

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

APPLICATION OF ATMOS ENERGY )  
CORPORATION TO EXTEND ITS ) CASE NO. 2021-00401  
DEMAND-SIDE MANAGEMENT )  
PROGRAM, AS AMENDED, AND )  
COST RECOVERY MECHANISM )  
AS AMENDED FOR TWO (2) YEARS )

**ATMOS ENERGY CORPORATION’S MOTION TO FILE ITS APPLICATION TO  
EXTEND ITS DEMAND -SIDE MANAGEMENT PROGRAM OR IN THE  
ALTERNATIVE AN ORDER AUTHORIZING THE UNWINDING OF ITS DEMAND  
SIDE MANAGEMENT PROGRAM**

---

Atmos Energy Corporation (“Company”), by counsel, pursuant to KRS 278.285 and the Commission’s Order of April 27, 2018 (“Order”) in Case No. 2017-00424 moves for an order from the Kentucky Public Service Commission (“Commission”) to grant it leave to file an application to extend its Demand-Side Management Program (DSM) or, in the alternative, for an order authorizing the unwinding of the Demand Side Management Program (“DSM”).

1. In the Order dated April 27, 2018 in Case 2017-00424, the Commission found that “Atmos's Low-Income Weatherization Program is approved through April 30, 2021.”<sup>1</sup>

2. The Company inadvertently failed to timely file for a renewal of its DSM and has continued to administer the program pursuant to the filed tariff, which has remained in effect since April 30, 2021.

3. Residential customers have continued to be billed and have been paying a volumetric charge of \$0.0053/ccf and Commercial customers were receiving a volumetric credit

---

<sup>1</sup> Order at 6 (Ky. PSC April 27, 2018).

of \$0.0044/ccf. Upon realizing that the DSM program had not been renewed, the Company promptly ceased assessing DSM charges and credits on October 15, 2021.

4. From the period of May 1, 2021 through September 30, 2021, the Company collected approximately \$5,900 from residential customers and credited approximately \$4,000 to commercial customers. The Company also spent approximately \$37,000 on what would have been qualifying DSM projects had the program not terminated on April 30, 2021.

5. Given the Commission's prior findings that "low-income weatherization programs provide valuable assistance to income-eligible customers by reducing their heating bills"<sup>2</sup> and the fact that gas commodity costs are significantly higher now than they were in 2018 when the current DSM was approved, the Company submits that good cause exists to allow the filing of the application to renew and extend the current DSM program, which consists solely of low-income weatherization, until April 30, 2023.

6. The Company is currently over-recovered on its DSMRC balance, and as such, would propose to continue the program at a \$0.0000/ccf rate until April 30, 2023. For an accounting of the DSM program balances as of April 30, 2021, please see Attachment 1.

7. Such an extension would create sufficient time for the Company and the Commission to determine if the current prevailing gas costs continue, and if they permit favorable Total Resource Cost scores for alternative DSM programs which would signify benefits for Kentuckians in excess of the costs of DSM.

8. In the alternative, if the Commission chooses not to allow the Company to file its application for the DSM program to continue and allows the termination of the program pursuant to the Order of April 27, 2018, the Company asks that it be allowed to take the over-recovered

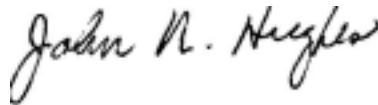
---

<sup>2</sup> Order at 5.

balances as of April 30, 2021, as well as the approximately \$5,900 collected from residential customers since May 1, 2021, and return those amounts to customers through its Gas Cost Adjustment for the period. The Company would propose to not recover its approximately \$37,000 of program expenses incurred after April 30, 2021.

For the reasons stated , Atmos Energy Corporation moves for: (1) a an order allowing the filing of its application extending its DSM until April 30, 2023 or in the alternative; (2) an order from the Commission authorizing placing both the \$5,900 collected from residential customers since May 1, 2021 and the over-recovered DSM balances as of April 30, 2021 into FERC Account No. 191 and allowing them to be returned to customers on a volumetric basis through the Gas Cost Adjustment.

Submitted this 28<sup>th</sup> day of October, 2021.

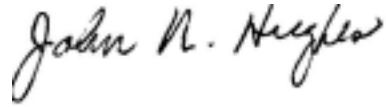


John N. Hughes  
124 W. Todd St.  
Frankfort, KY 40601  
(502) 227-7270 Ph  
([jnhughes@johnnhughespsc.com](mailto:jnhughes@johnnhughespsc.com))

WILSON, HUTCHINSON & LITTLEPAGE  
Mark R. Hutchinson  
611 Frederica Street  
Owensboro, Kentucky 42301  
([randy@whplawfirm.com](mailto:randy@whplawfirm.com))

**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 original documents the electronic filing has been transmitted to the Commission on October 28, 2021 and that no party has been excused from participation by electronic means.

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