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DEC 20 2006  
Missouri Public  
Service Commission

Exhibit No.:  
Issues: Rate Design

Witness: Anne Ross  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Surrebuttal Testimony  
Case No.: GR-2006-0387  
Date Testimony Prepared: November 13, 2006

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**ANNE ROSS**

**ATMOS ENERGY CORPORATION**

**CASE NO. GR-2006-0387**

**Jefferson City, Missouri  
November 2006**

STAFF Exhibit No. 113  
Case No(s). GR-2006-0387  
Date 11-30-06 Rptr PF

**BEFORE THE PUBLIC SERVICE COMMISSION**  
**OF THE STATE OF MISSOURI**

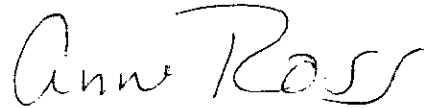
In the Matter of Atmos Energy )  
Corporation's Tariff Revision Designed to )  
Consolidate Rates and Implement a )  
General Rate Increase for Natural Gas )  
Service in the Missouri Service Area of )  
the Company. )

Case No. GR-2006-0387

**AFFIDAVIT OF ANNE ROSS**

STATE OF MISSOURI     )  
                                      ) ss  
COUNTY OF COLE     )

Anne Ross, of lawful age, on her oath states: that she has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 14 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.



Anne Ross

Subscribed and sworn to before me this 9<sup>th</sup> day of November, 2006.



SUSAN L. SUNDERMEYER  
My Commission Expires  
September 21, 2010  
Callaway County  
Commission #06942066

  
Notary Public

My commission expires 9-21-10

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**CASE NO. GR-2006-0387**

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1           3. provides little incentive for company to encourage conservation (p. 19, line 6  
2           – p. 20, line 7)

3           4. guarantees that Atmos will earn its Commission-ordered revenue requirement  
4           (Meisenheimer Rebuttal, p. 20, line 8 – p. 23, line 12)

5           5. is different from any weather or conservation mitigation adjustment used in  
6           other states (Meisenheimer Rebuttal, p. 26, line 18 – p. 27, line 13)

7           Ms. Meisenheimer also expresses concern about the Staff's proposal to divide the  
8           current Small General Service (SGS) class into two groups based on annual  
9           usage.

10                           **IMPACT ON LOW-USE CUSTOMERS**

11           Q.     What is Ms. Meisenheimer's concern regarding the delivery charge  
12           mechanism and low-use customers?

13           A.     Ms. Meisenheimer is concerned that the change to a fixed delivery charge rate  
14           design will substantially increase the non-gas rates for the small users in the Residential class.

15           Q.     Does OPC perform any analysis to substantiate this charge?

16           A.     Yes. To support her position that this change will be detrimental to low-use  
17           customers, Ms. Meisenheimer presents an analysis in which she determines, by Atmos'  
18           current districts, what selected customers' non-gas bill would be under the current rate  
19           structure. She then compares that to the delivery charge calculated by Staff. Finally, she  
20           computes the difference between the two rate structures, and the resulting percentage change  
21           from current non-gas revenues. (Rebuttal, BAM Schedule BAM REB 8.) Using the results  
22           from this analysis, she claims that the lowest use customers would "pay between 52% and

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1 173% more under the Staff's proposed delivery charge mechanism..." (Meisenheimer, p. 11,  
2 lines 15-17.)

3 Q. Do you have any comments about Ms. Meisenheimer's analysis?

4 A. Yes. When evaluating Ms. Meisenheimer's assertions, there are several things  
5 that the Commission should keep in mind. These are:

- 6 1. The dollar amounts shown on Ms. Meisenheimer's schedule represent a  
7 customer's bill over *two* years, not one year.
- 8 2. Ms. Meisenheimer used only the non-gas portion of a customer's bill when  
9 calculating and presenting the percentage difference between the current rate  
10 structure and the Staff's proposed rate structure, rather than using the bill the  
11 customers actually pay, which includes gas costs.
- 12 3. Ms. Meisenheimer presented her assertions using percentages, rather than  
13 actual dollars. The effect of that, for a given dollar amount, is that the  
14 percentage increase to lower-use customers appears to be larger, and the  
15 percentage decrease to the higher-use customers looks smaller.

16 Q. What is the time period used in Ms. Meisenheimer's analysis?

17 A. The dollar amounts shown for each subset of the Residential class are based  
18 on 24 months of usage; therefore, they represent what a customer would pay for two years of  
19 service. In reality, the actual *annual* dollar difference in a customer's annual bill from the  
20 two rate structures is not as dramatic or as high as it appears to be on Ms. Meisenheimer's  
21 BAM REB 8 schedule.

22 Q. What is your second comment on Ms. Meisenheimer's analysis?

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1           A.     Ms. Meisenheimer based her rate structure comparison on the non-gas portion  
2 of a customer's bill. While the non-gas portion of the bill may be calculated, I believe that  
3 when customers are looking at changes in their bills, they look at their *total* bill amount.  
4 Non-gas costs are now only about 20-30% of each customer's bill. Therefore, the actual  
5 impact of the non-gas cost portion of the rate structure difference in a customer's bill is  
6 significantly lower than Ms. Meisenheimer's analysis appears to show.

7           Q.     Do you have any final comments on the way in which Ms. Meisenheimer  
8 performed and presented her analysis?

9           A.     Yes. All of the customer impact information used to bolster Ms.  
10 Meisenheimer's assertions are presented in terms of percentages, rather than in terms of  
11 dollars. The current customer charge, which will be a significant portion of a low-use  
12 customer's bill, ranges from \$5 (Greeley) to \$9.05 (Palmyra.) To illustrate the effect of  
13 presenting a relatively small dollar change as a percentage, let's assume that each district's  
14 Residential customer charge increases by \$3, and look at the resulting percentage increase:

District	SEMO	Butler	Greeley	Kirksville	Palmyra	Other UCG
Current Customer Charge	\$7.00	\$7.00	\$5.00	\$7.00	\$9.05	\$7.25
Percentage change w/ \$3.00 increase	43%	43%	60%	43%	33%	41%

1 As you see, looking at this change in terms of percentages gives an entirely different  
2 impression than looking at it in absolute dollar terms. Depending on the base customer  
3 charge, a \$3.00 increase produces percentage increases ranging from 33% to 60%. The  
4 current volumetric rate is not included in this comparison which would lower the percentages  
5 even more.

6 Q. What are the effects, in dollars, on customers at various annual usage levels?

7 A. The effect on customers at various annual usage levels is presented in dollars  
8 on Schedule 1.

9 Q. If a customer uses less than the Residential normalized average usage upon  
10 which rates were set in this rate case, what effect will adopting the Staff's proposed rate  
11 structure have on the customer's annual bill?

12 A. It will increase the customer's bill by a few dollars during the summer months.  
13 There will also be an increase in the winter months; the magnitude of this will depend on the  
14 customer's end-use.

15 Q. What effect will the Staff's Residential rate design proposal have on a  
16 household using more than the normalized average annual usage?

17 A. The customer's bill will increase by a few dollars during the summer months.  
18 The decrease in the winter months will be greater than this increase, so the customer's will  
19 see a lower bill on an annual basis, as opposed to OPC's rate proposal.

20 Q. What is the Residential normalized average annual usage for each of the  
21 Staff's proposed service territories?

22 A. The monthly and annual normalized average usage is shown in the table  
23 below:



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DISTRICT	AVERAGE MONTHLY CCF	AVERAGE ANNUAL CCF
Northeast (NEMO)	70	835
West Central	65	778
Southeast (SEMO)	54	652

Q. Ms. Meisenheimer classifies customers as high use and low use. What type of equipment might a low or high user have in their household?

A. Since Ms. Meisenheimer didn't quantify her classifications of customers as "low users" or "high users", I assume that she means below average and above average Ccf usage. The table below shows the annual average or typical Ccfs associated with various Residential end uses:

<u>END USE</u>	<u>CCF (ANNUAL CONSUMPTION)</u>
Space-heating (Primary fuel) <sup>1</sup>	640 Ccf
Water-Heating (4 persons) <sup>2</sup>	288 Ccf
Gas Fireplace <sup>3</sup>	84 Ccf
Stove (Cooking – 4 people) <sup>4</sup>	24 Ccf

Note that these are estimated figures, and will be affected by usage, efficiency, age of equipment, weather, and other factors.

Q. Can you draw any conclusions from these tables?

A. Yes, I can. The low-usage customers on Atmos' system are most likely customers using the Atmos distribution system to do things like provide fuel for gas fireplace

<sup>1</sup> Table CE2-10c. Space-Heating Energy Consumption in U.S. Households by Midwest Census Region, 2001 – West North Central region

<sup>2</sup> Fuel Comparisons, South Jersey Gas, [www.sjindustries.com](http://www.sjindustries.com)

<sup>3</sup> ibid

<sup>4</sup> ibid

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1 logs, cook on a gas stove or use a gas water heater. The customers most likely to use more  
2 natural gas than the average are those heating their homes with natural gas.

3 Q. Will the utility's cost to serve a household using a natural gas fireplace for  
4 ambiance be less than the cost to serve a household using natural gas for space and water-  
5 heating?

6 A. No. As I explained in my rebuttal testimony (Ross, Rebuttal, p. 7, line 11 –  
7 p. 8, line 8), the same plant investment must be made for both users, and there will be no  
8 difference in billing, meter-reading, and other expenses.

9 Q. Under the OPC rate design, will the revenues received from a household using  
10 a natural gas fireplace for ambiance be less than the revenues received from a household  
11 using natural gas for space- and water-heating?

12 A. Yes, especially in the winter months.

13 Q. What is your conclusion?

14 A. The OPC rate design forces the households that depend on natural gas for their  
15 essential space and water-heating needs to subsidize those that use natural gas for non-  
16 essential purposes. The subsidy is greatest in the winter heating months, when the space-  
17 heating customers' gas use is highest, as are gas prices. This cost differential is not cost-  
18 justified, and this subsidy is unfair.

19 **REMOVES CUSTOMER INCENTIVE TO CONSERVE USAGE**

20 Q. What does Ms. Meisenheimer suggest as far as actions that a customer can  
21 take to reduce their bill, given the rate structure that OPC supports?

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1           A.     Ms. Meisenheimer suggests that a customer can lower their bill by reducing  
2 consumption. Another strategy that she suggests is that customers drop off the Atmos system  
3 to avoid paying a customer charge. (Meisenheimer, Rebuttal, p. 18, lines 8-11)

4           Q.     What are your comments on these bill-reduction techniques?

5           A.     These proposals are totally inappropriate as a sustainable, reliable  
6 conservation strategy. The suggestion that customers can lower their bill by reducing  
7 consumption ignores the fact that many customers have already lowered their bill as much as  
8 they possibly can using current information and resources that are available to them. The  
9 proposal that customers go on and off the Atmos system to avoid paying a customer charge  
10 ignores the costs this customer will face using this strategy, such as a disconnection charge or  
11 the late charges associated with building up the level of arrearages that would trigger a shut-  
12 off for nonpayment. At some point, the customer will have to pay a connection or  
13 reconnection fee to regain service. Other customers will end up having to pick up any fixed  
14 costs that the customer avoids by dropping off the system for a few months.

15          Q.     By collecting non-gas costs in a fixed monthly charge, will the customer lose  
16 all rewards from conservation?

17          A.     No. For the sake of example, let's say that the gas (PGA) charge is \$1.00 per  
18 Ccf. Under the Staff's proposal, a customer will benefit by \$1.00 for each Ccf not consumed.  
19 Lower usage due to either conservation or warm weather will still be rewarded, and Staff  
20 believes that customers will still have an incentive to practice conservation measures..

**PROVIDES LITTLE INCENTIVE FOR THE LDC TO PROMOTE**  
**CUSTOMER CONSERVATION**

Q. You said a moment ago that some customers had already conserved as much as possible using *the current information and resources available to them*. How can Staff's proposed rate design increase the informational and other resources to assist a Residential or Small General Service customer who wishes to adopt conservation measures?

A. If the Commission adopts Staff's proposed rate design, our natural gas utilities will no longer act against their shareholders' interests by assisting and educating customers with conservation/weatherization activities. The utility will not have any reason to avoid or limit this type of action. I am certain that, with the Commission's encouragement, LDC's will be willing to set up these programs.

Q. What incentive does a utility have to promote conservation activities if the Staff's proposed rate design is accepted?

A. The utility will have some customers whose bill increases because they are now paying the true cost of serving them. Since the utility can no longer offer an artificially low price to these customers, it will have to compete on non-price bases, such as providing service quality or assistance saving energy, which, given the present high level of gas commodity prices, will result in decreasing a customer's bill.

Q. What is another positive effect of the Staff's Delivery charge rate design?

A. Customers will have accurate price signals on which to base their decisions.

Q. How will the Staff's rate design benefit all customers by providing the correct price signal to potential customers?

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1           A.     A regulated utility's *obligation to serve* means that, if a customer in Atmos'  
2 service territory wishes to take natural gas service, they need only call the Company and  
3 request it. If customers in a new subdivision wish to connect to the Company's distribution  
4 system, their expected usage will not be a factor in the utility's decision to serve them.  
5 Currently, under the OPC rate design case, a household that uses only a gas fireplace faces an  
6 artificially low price for taking gas service; i.e., the customer charge plus a few dollars based  
7 on usage. Once this type of end-user decides to take service, the revenue from this household  
8 does not cover the Company's cost to provide service to the home. The true cost to provide  
9 service to this customer is subsidized by the larger users. Once a fixed charge is set that  
10 reflects the utility's actual cost to serve a Residential customer, I believe that fewer small  
11 customers will find it economic to sign up, thus reducing the intra-class subsidy flowing from  
12 the space-heating households to the others.

13                   **GUARANTEES COMPANY REVENUE REQUIREMENT**

14           Q.     What are your comments regarding OPC Witness Meisenheimer's assertions  
15 that Staff's rate design will guarantee the company's revenue requirement?

16           A.     While the Staff's rate design does reduce the Company's weather risk, the  
17 Company still faces other business risks. Risk, and the appropriate return is discussed by  
18 Staff witness Matthew Barnes.

19                   **MECHANISM IS DIFFERENT FROM THOSE IN OTHER STATES**

20           Q.     OPC Witness Meisenheimer faults Staff's rate design because it differs from  
21 that used in other states. How do you respond to this charge?

22           A.     Missouri is unique in that it is the only state of which Staff is aware whose  
23 legislature has enacted a law that provides gas (and electric) utilities the ability to institute

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1 weather and conservation adjustment surcharges. Staff's rate design attempts to avoid  
2 complicated schemes that result in phantom rates or volumes, such as the weather  
3 normalization adjustment proposed by Atmos in this case. Staff believes that its rate design  
4 is a simple, understandable, appropriate recovery mechanism that de-couples the cost of  
5 serving the customer from the customer's energy consumption. .

6 Q. Do you have any final comments in support of the Staff's proposed Delivery  
7 Charge rate design for the Residential and Small General Service class?

8 A. Yes, I do. I want to point out that this is a wonderful opportunity for this  
9 Commission to do a great deal of good for a great number of people. As the Commission is  
10 aware, the level of LIHEAP funds hasn't been increasing, and it remains to be seen whether  
11 funds will be appropriated for Missouri's Utilicare fund for the upcoming winter. There are  
12 some other utility, community, church and private funds available to help customers pay their  
13 utility bills, but these funds don't take up all the slack. Even after adding up these available  
14 resources, the need far outstrips the money Missouri has to meet that need; furthermore, that  
15 same need will be there next year, and the next, and the next, because we haven't done  
16 anything to change the situation. Paying a customers' bill or relaxing the standards for  
17 reconnection in the winter helps during a crisis, but as a long-term solution, it is inadequate.  
18 For many Atmos customers, conservation and efficiency are the measures that will make a  
19 permanent difference in their quality of life.

20 Missouri does not have unlimited funds to finance these measures, either, so it is  
21 going to take all of the stakeholders working together to provide the most efficient, effective  
22 use of the monetary and other resources that we do have. I believe that the LDCs have the  
23 most to offer due to their knowledge, their customer information database, and the

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1 relationships that they have with their customers and communities. However, there is one  
2 very real problem, and it is caused by the current rate design. **As long as fixed costs are**  
3 **collected on a volumetric basis, compelling an LDC to actively promote conservation**  
4 **means that the Commission is compelling them to act contrary to their shareholders'**  
5 **interests.**

6 We have an opportunity in Missouri to align the interests of shareholders and  
7 customers.. The Missouri legislature has spoken via Senate Bill 179 (SB 179), and is saying  
8 is that it believes that revenue stability for Missouri LDCs is desirable. I am aware that some  
9 parties do not consider that to be the role of regulators, but SB 179 clarifies that it is.

10 In this case, the Commission has before it two very different proposals on how small,  
11 homogenous, weather-sensitive customer rates should be designed:

12 Choice 1: The Commission rules in favor of the OPC proposal of status quo – a  
13 customer charge and a volumetric charge. The households that depend on natural gas for  
14 their space-heating needs will continue to subsidize the households who use their gas service  
15 only for cooking or using their gas fireplaces. At some point in the near future, the SB 179  
16 rules will be put in place and it will become an issue, so all the stakeholders will sit down  
17 together, and debate the merits of various complicated methods designed to make utility  
18 revenues less sensitive to customer usage. Parties will argue about the proper weather  
19 stations to use, and whether ten-year weather normals are better than thirty- year weather  
20 normals to use when calculating Heating Degree Days, and so on. Companies will be  
21 resistant regarding requests to expand their weatherization or conservation activities, as these  
22 actions have an adverse effect on their shareholders. Once the Commission makes their  
23 decision(s) on these matters, the LDCs will begin to convert or replace their computer billing

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1 systems to handle this complicated new task, and customer service personnel at the Company  
2 and the Commission will be trained for the upcoming job of trying to explain the rate  
3 structure to the 85 year-old customer that calls in asking why their rate goes up when his or  
4 her usage goes down.

5 The new system will go online. Some people's bill will increase, others will decrease. It will  
6 be business as usual, until the next rate case, when we do it all over again.

7 Choice 2: The Commission adopts the Staff's Delivery Charge proposal. Some  
8 customers' bills will increase by a few dollars, and some will decrease. As a condition of  
9 receiving a limited guarantee of revenue stability, the LDC should make strong and specific  
10 commitments regarding conservation and efficiency actions that will encourage and assist  
11 their customers in making this type of investment. The customer will be a full partner in the  
12 process, rather than a passive recipient of aid. Not only will consumers be educated about  
13 conservation and efficiency, but also about the nature and cost of the natural gas service they  
14 receive from the LDC, and they will be able to make informed decisions when spending their  
15 energy dollars. The Company will not have to file frequent rate cases asking for surcharge or  
16 other mechanisms with which to recover non-gas costs. Everybody wins.

17 **OPC CONCERNS REGARDING NON-RESIDENTIAL RATE DESIGN**

18 Q. What concerns did Ms. Meisenheimer express regarding the Staff's proposed  
19 rate design for the non-Residential customers?

20 A. Ms. Meisenheimer conducted an analysis of the SGS customer information,  
21 and used that to calculate rates for the proposed SGS and Medium General Service (MGS)  
22 classes. She then expressed concern that the rates would be discontinuous; ie, for a customer



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Anne Ross

1 whose use is right at the breakpoint for a class, they would pay a significantly different  
2 amount depending on the rate under which they were served.

3 Q. What are your comments on this matter?

4 A. As I stated in my direct testimony (Ross, Direct, p. 17, lines 8-22), a more  
5 detailed analysis will need to be done on these customers before rates can be calculated, and I  
6 listed three specific factors that should be considered when designing the rates. That is still  
7 my position.

8 **STAFF RESPONSE TO ATMOS WITNESS GARY L. SMITH**

9 Q. In Company witness Gary Smith's Rebuttal testimony, he discusses the  
10 concept of sculpting rates to lower the summer delivery charge by raising the winter delivery  
11 charge. Does Staff oppose this proposal?

12 A. No. However, Staff maintains that a single delivery charge for all months of  
13 the year would result in lower bills in the winter, when residential customers typically  
14 struggle to pay their gas bills.

15 Q. Does this conclude your testimony?

16 A. Yes

**ATMOS ENERGY COMPANY**  
**CASE NO. GR-2006-0387**  
**COMPARISON OF OPC AND STAFF RESIDENTIAL RATE DESIGN PROPOSAL IMPACT IN DOLLARS**

Current ATMOS District	Annual Ccf Usage ->	200	300	400	500	600	700	800	860	900	1000
<b>Non-gas Rate</b>											
<b>SEMO</b>											
Customer Charge	\$7.00	\$109.06	\$121.59	\$134.12	\$146.65	\$159.17	\$171.70	\$184.23	\$191.75	\$196.76	\$209.29
Commodity Charge	\$0.12529										
Proposed Delivery Charge	\$14.77	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24
Annual Bill Increase/Decrease		\$68.18	\$55.65	\$43.12	\$30.60	\$18.07	\$5.54	(\$6.99)	(\$14.51)	(\$19.52)	(\$32.05)
Monthly Bill Increase/Decrease		\$5.68	\$4.64	\$3.59	\$2.55	\$1.51	\$0.46	(\$0.58)	(\$1.21)	(\$1.63)	(\$2.67)
<b>NEELYVILLE</b>											
Customer Charge	\$7.25	\$137.56	\$162.84	\$188.12	\$213.40	\$238.68	\$263.96	\$289.24	\$304.41	\$314.52	\$339.80
Commodity Charge	\$0.25280										
Proposed Delivery Charge	\$14.77	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24	\$177.24
Annual Bill Increase/Decrease		\$39.68	\$14.40	(\$10.88)	(\$36.16)	(\$61.44)	(\$86.72)	(\$112.00)	(\$127.17)	(\$137.28)	(\$162.56)
Monthly Bill Increase/Decrease		\$3.31	\$1.20	(\$0.91)	(\$3.01)	(\$5.12)	(\$7.23)	(\$9.33)	(\$10.60)	(\$11.44)	(\$13.55)
<b>BUTLER</b>											
Customer Charge	\$7.00	\$119.91	\$137.86	\$155.82	\$173.77	\$191.72	\$209.68	\$227.63	\$238.40	\$245.59	\$263.54
Commodity Charge	\$0.17954										
Proposed Delivery Charge	\$19.43	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16
Annual Bill Increase/Decrease		\$113.25	\$95.30	\$77.34	\$59.39	\$41.44	\$23.48	\$5.53	(\$5.24)	(\$12.43)	(\$30.38)
Monthly Bill Increase/Decrease		\$9.44	\$7.94	\$6.45	\$4.95	\$3.45	\$1.96	\$0.46	(\$0.44)	(\$1.04)	(\$2.53)
<b>GREELEY</b>											
Customer Charge	\$5.00	\$123.84	\$155.76	\$187.68	\$219.60	\$251.52	\$283.44	\$315.36	\$334.51	\$347.28	\$379.20
Commodity Charge	\$0.31920										
Proposed Delivery Charge	\$19.43	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16	\$233.16
Annual Bill Increase/Decrease		\$109.32	\$77.40	\$45.48	\$13.56	(\$18.36)	(\$50.28)	(\$82.20)	(\$101.35)	(\$114.12)	(\$146.04)
Monthly Bill Increase/Decrease		\$9.11	\$6.45	\$3.79	\$1.13	(\$1.53)	(\$4.19)	(\$6.85)	(\$8.45)	(\$9.51)	(\$12.17)

**ATMOS ENERGY COMPANY**  
**CASE NO. GR-2006-0387**  
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Current ATMOS District	Annual Ccf Usage ->	200	300	400	500	600	700	800	880	900	1000
	Non-gas Rate										
<b>KIRKSVILLE</b>											
Customer Charge	\$7.00										
Commodity Charge	\$0.07500	\$99.00	\$106.50	\$114.00	\$121.50	\$129.00	\$136.50	\$144.00	\$148.50	\$151.50	\$159.00
Proposed Delivery Charge	\$21.79	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48
Annual Bill Increase/Decrease		\$162.48	\$154.98	\$147.48	\$139.98	\$132.48	\$124.98	\$117.48	\$112.98	\$109.98	\$102.48
Monthly Bill Increase/Decrease		\$13.54	\$12.92	\$12.29	\$11.67	\$11.04	\$10.42	\$9.79	\$9.42	\$9.17	\$8.54
<b>PALMYRA</b>											
Current Customer Charge	\$9.05										
Commodity Charge	\$0.07495	\$123.59	\$131.09	\$138.58	\$146.08	\$153.57	\$161.07	\$168.56	\$173.06	\$176.06	\$183.55
Proposed Delivery Charge	\$21.79	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48
Annual Bill Increase/Decrease		\$137.89	\$130.40	\$122.90	\$115.41	\$107.91	\$100.42	\$92.92	\$88.42	\$85.43	\$77.93
Monthly Bill Increase/Decrease		\$11.49	\$10.87	\$10.24	\$9.62	\$8.99	\$8.37	\$7.74	\$7.37	\$7.12	\$6.49
<b>HANNIBAL/CANTON/BOWLING GREEN</b>											
Customer Charge	\$7.25										
Commodity Charge	\$0.25280	\$137.56	\$162.84	\$188.12	\$213.40	\$238.68	\$263.96	\$289.24	\$304.41	\$314.52	\$339.80
Proposed Delivery Charge	\$21.79	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48	\$261.48
Annual Bill Increase/Decrease		\$123.92	\$98.64	\$73.36	\$48.08	\$22.80	(\$2.48)	(\$27.76)	(\$42.93)	(\$53.04)	(\$78.32)
Monthly Bill Increase/Decrease		\$10.33	\$8.22	\$6.11	\$4.01	\$1.90	(\$0.21)	(\$2.31)	(\$3.58)	(\$4.42)	(\$6.53)