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April 6, 2020

David Foster
Utilities Division Director
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

Re: *Emergency Petition to Suspend Service Disconnections Filed by the Consumer Advocate Unit of the Financial Division of the Office of the Tennessee Attorney General, Docket No. 20-00047*

Dear Mr. Foster

As part of its efforts to protect its customers and employees for the duration of the current COVID-19 public health emergency, Atmos Energy Corporation (“Atmos Energy” or “Company”) plans to immediately implement an option that will allow active gas service to be transferred from one customer to another at the same location for a period of time with no actual disconnection or interruption of service. This option, known as a “soft close”, is an industry accepted practice the Company already uses in Colorado, Kansas, Louisiana, and Texas, and for which Atmos Energy already has a service procedure manual. A copy of that manual, which Atmos Energy would follow in Tennessee, is attached as **Exhibit 1**. Implementing this option in Tennessee will help Atmos Energy further limit the interactions between its customers and employees, thereby helping to minimize the spread of novel coronavirus COVID-19.

Atmos Energy is implementing this soft close option effective immediately through the duration of this public health emergency.

Please contact me or my associate, Erik Lybeck, if you need additional information or clarification. We are both working from home pursuant to Mayor Cooper’s and Governor Lee’s Orders, but we can be reached on our cell phones: (615) 476-1641 for me, and (615) 927-2337 for Erik.

Sincerely,

A handwritten signature in black ink, appearing to be 'A. Scott Ross', written on a light gray rectangular background.

A. Scott Ross

ASR:prd

cc: Erik Lybeck
Mark Martin
Kevin Frank

SERVICE PROCEDURE MANUAL

Reference: National Fuel Gas Code, [192.727](#)

Chapter 4: Customer Caution Notice Procedure

Soft Close Procedure

The Soft Close Procedure describes a method which allows the transfer of active gas service from one party to another at the same location over a period of time with no actual disconnection or interruption of service.

This standard is written to apply to residential accounts but may be used in other circumstances approved by state specific regulations.

Once a technician receives a MVTMORD order, the technician will:

Verify the address and meter number from the service order.

1. Verify if the inlet meter valve is positioned off or on
2. Observe meter for abnormal consumption on the meter which could indicate a problem. Hard close the meter set if necessary.
3. Complete the field service order appropriately

If the technician verifies gas service to be ON, then:

- a. Leave the gas meter on
- b. Record meter reading on the field service order
- c. The technician will leave the appropriate door tag to notify the new customer that the gas is currently on.

If the technician verifies gas service to be OFF, then:

- a. Secure the Meter (see the Turn Off Procedure)
 - b. Complete service order and (if applicable) include meter reading in service order notes.
4. Paint for protection from atmospheric corrosion and appearance as necessary.