

TENNESSEE PUBLIC UTILITY COMMISSION



Andrew Jackson State Office Bldg.
502 Deaderick Street, 4th Floor
Nashville, TN 37243-0001

June 5, 2026

Docket 26-00014

Mr. Erik Lybeck
Sims | Funk, PLC
3102 West End Avenue
Suite 1100
Nashville TN 37203
elybeck@simsfunk.com

Electronically Filed in TPUC Docket
Room on June 5, 2026 at 2:50 p.m.

sent via email

Re: *Petition of Atmos Energy Corporation for Approval of Optional Monthly Facilities Charge for Electronic Flow Measurement Equipment for Demand/Commodity, Interruptible, and Transportation Gas Service Customers*

Dear Mr. Lybeck:

To assist the Commission in its understanding of and continuing evaluation regarding this matter, please respond to the following requests for information:

1. Please clarify the Company's treatment of the proposed \$75 monthly EFM facilities charge once the equipment reaches the end of its estimated 84-month economic life. Specifically:
 - Does the \$75 monthly charge continue unchanged beginning in Month 85, terminate, or reset in any manner?
 - Please describe the anticipated disposition of the EFM equipment at the end of the 84-month period (e.g., continued use if still functional or removal/disposal with corresponding replacement with new equipment).
2. Beginning September 1, 2026, please explain what the Company intends to record for depreciation for each EFM-related customer's equipment. In your response, identify the depreciation rate used for EFM assets and describe how this depreciation rate aligns with or differs from the calculation underlying the proposed \$75 monthly charge. In your

response, discuss the intended methodologies under (a) the optional \$75 charge scenario and (b) the upfront purchase scenario.

3. As of September 1, 2026, confirm whether it is the Company's intent to fully maintain EFM equipment for all affected customers, regardless of whether those customers purchase the equipment upfront or elect the optional \$75 monthly charge. Additionally, discuss how this treatment compares to current tariff provisions, which require customers who own their flow measurement equipment to pay for maintenance. In particular, clarify whether customers who choose the upfront purchase option after September 1, 2026, will be responsible for separate maintenance charge and how this differs from current practice.
4. Refer to the revised Schedule 240 - Measurement Data Collection Equipment Section. Please clarify responsibilities under the two payment options for EFM equipment:
 - a. Under the upfront (one-time) purchase option, identify any EFM-related costs not included in the upfront payment. Be sure to address costs such as installation, data transmission, maintenance, electrical power, operational, etc. For each excluded cost, explain who is responsible for such cost and, if it be the customer, when/how the customer will be billed.
 - b. Under the optional \$75 monthly facilities charge, the Company stated that the charge includes all EFM-related costs. Please address whether "all costs" include equipment, installation, maintenance, operations, data transmission, electrical power, etc. If any costs are excluded from the \$75 monthly charge, please identify them, the responsible party, and – if customers are responsible – describe how they will be billed.

A response is requested no later than Friday, June 12. In accordance with the Commission's rules, please submit your response electronically to the Docket Manager at tpuc.docketroom@tn.gov with the original and four copies also mailed to the Docket Manager. Should you have questions or need clarification of this request, please contact Craig Cox at craig.cox@tn.gov.

Sincerely,



Michelle Mairs,
Director of the Audit and Compliance
Utilities Division

cc: Docket File
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