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 1220-04-0526(e))	

PRE-FILED TESTIMONY OF BRANNON C. TAYLOR ON BEHALF OF ATMOS ENERGY CORPORATION

I. INTRODUCTION OF WITNESS

- Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.
- A. My name is Brannon C. Taylor. 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 810 Crescent Centre Dr #600, Franklin, TN 37067.
- 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 Vanderbilt University in 2009 with a degree in Political Science. I also graduated with a law degree from Emory University in 2012 and am a licensed attorney. I have been with Atmos Energy Corporation since September 2012. I have served in a variety of positions of increasing responsibility in both Rates and the Kentucky/Mid-States Division prior to assuming my current responsibilities in 2020.
- Q. HAVE YOU SUBMITTED TESTIMONY BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION ("COMMISSION")?
- A. No.
- 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(1)(e).
- O. 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(1)(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, 2020. 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. Given that the state of emergency remains in effect for Tennessee, this would effectively preclude any meter testing until well into calendar year 2021.

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

A. No. While it had been the Company's hope that it would be able to "catch-up" and test enough meters in the in calendar year 2021 to satisfy the sampling requirements of 2020, it is now clear that is not possible.

Q. DOES THE COMPANY ANTICIPATE IT WILL BE ABLE TO COMPLETE ITS 2021 METER SAMPLING CYCLE?

A. At this point, it is too early to say, as it is not yet known how long the meter sampling activities of calendar year 2021 will be delayed. As it did in last year's waiver request in Docket No. 20-00079, the Company will file an additional request for waivers or modifications to the 2021 meter sampling plan when more certainty is available.

Q. DOES THIS COMPLETE YOUR TESTIMONY?

A. Yes.

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

IN RE:		
PETITION OFATMOS ENERGY CORPORATION FOR WAIVER OF METER TESTING UNDER TPUC RULE 1220-04-0526(e))	Docket No. 21
V	ERIFICATIO	N
STATE OF TENNESSEE)	
COUNTY OF WILLIAMSON)	
I, Brannon C. Taylor, being first	duly sworn, s	tate that I am Vice President Rates and
Regulatory Affairs for the Kentucky/Mic	l-States Divisio	on of Atmos Energy Corporation, that I am
authorized to testify on behalf of Atmos	Energy Corpor	ration in the above-referenced docket, that
the foregoing testimony in support of At	mos Energy Co	orporation's filing is true and correct to the
best of my knowledge, information and	belief.	
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		Brannon C. Taylor
Sworn and subscribed before me this 2	🛂 day of Jam	uary, 2021.
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