

Exhibit No.:  
Issues: Tariff Issues  
Witness: Thomas M. Imhoff  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Rebuttal Testimony  
Case No.: GM-2000-312

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**REBUTTAL TESTIMONY**

**OF**

**THOMAS M. IMHOFF**

**CASE NO. GM-2000-312**

**Jefferson City, Missouri**

**March 2000**

**FILED<sup>2</sup>**  
**MAR 01 2000**  
Missouri Public  
Service Commission

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**REBUTTAL TESTIMONY**

**OF**

**THOMAS M. IMHOFF**

**ATMOS ENERGY CORPORATION AND**

**ARKANSAS WESTERN GAS COMPANY**

**D/B/A ASSOCIATED NATURAL GAS COMPANY**

**CASE NO. GM-2000-312**

Q. Please state your name and business address.

A. Thomas M. Imhoff, P.O. Box 360, Jefferson City, Missouri 65102.

Q. By whom are you employed and in what capacity?

A. I am a Regulatory Auditor IV with the Missouri Public Service Commission (Commission).

Q. Please describe your educational background.

A. I attended Southwest Missouri State University at Springfield, Missouri, from which I received a Bachelor of Science degree in Business Administration, with a major in Accounting, in May 1981. In May 1987, I successfully completed the Uniform Certified Public Accountant (CPA) examination and subsequently received the CPA certificate. I am currently licensed as a CPA in the State of Missouri.

Q. What has been the nature of your duties with the Commission?

A. From October of 1981 to December 1997, I worked in the Accounting Department of the Commission, where my duties consisted of directing and assisting with various audits and examinations of the books and records of public utilities operating

1 within the State of Missouri under the jurisdiction of the Commission. On January 5,  
2 1998, I assumed my current position of Regulatory Auditor IV in the Tariffs/Rate Design  
3 section of the Gas Department, where my duties consist of analyzing applications,  
4 reviewing tariffs and making recommendations based upon those evaluations.

5 Q. Have you previously filed testimony before this Commission?

6 A. Yes. A list of cases in which I have filed testimony before this  
7 Commission is attached as Schedule 1 to my rebuttal testimony.

8 Q. With reference to Case No. GM-2000-312, have you made an examination  
9 and study of the material filed by Atmos Energy Corporation (Atmos or Company) and  
10 Arkansas Western Gas Company d/b/a Associated Natural Gas Company (ANG) relating  
11 to the proposed transfer of certain assets and Certificates of Public Convenience and  
12 Necessity of ANG's Missouri territories to the Company?

13 A. Yes, I have.

14 Q. What is the purpose of your rebuttal testimony?

15 A. The purpose of my rebuttal testimony is to present the Commission Staff's  
16 (Staff) position relating to the Company's proposed handling of ANG's current tariffs  
17 after the sale.

18 Q. How did the Company originally propose to adopt and operate the existing  
19 approved rates, rules and regulations of ANG?

20 A. The Company originally proposed to file an adoption notice stating that  
21 the Company adopts, ratifies and makes its own in every respect, as if the same had been  
22 originally filed by it, all tariffs, schedules, rules and regulations of ANG prior to the sale.

1 The Company wanted to file this adoption notice under the United Cities Gas Company  
2 (UCG) name, labeling the ANG property as another district of UCG.

3 Q. Is Staff concerned about the Company's original proposal?

4 A. Yes. UCG currently has its own tariff on file with the Commission.  
5 Labeling ANG's current tariff with UCG's name could possibly cause confusion among  
6 UCG employees as to which tariff provisions are applicable to which district, and  
7 consequently result in unintended and detrimental service to its ANG customers. Both  
8 the UCG tariff and the ANG tariff have different tariff sheets containing schedules and  
9 rules and regulations. In other words, Company personnel may apply a UCG tariff to an  
10 ANG customer, thereby, inflicting a detriment on the ANG customer. Furthermore, it  
11 would also be administratively confusing for the Staff if one utility had two completely  
12 different sets of tariffs.

13 Q. Have the Company and Staff discussed this problem?

14 A. Yes. The Company has indicated to Staff that it is willing to modify its  
15 original position. Instead of using the UCG name on the adoption notice, the Company  
16 plans to file an adoption notice under the Atmos Energy name without any reference to  
17 UCG.

18 Q. Does Staff support the Company's revised position?

19 A. Yes.

20 Q. Will Atmos be operating ANG's system?

21 A. According to the Company's plan, the operation of the Missouri properties  
22 of ANG will be delegated to the UCG division of Atmos.

1 Q. Will the Company maintain two separate sets of tariffs for UCG and ANG  
2 properties indefinitely?

3 A. No. In the Company's response to Staff Data Request No. 3501, the  
4 Company indicated plans to consolidate the tariffs within the next several months after  
5 the merger. During this time, the Company intends to work with the Staff to ensure that  
6 this process goes smoothly. Consolidating the tariffs of UCG and ANG would make the  
7 administration and operation of Atmos's property simpler and possibly more efficient.  
8 UCG and ANG tariffs currently have different rates for customers requiring certain  
9 services that are not directly related to gas usage. Items such as bad check charges, line  
10 extensions, reconnects, etc. have rates associated with them that have been based upon  
11 costs that were developed from different utility companies. Therefore, the rates and  
12 charges which fall out after consolidating tariffs may result in rates much different than  
13 those contained in either UCG's or ANG's current tariff.

14 In the Staff's opinion, consolidating these tariffs should be handled only in the  
15 context of a rate case. This would ensure that all customers of the Company would have  
16 appropriate notification and an opportunity to express concerns or support for the  
17 consolidation of these tariffs. A rate case would also give the Staff, OPC, intervenors and  
18 any other interested party the opportunity to analyze any changes that may be proposed to  
19 effectuate consolidation of the tariffs.

20 Q. Does this conclude your rebuttal testimony?

21 A. Yes it does.  
22  
23

SHARON S WILES  
NOTARY PUBLIC STATE OF MISSOURI  
COLE COUNTY  
MY COMMISSION EXP. AUG. 23, 2002

ATMOS ENERGY CORPORATION AND ARKANSAS WESTERN COMPANY  
D/B/A ASSOCIATED NATURAL GAS COMPANY  
CASE NO. GM-2000-312

Summary of Cases in which prepared testimony was presented by:  
THOMAS M. IMHOFF

<u>Company Name</u>	<u>Case No.</u>
Terre-Du-Lac Utilities	SR-82-69
Terre-Du-Lac Utilities	WR-82-70
Bowling Green Gas Company	GR-82-104
Atlas Mobilfone Inc.	TR-82-123
Missouri Edison Company	GR-82-197
Missouri Edison Company	ER-82-198
Great River Gas Company	GR-82-235
Citizens Electric Company	ER-83-61
General Telephone Company of the Midwest	TR-83-164
Missouri Telephone Company	TR-83-334
Mobilpage Inc.	TR-83-350
Union Electric Company	ER-84-168
Missouri-American Water Company	WR-85-16
Great River Gas Company	GR-85-136
Grand River Mutual Telephone Company	TR-85-242
ALLTEL Missouri, Inc.	TR-86-14
Continental Telephone Company	TR-86-55
General Telephone Company of the Midwest	TC-87-57
St. Joseph Light & Power Company	GR-88-115
St. Joseph Light & Power Company	HR-88-116
Camelot Utilities, Inc.	WA-89-1
GTE North Incorporated	TR-89-182
The Empire District Electric Company	ER-90-138
Capital Utilities, Inc.	SA-90-224
St. Joseph Light & Power Company	EA-90-252
Kansas City Power & Light Company	EA-90-252
Sho-Me Power Corporation	ER-91-298
St. Joseph Light & Power Company	EC-92-214
St. Joseph Light & Power Company	ER-93-41
St. Joseph Light & Power Company	GR-93-42
Citizens Telephone Company	TR-93-268
The Empire District Electric Company	ER-94-174
Missouri-American Water Company	WR-95-205
Missouri-American Water Company	SR-95-206
Union Electric Company	EM-96-149
The Empire District Electric Company	ER-97-81
Missouri Gas Energy	GR-98-140
Laclede Gas Company	GR-98-374
Laclede Gas Company	GR-99-315