

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

**IN RE:** )  
 )  
**PETITION OF ATMOS ENERGY** )  
**CORPORATION FOR WAIVER** )  
**OF METER TESTING UNDER** ) **Docket No. 21- 00017**  
**TPUC RULE 1220-04-05-.26(e)** )

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**PETITION FOR WAIVER OF REQUIREMENT THAT METER TESTING UNDER  
TPUC RULE 1220-04-05-.26(1)(e) FOR CALENDAR YEAR 2020 BE COMPLETED AND  
OF REQUIREMENT THAT 2021 METER TESTING BE COMPLETED IN CALENDAR  
YEAR 2021**

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Atmos Energy Corporation (“Atmos Energy” or “Company”) respectfully requests that the Tennessee Public Utility Commission (“Commission”) approve (i) a waiver of the requirement that Atmos Energy complete its periodic meter testing obligations under TPUC Rule 1220-04-05-.26(1)(e) for the calendar year 2020 (which the Commission previously allowed to be completed in calendar year 2021 if possible) and (ii) a waiver of the requirement that its 2021 periodic meter testing obligations be completed in calendar year 2021.

In support of this Petition, Atmos Energy respectfully submits the following:

1. Full name and address of the principal place of business of the company are:

Atmos Energy Corporation  
5430 LBJ Freeway S 1800  
Dallas, TX 75240

2. All correspondence and communications with respect to this Petition should be sent to the following:

Brannon C. Taylor  
Vice President, Rates & Regulatory Affairs  
KY/Mid-States Division

Atmos Energy Corporation  
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3. Atmos Energy is a corporation organized and existing under the laws of the state of Texas and Virginia and is engaged in the business of transporting, distributing and selling natural gas, including in areas of Tennessee.

4. Under TPUC Rule 1220-04-05-.26(1)(e), gas utilities (including Atmos Energy) are required to “make periodic tests of meters, associated devices and instruments, to assure their accuracy.” These tests are to be completed “within the calendar year” “[u]nless otherwise authorized by the Commission.” Tenn. Comp. R. & Regs. 1220-04-05-.26(1)(e).

5. As has been set forth in its reports to the Commission filed in Docket No. 20-00047, Atmos Energy has implemented a wide-ranging set of procedures to ensure the safety of the Company’s customers and employees, and of the communities served by the Company, in response to the COVID-19 public health emergency.

6. Among these safety procedures was the suspension of periodic meter testing, in March of last year to help limit the spread of the coronavirus.

7. Atmos Energy remains committed to taking a slow and deliberate return to normal operations after the conclusion of the formally declared public health emergency.

8. Because a public health emergency remains declared in Tennessee and Atmos Energy intends to wait at least sixty days after the end of that emergency (which may be extended again) to begin its return to normal operations, Atmos Energy will, at a minimum, have suspended meter testing for a substantial portion of 2021. Completing the 2021 periodic meter testing obligations over may not be feasible.

9. The Company had previously received a waiver of its 2020 meter testing requirements in Docket No. 20-00079. In that proceeding, the Company stated that if it was not able to “catch-up” and test enough meters in 2020 and calendar year 2021 to satisfy the requirements for both years, it would file an additional waiver request. At the present time, it has become apparent that the Company will not be able to “catch-up” and complete the 2020 meter testing. Atmos Energy asks that the Commission relieve it of its obligation to perform meter testing associated with calendar year 2020.

10. In further support of this Petition, Atmos Energy relies upon the Pre-Filed Testimony of Brannon C. Taylor.

**WHEREFORE**, Atmos Energy respectfully requests that the Commission waive the Company’s obligation to complete meter testing within this calendar year and waive the Company of the obligation to perform meter testing associated with calendar year 2020.

Respectfully submitted,

**NEAL & HARWELL, PLC**

By: 

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