

1 **Q. Please state your name and business address.**

2 A. My name is Daniel P. Bertotti. I am Vice President of Business Development for the
3 Kentucky/Mid-States Division of Atmos Energy Corporation. My business address is 810 Crescent
4 Centre Drive, Suite 600, Franklin, TN 37067.

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6 **Q. Have you ever testified before the Tennessee Public Utilities Commission?**

7 A. Yes, I have previously testified before the Tennessee Public Utilities Commission in
8 Docket Nos. 05-00258, 07-00020, and 19-00072.

9

10 **Q. Please provide a brief summary of your education qualifications and experience.**

11 A. I graduated in 1994 from the University of Tennessee with a bachelor's degree in
12 mechanical engineering. That same year, I began working with United Cities Gas Company as an
13 industrial sales representative. Since that time, I have been promoted through positions of
14 increasing responsibility. From 2018 through 2025, I served as Vice President of Marketing. In
15 January 2026, I assumed my current role as Vice President of Business Development.

16

17 **Q. What is the purpose of your testimony in this proceeding?**

18 A. The purpose of my testimony is to support the Company's request for approval of tariff
19 modifications under which Atmos Energy would begin offering certain classes of customers the
20 ability to opt into a monthly facilities charge for electronic flow measurement ("EFM") equipment.

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1 **Q. Can you briefly describe what EFM equipment is?**

2 A. EFM equipment uses sophisticated technologies to accurately measure gas volume and
3 flow rate, which is then used to establish the amount of gas consumed by a particular customer for
4 purposes of charging them pursuant to the applicable volumetric rate. Data generated by EFM
5 equipment can be transmitted using either (i) cellular equipment which uses wireless networks
6 (like a smart phone) or (ii) "Plain Old Telephone Service," otherwise known as "POTS," which
7 uses analog copper phone lines (like a traditional land-line).

8
9 **Q. Do all of Atmos Energy's customers use EFM equipment?**

10 A. No. EFM equipment is only required for customers whose annual usage exceeds 10,000
11 mcf yearly, meaning it is only needed for larger customers with significant demand. The only
12 customers required to use EFM equipment in Tennessee receive service under Schedule 240
13 (Demand/Commodity Gas Service), Schedule 250 (Interruptible Gas Service), and Schedule 260
14 (Transportation Gas Service).

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16 **Q. Will customers using EFM equipment face any changes this year?**

17 A. Yes. Federal regulations are resulting in a forced migration away from POTS. Because of
18 the wide-spread adoption of voice-over-internet-protocol ("VOIP") and other modern technology
19 allowing for telephone communication through alternative means, the analog copper phone lines
20 used in POTS are falling out of use. In response to these developments, the FCC has issued a series
21 of Orders reducing regulatory barriers to retirement of existing lines and facilitating the transition
22 away from POTS, which has resulted in telecommunications companies retiring their POTS

1 services. Atmos Energy was recently informed that the POTS service provider in its service
2 territory will no longer offer POTS service effective September 1, 2026.

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4 Approximately 25 of Atmos Energy's demand/commodity, interruptible service, and
5 transportation gas service customers have older EFM equipment that transmit data using POTS,
6 which will become inoperable later this year. To avoid loss of access to these meters (without
7 which Atmos Energy cannot provide service), any customer with POTS equipment will need to
8 replace their existing equipment with equipment capable of transmitting EFM data using cellular
9 networks at some point in the coming months.

10
11 **Q. Under the Company's tariff, who will be responsible for the costs of transitioning**
12 **from POTS to cellular equipment later this year?**

13 A. The customers are responsible for any costs associated with the transition from POTS to
14 cellular data transmission. The relevant tariff sheets for each of the Schedules 240, 250, and 260
15 state, in identical language, that customers "shall be required to pay for the cost and installation of
16 measurement data collection and verification equipment" and "shall also be required to pay the
17 cost of installation, maintenance, and any monthly usage charges associated with telephone,
18 power, or other utilities or energy sources required for the operation of the data collection and
19 verification equipment."¹

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21 **Q. What is the cost of transitioning from POTS lines to Cellular EFM?**

22 A. The cost of transitioning from POTS lines to Cellular EFM is \$6,330.

¹ 3rd Revised Sheet No. 17; 3rd Revised Sheet No. 20; 15th Revised Sheet No. 24.

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Q. How would Atmos Energy's proposed monthly EFM facilities charge work?

A. Under the Company's proposed tariff changes, customers would be given the ability to pay Atmos Energy a monthly charge of \$75.00 instead of paying Atmos Energy a lump sum charge of \$6,330. In exchange for this monthly charge, the Company would incur all costs associated with installing and maintaining the new equipment.

Q. Why does Atmos Energy want to offer a monthly EFM facilities charge?

A. Atmos Energy wants to offer this charge as a service to its customers. Through the monthly charge, customers would gain the ability to defray the costs of the move from POTS to cellular equipment. The costs associated with transitioning EFM equipment from POTS to cellular transmission may impose hardships on some customers. Under the Company's proposed tariff amendments, customers will be able to obtain the same result (namely, maintaining functioning EFM equipment that transmits on cellular systems) by paying Atmos Energy a set monthly amount rather than bearing all costs associated with this transition immediately and on their own.

Q. Is the Company asking for permission to impose this monthly charge on all customers with EFM facilities?

A. No. Customers will remain free to pay for the cost of installation and maintenance of EFM equipment out-of-pocket. The proposed tariff amendment would merely give customers the ability to opt into the monthly charge if they wish to do so, rather than bear the financial burden upfront.

1 **Q. Would the implementation of this monthly charge affect any of the Company's other**
2 **existing or future Tennessee rate payers of Atmos Energy?**

3 A. No. The proposed tariff amendments are limited to the large customers who have EFM
4 equipment, and neither the monthly charge nor costs incurred in providing this service will be
5 included in the Company's volumetric rates for any customer class.

6

7 **Q. Has the monthly charge been calculated in a way that is designed to be rate neutral**
8 **to other customers?**

9 A. Yes. As discussed in my answer to the last question, neither this monthly charge nor any
10 associated costs will be recovered through the Company's volumetric rates. In addition, the amount
11 of the monthly rate has been determined using the following EFM Cellular Conversion
12 calculations, which have been designed to recover the cost of the equipment over its expected life:

- 13 • Total Costs: \$6,330
 - 14 ○ EFM (MIWI350, Solar Panel, Modem) - \$4,750
 - 15 ○ Pulsar (206 Pulse Transmitter) - \$525
 - 16 ○ Shipping - \$60
 - 17 ○ Installation Charge - \$995
- 18 • Average expected life of equipment: 84 months
- 19 • Total Costs (\$6,330) / Expected life (84 months): \$75.36/month

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21 **Q. Has Atmos Energy implemented a similar monthly charge in any other jurisdiction?**

22 A. Yes. Atmos Energy collects a monthly EFM facilities charge under the terms of its tariff
23 in Kentucky, where it has been successful. For example, in Kentucky, roughly 164 out of a

1 potential 205 customers opted for the monthly EFM charge rather than paying the initial cost
2 upfront.

3

4 **Q. Should the Tennessee Public Utilities Commission approve the proposed tariff**
5 **amendments giving customers the ability to opt into a monthly EFM facilities charge?**

6 A. Yes. These proposed amendments are both just and reasonable. They will have no material
7 impact on any customers besides those who voluntarily choose to opt into the monthly EFM
8 facilities charge, and those customers will be able to benefit from having additional options for
9 dealing with the costs caused by the forced migration away from POTS technology.

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11 **Q. Does this conclude your testimony?**

12 A. Yes.

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

IN RE:)
)
PETITION OF ATMOS ENERGY) Docket No. 26- _____
CORPORATION FOR APPROVAL OF)
OPTIONAL MONTHLY FACILITIES)
CHARGE FOR ELECTRONIC FLOW)
MEASUREMENT EQUIPMENT FOR)
DEMAND/COMMODITY,)
INTERRUPTIBLE, AND)
TRANSPORTATION GAS SERVICE)
CUSTOMERS)

VERIFICATION

STATE OF TENNESSEE)
COUNTY OF WILLIAMSON)

I, Daniel P. Bertotti, being first duly sworn, state that I am the Vice President of Business Development for Atmos Energy Corporation, that I am authorized to testify on behalf of Atmos Energy Corporation in the above referenced docket, that the Direct Testimony of Daniel P. Bertotti in support of Atmos Energy Corporation's filing is true and correct to the best of my knowledge, information, and belief.

Daniel P Bertotti
Daniel P. Bertotti

Sworn and subscribed before me this 27th day of February, 2026.

Pamela Pleasant
Notary Public

My Commission Expires: 01-24-2028

