

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:

PETITION OF ATMOS ENERGY)	
CORPORATION FOR WAIVER)	
OF METER TESTING UNDER)	Docket No. 20- <u>00079</u>
TPUC RULE 1220-04-05-.26(e))	

**PRE-FILED TESTIMONY OF MARK A. MARTIN
ON BEHALF OF ATMOS ENERGY CORPORATION**

I. INTRODUCTION OF WITNESS

Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

A. My name is Mark A. Martin. I am Vice President - Rates and Regulatory Affairs for the Kentucky/Mid-States Division of Atmos Energy Corporation (“Atmos Energy” or the “Company”). My business address is 3275 Highland Pointe Drive, Owensboro, Kentucky, 42303.

Q. PLEASE BRIEFLY DESCRIBE YOUR CURRENT RESPONSIBILITIES, AND PROFESSIONAL AND EDUCATIONAL BACKGROUND.

A. I am responsible for all rate and regulatory matters in Kentucky, Tennessee and Virginia. I graduated from Eastern Illinois University in 1995 with a degree in Accounting. I have been with United Cities Gas Company and subsequently its successor, Atmos Energy Corporation, since September 1995. I have served in a variety of positions of increasing responsibility in both Gas Supply and Rates prior to assuming my current responsibilities in 2007.

Q. HAVE YOU SUBMITTED TESTIMONY BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION (“COMMISSION”)?

A. Yes. I filed Rebuttal Testimony in Docket No. 19-00018.

Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY ON MATTERS BEFORE OTHER STATE REGULATORY COMMISSIONS?

A. Yes, I have filed testimony before the Georgia Public Service Commission, the Kentucky Public Service Commission, the Illinois Commerce Commission, the Missouri Public Service Commission, the South Carolina Public Service Commission, and the Virginia State Corporation Commission.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. My testimony's purpose is to explain why the Company is seeking a waiver of TPUC rule 1220-04-05-.26(e).

Q. WHAT IS THE COMPANY'S NORMAL METER SAMPLING PROGRAM?

A. For residential and small commercial meters, the Company follows the following basic process cycle: (1) Run a report of total meters (not including large volume meters that are already tested under other programs); (2) Sort the meters by make; (3) Randomly select the meters to be tested; (4) Pull the identified meters and send to a third-party testing facility; and (5) Review the results and take necessary corrective actions.

Q. HOW DOES THE COMPANY DETERMINE HOW MANY METERS TO TEST?

A. The Company does so in accordance with ANSI Standard Z1.4, which ensures minimum sampling sizes for each make of meter to mitigate the three categories of sampling error: (1) Testing bias (lack of accuracy); (2) Dispersion (lack of precision); and (3) Non-reproducibility (lack of consistency).

Q. IS THE METER SAMPLING PROGRAM SAFETY-RELATED?

A. No, the meter sampling program is related to accuracy of measurement, and not customer or public safety.

Q. WHY IS THE COMPANY SEEKING A WAIVER OF TPUC RULE 1220-04-05-.26(e)?

A. The Company's normal meter sampling and testing schedule was impacted by the outbreak of the Coronavirus. In response to calls to limit the spread of the Coronavirus, the Company suspended certain types of non-safety related field work in March. One of the suspended activities was pulling meters for the meter sampling program. The company intends to wait until at least sixty days after the end of the currently declared public health emergency to resume this type of work. That would effectively prevent resumption of meter testing until late August at the earliest. This means that the Company, at a minimum, has essentially lost half of calendar year 2020 in which to perform its meter sampling.

Q. WHEN DOES THE COMPANY ANTICIPATE IT WILL BE ABLE TO COMPLETE THE 2020 METER SAMPLING CYCLE?

A. It is the Company's hope that it will be able to "catch-up" and test enough meters in the remaining months of 2020 and all of calendar year 2021 to satisfy the sampling requirements of both years. However, if it is unable to do so, it will file an additional waiver request in calendar year 2021.

Q. DOES THIS COMPLETE YOUR TESTIMONY?

A. Yes.