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Issue: *Quality of Service*
Witness: *Lisa A. Kremer*
Sponsoring Party: *MOPSC*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *GR-2006-0387*
Date Testimony Prepared: *October 31, 2006*

MISSOURI PUBLIC SERVICE COMMISSION
UTILITY SERVICES DIVISION

REBUTTAL TESTIMONY

OF

LISA A. KREMER

ATMOS ENERGY CORPORATION

CASE NO. GR-2006-0387

Staff Exhibit No. *124*
Case No(s) *GR-2006-0387*
Date *11-30-06* Rptr *PF*

Jefferson City, Missouri
October 2006

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

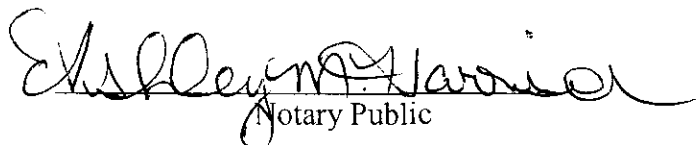
AFFIDAVIT OF LISA A. KREMER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

Lisa A. Kremer, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Rebuttal Testimony in question and answer form, consisting of 3 pages to be presented in the above case; that the answers in the foregoing Rebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.


Lisa A. Kremer

Subscribed and sworn to before me this 28th day of October 2006


Notary Public



ASHLEY M. HARRISON
My Commission Expires
August 31, 2010
Cole County
Commission #06699978

REBUTTAL TESTIMONY
OF
LISA A. KREMER
ATMOS ENERGY CORPORATION
CASE NO. GR-2006-0387

Q. Please state your name and business address.

A. Lisa A. Kremer, P.O. Box 360 Jefferson City, Missouri 65102

Q. Are you the same Lisa A. Kremer who filed direct testimony in this case?

A. Yes.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to indicate to the Commission that the Staff's position regarding the need for Atmos to report its call center performance metrics on a monthly rather than quarterly basis remains unchanged from its direct filing in this case. Staff's request is based upon concerns identified in my direct testimony with the Company's call center performance and upon call center concerns expressed by Atmos' Missouri customers during at least two local public hearings held during the Company's present rate case. These two local public hearings were held in Sikeston and Kirksville, Missouri on September 25 and 26, 2006, respectively. One customer concern made at the Sikeston local public hearing specifically identified call center response time and the specific customer testimony is attached as Exhibit 1.

The Staff continues its request that the Commission order Atmos to improve its call center performance to the benchmarks identified in Case No. GM-2000-312. Those benchmarks include a maximum allowable abandoned call rate of 9% and average speed of

1 answer of 119 seconds. In addition, the Staff requests that the Company file with the
2 Commission its plan to improve its call center performance as well as a disaster recovery plan
3 that addresses continued call center operations during outages and call handling when a
4 specific Company call center is not operational.

5 Q. Are there any other issues to address in your rebuttal testimony?

6 A. Yes. In addition to the above, the Staff believes Atmos' Missouri customers
7 may benefit from increased education regarding the Company's budget billing program.
8 After review of Atmos Missouri Commission complaints dating back to January 2004, it
9 appears that some customers who are or have been enrolled in the Company's budget billing
10 program may not have had complete understanding of how the program operates.

11 Q. What specific budget billing educational efforts should Atmos make?

12 A. To increase the Company's customer education efforts regarding its budget
13 billing program, the Staff requests that the Commission require Atmos to develop
14 informational material that will be mailed to all Atmos Missouri customers who request to
15 participate in the Company's budget bill program. If requests for budget billing are received
16 through the Company's call centers, specific information about customer responsibilities
17 when participating in the program should be provided to those Missouri customers at the time
18 the request for budget billing is made.

19 Such customer education should address that customers are required to make timely
20 payments with specific indication that two delinquent events in a 12-month period will
21 terminate their budget bill status. Customers should also be instructed that they need to pay at
22 least the amount due on the budget bill and any amount paid less than the amount due will be
23 considered a delinquent event. Customers should be advised that their budget bill amount will

1 change each month because the amount is based upon the previous 12-month rolling average
2 of actual bills and that the 12-month budget bill average does not include the current bill.
3 Finally, an annual mailing to all of Atmos' Missouri budget bill customers reminding them of
4 the requirements of the Company's budget billing program would be of benefit.

5 Q. Are there any call center training matters to address regarding the Company's
6 budget billing program for its Missouri customers?

7 A. Yes. Upon reading the Atmos call center notes made on one customer's
8 account who testified at the local public hearing held in Kirksville, Missouri, on
9 September 26, 2006, and after listening to a recording of the actual call the customer placed to
10 Atmos on February 20, 2006, it is the Staff's opinion that the Atmos call center did not have
11 complete understanding of how the Company's budget bill program worked for Missouri. In
12 both the recording of the call and the notes made on the customer account, the call center
13 appeared to be unaware that the customer's current bill was not calculated in the budget bill
14 amount and that the budget bill amount was based upon the previous 12-month bill average.
15 It is the Staff's opinion that the Company's call centers that serve Missouri customers should
16 be adequately trained to correctly and clearly respond to customer questions regarding budget
17 bill amounts and calculations.

18 Q. Does this conclude your rebuttal testimony?

19 A. Yes.

1 MS. TERRELL: Yes, I am.

2 JUDGE DIPPELL: Okay. Go ahead with your
3 comments.

4 MS. TERRELL: Thank God for the Commission
5 because when you're the only game in town,
6 without that, you can do whatever you want to.
7 So I'm glad that there are some regulations
8 that help. But, first of all, we own a little
9 one-bedroom duplex that is rented to a person
10 who has had four heart by-passes, has no
11 income. I had the gas shut off for the summer
12 to save costs because it wasn't going to be
13 used anyway and they inform me that when we
14 turn it back on in the winter, just to turn it
15 on is going to cost \$37. Why? You know, it's
16 been in service all year until May and I had to
17 turn it off for three months. Also, if they
18 charge me that \$37, maybe they can help
19 somebody attend to the switchboard because I
20 have been on hold for as long as 30 minutes.
21 In my business -- if I ran my business that
22 way, I wouldn't have a business, but after all
23 when you're a monopoly and you own it, then
24 they can do that.

25 JUDGE DIPPELL: Thank you. Mr. Poston,