

**Statement in opposition to requested Atmos Energy Corporation's rate increase.**

Kevin Suffern, Managing Attorney, Legal Services of Eastern Missouri, Northeast Missouri Office, June 29, 2010

Case number: GR-2010-0192; tracking numbers: GR-2006-0387, YG-2010-0426

Style of the case: In the Matter of Atmos Energy Corporation's Tariff Revision Designed to Implement a General Rate Increase for Natural Gas Service in the Missouri Service Area of the Company.

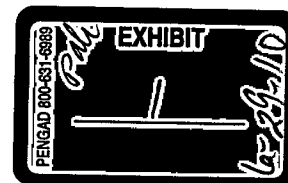
My name is Kevin Suffern and I am the managing attorney of the Northeast Missouri office of Legal Services of Eastern Missouri (LSEM) located in Hannibal. I am presenting this brief testimony on behalf of the low-income community served by Legal Services of Eastern Missouri.

Legal Services of Eastern Missouri, Inc. (LSEM) provides free civil legal assistance to elderly, disabled and low-income people in 21 counties in Eastern Missouri. The outcomes of our legal assistance help clients achieve

- Meaningful Economic Opportunity and economic stability: increased self-sufficiency by removing barriers to employment, reducing debt problems through enforcement of consumer law rights,
- Shelter: safe, stable, secure housing,
- Safety: Freedom from violence and abuse,
- Health Care, Security and Well-being: access to health care, basic nutrition, and disability benefits;
- Education: access to appropriate educational opportunities for long-term self-sufficiency,
- Family stability through assistance with family law issues.
- Human dignity and justice -- for example, systemic work for the homeless, civil rights, refugee assistance, etc

The 21 counties served by LSEM are:

Adair	Macon	Scotland
Clark	Marion	Shelby
Franklin	Monroe	St. Charles
Jefferson	Montgomery	St. Louis City
Knox	Pike	St. Louis County
Lewis	Ralls	Warren
Lincoln	Schuyler	Washington



Many of these counties would be affected by the proposed rate increase.

LSEM provides holistic services to help stabilize clients. To that end, we employ a team of lawyers, paralegals and social workers to provide not only legal representation, but also community education and outreach. We have several publications available, including a Senior Citizens Handbook regarding laws and programs affecting seniors, and a handbook on the rights and responsibilities of tenants and landlords entitled, *You and Your Landlord*.

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For over 50 years, LSEM has fought for equal access to justice, with the help of Bar Associations and volunteer lawyers. Our advocates work closely with over 150 other social service agencies, and participate in 36 collaborations and task forces to address systemic problems such as domestic violence and foreclosures.

In May and June, LSEM conducted a needs assessment survey of low-income persons throughout our service area and held focus groups with representatives of counties in Northeastern Missouri. Problems with paying utilities were among the top needs identified in both surveys and focus groups. LSEM knows also from the seasoned professionals in the social service agencies with whom we work that problems paying utilities are among the greatest problems destabilizing low-income households. The low-income population cannot survive these proposed rate increases yet they need the Atmos gas service to remain safe and healthy. Many public comments already filed by citizens affected by this proposed increase reflect the same conclusion.

Programs like "Budget Billing" simply are not sufficient to meet the needs of this population. Similarly, other programs designed to help low-income households, like the Low Income Home Energy Assistance Program (LIHEAP) which can assist low-income Missourians with heating bills during the months of December, January, February and March, and the Energy Crisis Intervention Program (ECIP) which assists low-income customers who have their gas or electric service discontinued for non-payment or have received a disconnect notice, are underfunded as it is and will never meet the increased burdens that this proposed increase will place on those least able to bear it.

According to the 2006 American Community Survey and 2000 U.S. Census, 14.3% of residents (about 1 in 7) in LSEM's 21 county geographical service area, which includes Adair, Clark, Franklin, Jefferson, Knox, Lewis, Lincoln, Macon, Marion, Monroe, Montgomery, Pike, Ralls, Schuyler, Scotland, Shelby, St. Charles, St. Louis, St. Louis City, Warren, and Washington counties, are considered below poverty level.<sup>1</sup> Eighteen percent (18%) of children under the age of 18 in the service area are living below the federal poverty level.<sup>2</sup> Additionally, approximately 3,400 of Missouri's 9,077 high school dropouts, or 37%, reside in LSEM's 21 county service area, according to the Annie E. Casey Foundation 2006 Kids Count/CLIKS Community Level Information on Kids.

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<sup>1</sup> LSEM's 21 county service area's total population is 2,246,434. See <http://factfinder.census.gov>.

<sup>2</sup> See <http://factfinder.census.gov>.

More than 324,393 people in LSEM's service area were surviving on marginal incomes below 125 percent of the Federal poverty threshold. When we consider homeless persons and immigrants who were likely not counted by the census, the number of low-income persons would only increase. The dire circumstances of these many thousands of low-income people must be considered by the PSC in evaluating whether to grant a rate increase for utilities.

A member of our client community recently explained the problem to us quite simply. She said, "With the trouble clients are having paying utility bills this large increase will make it much harder to pay. \$137.40 more\_a year is unreasonable. We cannot afford it."

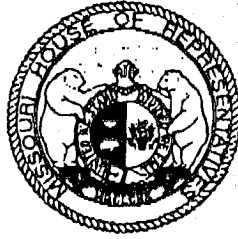
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Therefore, on behalf of the clients in our service area, I ask the PSC to reject the proposed rate increase.

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**MISSOURI HOUSE OF REPRESENTATIVES****RACHEL BRINGER**

State Representative  
District 6

June 29, 2010

Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
PO Box 360  
Jefferson City, MO 65102-0360

Dear Members of the Public Service Commission

I am writing to oppose the rate increase proposed by Atmos Energy that would affect individuals in the Sixth Legislative District of Marion and Ralls Counties. I am unable to attend the hearing in person because the legislature has been called into Extraordinary Session in Jefferson City. I am grateful to the Mayor of Palmyra, Loren Graham, for presenting this letter to the Commission on my behalf.

The proposed increase would cause significant hardship for senior citizens, working families, and individuals with disabilities. Due to increased unemployment and changes in the local, state, and national economy, many northeast Missouri families currently struggle to meet monthly obligations for food, shelter, and utilities, and for more than a year, local food banks and community service agencies have experienced a significant increase in requests for assistance from families in need. In addition, political subdivisions, including municipalities and school districts, have experienced a sharp decrease in revenue.

I respectfully request that the Public Service Commission deny the request of Atmos Energy for a rate increase,

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel L. Bringer".  
Rachel L. Bringer  
State Representative  
District 6

RLB:cm

Standing Committees: Judiciary, Rural Community Development, Budget  
Joint Committees: Legislative Research, Court Automation, and Education.

