

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF ATMOS)	CASE NO.
ENERGY CORPORATION FOR AN)	2021-00214
ADJUSTMENT OF RATES)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO ATMOS ENERGY CORPORATION

Atmos Energy Corporation (Atmos), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on November 4, 2021. The Commission directs Atmos to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

Atmos shall make timely amendment to any prior response if Atmos obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Atmos fails or refuses to furnish all or part of the requested information, Atmos shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Atmos shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. 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.

2. 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.

3. 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.

4. 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.

5. 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.

6. 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.

7. 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.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 19 2021

cc: Parties of Record

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Randy Hutchinson
Wilson, Hutchinson & Littlepage
611 Frederica Street
Owensboro, KENTUCKY 42301

*Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, KY 42303

*Eric Wilen
Project Manager-Rates & Regulatory Affairs
Atmos Energy Corporation
5420 LBJ Freeway, Suite 1629
Dallas, TEXAS 75420

*Brannon Taylor
Atmos Energy Corporation
810 Crescent Centre Drive, Suite 600
Franklin, TN 37067

*Honorable John N Hughes
Attorney at Law
124 West Todd Street
Frankfort, KENTUCKY 40601

*John G Horne, II
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*J. Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204