Learn more about overdraft services and fees.

### › What is Overdraft Assurance?

## Products & Services 10 products

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- Supplier diversity
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- Community Reinvestment Act
- Investor relations
- Careers

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- Find a banker or advisor
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- Facts about banking
- Consumer payment relief hub
- Client emergency resources



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**Staff DR Set No. 4**  
**Question No. 4-03**  
**Page 1 of 1**

**REQUEST:**

Refer to Atmos's response to Staff's Third Request, Item 11, Attachment 1, page 7 of 7. Provide separately the 3-year average cost per call for customer service representative calls and the 3-year average cost per call for IVR handled calls. If this information cannot be provided separately, explain why.

**RESPONSE:**

The Company manages and tracks O&M cost categories (i.e. labor, telecom, etc.) via the use of cost centers. In this instance, costs associated with the Contact Center are tracked in cost center 1212 and viewed as total Contact Center expenditures. As result, costs have not and currently are not broken down between the two types of calls.

Respondents: Brannon Taylor and Joe Christian

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**Staff DR Set No. 4**  
**Question No. 4-04**  
**Page 1 of 1**

**REQUEST:**

Refer to Atmos's response to Staff's Third Request, Item 12. Explain how the customer's social security number and driver's license number are stripped out of the database and muted from every recorded call.

**RESPONSE:**

A batch program runs nightly to remove any information entered in the Social Security Number, Driver's License, and Driver's License State fields in CRM. Additionally, our NICE (Neptune Intelligence Computer Engineering) system is set up to automatically mute call recordings when sensitive personal information (SPI) or credit card numbers are mentioned.

Respondent: Brannon Taylor

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**Staff DR Set No. 4**  
**Question No. 4-05**  
**Page 1 of 1**

**REQUEST:**

Refer to Atmos's response to Staff's Third Request, Item 19b. The timing of the capital cost recovery is the primary purpose of the Pipeline Replacement Program (PRP). Explain why the more direct and rapid recovery of costs associated with the PRP would not benefit Atmos by increasing the certainty of capital cost recovery and reducing regulatory lag and company risk.

**RESPONSE:**

As noted in the Company's response to Staff DR No. 3-19, the Company's response to Staff's Second Request, Item 33 demonstrates that the risk associated with recovery of costs and capital in Atmos Energy's PRP is no more or less risky than the utility as a whole. Contrary to the premise of the question, there is no more direct or rapid recovery of costs associated with the PRP because the same depreciation lives associated with PRP investment are applicable to non-PRP investment. PRP costs are therefore recovered over the same life as non-PRP costs. The existence of a PRP tariff does provide a benefit to the Company through reduced lag and support of our credit health. However, there are also benefits to the customer, including more rapid replacement of vintage infrastructure than would otherwise be possible (safe service), a lower cost of financing through better borrowing terms and avoidance of traditional rate case expenses (affordable service) and the ability to raise additional external capital to fund the PRP investments (the ability to continue receiving safe and reliable service). In other words, the PRP tariff follows a concept sometimes referred to as "the regulatory compact" by striking the appropriate balance between the customer and the Company.

Please also see the Company's response to Staff DR No. 3-19 subparts (a) and (c), which illustrate that commissions shown in the attached have not distinguish return outcomes based on type of recovery.

Respondent: Joe Christian



**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**Staff DR Set No. 4**  
**Question No. 4-06**  
**Page 1 of 1**

**REQUEST:**

Refer to Atmos's response to Staff's Third Request, Item 19c, Attachment. Update the attachment with the year of the awarded return on equity.

**RESPONSE:**

Please see Attachment 1 with the requested information as well as the docket number associated with the referenced return on equity.

**ATTACHMENT:**

ATTACHMENT 1 - Staff\_4-06\_Att1 - Infrastructure ROEs.xlsx, 1 Page.

Respondents: Joe Christian and Dylan D'Ascendis

Gas Distribution Company	Parent	State	Base Case Authorized ROE	Infrastructure Mechanism	Infrastructure Mech Authorized ROE	Final Order Date	Base Rate / Infrastructure Order Reference
New Jersey Natural Gas Company	NJR	New Jersey	9.60%	Safety, Access, and Facility Enhancement (SAFE)	9.60%	11/13/2019	GR19030420
New Jersey Natural Gas Company	NJR	New Jersey	9.60%	NJ RISE	9.60%	11/13/2019	GR19030420
Kansas Gas Service Company	OGS	Kansas	[1]	Gas System Reliability Surcharge	[1]	2/5/2019	18-KGSG-560-RTS
Texas Gas Service Company	OGS	Texas	9.50%	Gas Reliability Infrastructure Program	9.50%	8/4/2020	GUD-10928
Elizabethtown Gas	SJI	New Jersey	9.60%	Infrastructure Investment Program	9.60%	11/13/2019	GR19040486
South Jersey Gas Company	SJI	New Jersey	9.60%	Accelerated Infrastructure Replacement Program	9.60%	9/23/2020	GR20030243
Alabama Gas Corporation (Spire Alabama)	SR	Alabama	NA	Accelerated Infrastructure Modernization (AIM) Program	10.15%-10.65%	10/25/2018	18046 and 18328
Mobile Gas Service Corporation (Spire Gulf Inc)	SR	Alabama	NA	Rate Stabilization and Equalization Plan; Cast Iron Main	10.45%-10.95%	9/12/2017	28101
Spire Missouri East	SR	Missouri	9.80%	Infrastructure System Replacement Surcharge	9.80%	2/21/2018	GR-2017-0215
Spire Missouri West	SR	Missouri	9.80%	Infrastructure System Replacement Surcharge	9.80%	2/21/2018	GR-2017-0215
Southwest Gas Corporation	SWX	California	10.00%	Infrastructure Reliability & Replacement Adjustment Mechanism	10.00%	3/25/2021	19-08-015
Southwest Gas Corporation	SWX	Nevada	9.25%	Gas Infrastructure Replacement Rate	9.25%	9/25/2020	20-02023
Atmos Energy	ATO	Colorado	9.45%	SSIR	9.45%	5/3/2018	17AL-0429G / 20AL-0471G
Atmos Energy	ATO	Kansas	9.10%	GSRS	9.10%	4/1/2020	19-ATMG-525-RTS
Atmos Energy	ATO	Kentucky	9.65%	PRP	9.65%	5/8/2019	2018-00281 / 2019-00253
Atmos Energy	ATO	Louisiana	[1]	N/A-RSC	[1]	7/1/2021	U-35525
Atmos Energy	ATO	Mississippi	[1]	SIR	[1]	11/1/2021	2005-UN-0503/2015-UN-049
Atmos Energy	ATO	Tennessee	9.80%	ARM	9.80%	5/11/2015	14-00146 / 19-00067
Atmos Energy	ATO	Texas (Mid-Tex)	9.80%	N/A-RRM	9.80%	09/xx/2021	Various City Ordinances
Atmos Energy	ATO	Texas (Mid-Tex)	9.80%	GRIP	9.80%	12/11/2018	Environs: GUD 10742
Atmos Energy	ATO	Texas (Mid-Tex)	9.80%	GRIP	9.80%	9/26/2019	ATM Cities SOI
Atmos Energy	ATO	Texas (Mid-Tex)	9.80%	N/A-DARR	9.80%	6/9/2021	Ord. 31885
Atmos Energy	ATO	Texas (West Texas)	9.80%	N/A-RRM	9.80%	09/xx/2021	Various City Ordinances
Atmos Energy	ATO	Texas (West Texas)	[1]	GRIP	[1]	6/1/2021	Various City Ordinances
Atmos Energy	ATO	Texas (West Texas)	9.80%	GRIP	9.80%	12/11/2018	GUD 10174
Atmos Energy	ATO	Virginia	9.20%	SAVE	9.20%	4/1/2019	PUE-2018-00014

[1] No ROE specified, however the ROR used for infrastructure is the same as base rate recovery

**Case No. 2021-00214**  
**Atmos Energy Corporation, Kentucky Division**  
**Staff DR Set No. 4**  
**Question No. 4-07**  
**Page 1 of 1**

**REQUEST:**

Explain whether Atmos offers any relief from late payment charges to residential customers that receive a pledge for or notice of low-income energy assistance from an authorized agency.

- a. If so, explain whether such a provision is included in Atmos's tariff, and indicate where it is included in the tariff.
- b. If Atmos does not offer such a provision, explain whether Atmos has considered offering relief from late payment charges to residential customers that receive a pledge for or notice of low-income energy assistance from an authorized agency.
- c. If Atmos does not offer such a provision, explain whether Atmos would have an objection to adding a provision to its tariff, waiving late payment charges for a certain number of months for those residential customers who do receive a pledge for or notice of low-income energy assistance from an authorized agency.

**RESPONSE:**

Yes, Atmos Energy does offer relief from late payment charges for up to 60 days if it is received prior to the payment becoming late.

- a. This practice is not included in our tariff. The pledge can be made either through assistance agencies via Atmos Energy's online portal for those agencies; directly through an Atmos Energy - Energy Assistance employee; or through a flat file (database) sent to us by the state or agency. When the pledge is entered onto an account a lock is automatically created that blocks any dunning activity including late fees for up to 30 days. Additionally, that account is protected for up to an additional 30 days for late fees on balances up to the amount of the pledge. If the energy assistance payment is received for the full amount, the past due amount is cleared in which case no late-fee is assessed.
- b. Please see the response to subpart (a).
- c. Please see the response to subpart (a).

Respondent: Brannon Taylor