

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

**IN RE:**

<b>PETITION OF ATMOS ENERGY</b>	<b>)</b>	
<b>CORPORATION FOR WAIVER</b>	<b>)</b>	
<b>OF 2021 METER TESTING UNDER</b>	<b>)</b>	<b>Docket No. 21- <u>00109</u></b>
<b>TPUC RULE 1220-04-05-.26(e)</b>	<b>)</b>	

**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. Yes, in various proceedings.

**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, 2020. One of the suspended activities was pulling meters for the meter sampling program. In Docket No. 21-00017 the Commission found that Atmos should be relieved of its obligation to

complete meter testing associated with calendar year 2020 and that Atmos Energy's requirement to complete meter testing for calendar year 2021 within this calendar year should be waived.

**Q. DOES THE COMPANY ANTICIPATE IT WILL BE ABLE TO COMPLETE ITS 2021 METER SAMPLING CYCLE IN A TIMELY MANNER?**

A. As mentioned in my testimony in Docket No. 21-00017, the Company did not know how long the meter sampling activities of calendar year 2021 would be delayed. With the ongoing nature of the coronavirus and the Company seeking to limit interaction, the Company now believes requiring the resumption of the meter testing program at this time would unnecessarily increase human interaction and could result in additional spread of the coronavirus and is therefore seeking a full waiver for 2021 meter testing.

**Q. DOES THIS COMPLETE YOUR TESTIMONY?**

A. Yes.

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CORPORATION FOR WAIVER  
OF 2021 METER TESTING UNDER  
TPUC RULE 1220-04-05-.26(e)**

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**Docket No. 21-\_\_\_\_\_**

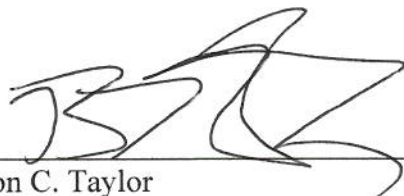
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**VERIFICATION**

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STATE OF TENNESSEE       )  
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COUNTY OF DAVIDSON     )

I, Brannon C. Taylor, being first duly sworn, state that I am the Vice President – Rates and Regulatory Affairs for the Kentucky/Mid-States Division for 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 Petition and the Exhibits thereto pre-filed in this docket on the date of filing of this Petition are 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 14<sup>th</sup> day of September, 2021.

  
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Notary Public

My Commission Expires: 11/17/24



My Commission Expires  
November 17, 2024