

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

IN RE:

PETITION OF ATMOS ENERGY)	
CORPORATION TO AMEND)	
TARIFF FOR ALLOWANCE)	Docket No. 21- <u>00068</u>
OF PERMANENT "SOFT CLOSE")	

**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 from Emory University in 2012 with a law degree 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. Yes. I filed testimony before the Commission in Docket Nos. 21-00017 and 21-00019.

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

A. My testimony’s purpose is to explain why the Company is seeking to amend its tariff for the option to 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 (“Soft Close”)

Q. WHAT IS THE COMPANY’S NORMAL CLOSE PROCESS?

A. Prior to implementing the Soft Close process, the Company would need to physically turn off the meter at an address to transfer service from one customer to another. This would involve sending a service truck and technician or qualified contractor to turn off the meter, and to also repeat the process to turn on the meter again once the new customer had been established at the address.

Q. WHEN DID THE COMPANY IMPLEMENT THE SOFT CLOSE PROCESS?

A. The Company implemented the Soft Close process in Tennessee shortly after the beginning of the COVID-19 pandemic. The Company notified the Commission of the Soft Close process in its April 6, 2020 letter to the Commission in Docket No. 20-00047.

Q. PLEASE BRIEFLY DESCRIBE THE SOFT CLOSE PROCESS?

A. I have attached as Exhibit 1 to my testimony the Soft Close Procedure from the Atmos Energy Service Procedure Manual. In addition to having successfully implemented Soft Close in Tennessee for the duration of the COVID-19 pandemic, this was a practice that the Company had already utilized and successfully employed in Colorado, Kansas, Louisiana and Texas.

Q. WHY IS THE COMPANY SEEKING A PETITION TO MAKE THE SOFT CLOSE PROCESS PERMANENT IN TENNESSEE?

A. As mentioned above, the Company believes the Soft Close process has been very successful during this past year. In addition to successfully limiting interactions between customers and employees, this procedure reduces the potential for customer confusion regarding the turn-on process, and the process can be handled and transitioned safely and reliably through the Company's information technology processes. With the expiration of the Governor's State of Emergency Order in Tennessee, the Company is seeking to make the Soft Close process permanent.

Q. WHAT WOULD ALLOWING SOFT CLOSE CHANGE FROM A PRACTICAL STANDPOINT?

A. When a customer terminates service and leaves a residential or commercial premise, natural gas service would not be shut off to that structure and customers would be instructed to set thermostats and water heaters at a low usage level. A final meter reading would be taken for that customer. When a different customer initiates service at that premise, a new meter reading would be taken. The new customer would already have an established premise in the Company's billing system and the new meter reading would be taken automatically, thus facilitating a more efficient transition. The cost of any minor amounts of natural gas consumed between customers would be factored into the Company's Lost and Unaccounted for Gas calculation as part of the Company's Purchased Gas Adjustment.

The avoided costs of dispatching service technicians to physically disconnect and reconnect gas service are reflected in lower O&M expenses in the Company's annual ratemaking mechanism filings.

Q. HAS THE COMPANY BEEN ABLE TO SAFELY AND RELIABLY OPERATE IN TENNESSEE WITH THE SOFT CLOSE PROCESS?

A. Yes. The Company has been able to operate safely and reliably in Tennessee using Soft Close, and to do so without diminishing its high standard of customer service.

Q. HAS THE COMPANY SUBMITTED ITS PROPOSED TARIFF UPDATE TO INCORPORATE THE SOFT CLOSE PROCESS?

A. Yes. The proposed update to the Company's tariff to allow for Soft Close in Tennessee was submitted by the Company as Exhibit 1 to its Petition.

Q. DOES THIS COMPLETE YOUR TESTIMONY?

A. Yes.

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VERIFICATION

STATE OF TENNESSEE)

COUNTY OF WILLIAMSON)

I, Brannon C. Taylor, being first duly sworn, state that I am Vice President -- Rates and Regulatory Affairs for the Kentucky/Mid-States Division of Atmos Energy Corporation, that I am authorized to testify on behalf of Atmos Energy Corporation in the above-referenced docket, that the foregoing testimony in support of Atmos Energy Corporation's filing is true and correct to the best of my knowledge, information and belief.


Brannon C. Taylor

Sworn and subscribed before me this 9th day of June, 2021.


Notary Public

My Commission Expires: 9-18-2022



EXHIBIT

1

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.