

BEFORE THE  
GEORGIA PUBLIC SERVICE COMMISSION  
STATE OF GEORGIA

IN RE:

ATLANTA GAS LIGHT COMPANY'S  
NOTICE OF CONTINUED SUSPENSION  
OF DISCONNECTIONS FOR NON-  
PAYMENT AND JOINT PETITION OF  
ATLANTA GAS LIGHT COMPANY AND  
PUBLIC SERVICE COMMISSION STAFF  
TO CREDIT BASE RATE CHARGES  
BILLED TO MARKETERS

DOCKET NOS. 42315, 43115

**STIPULATED SETTLEMENT AGREEMENT**  
**OF PARTIAL PAYMENT ALLOCATION METHODOLOGY ISSUE**

The below Parties hereby file this executed Stipulated Settlement Agreement regarding the resolution of the partial payment allocation methodology issue relating to uncollected Atlanta Gas Light Company ("AGL") base charges arising from COVID-19 moratorium on disconnections for non-payment (also known as Shut Offs for Non Payment or "SONPs") and the Commission's Orders of April 30, 2020 and June 22, 2020 in the above matter for consideration by the Commission. Approval of this Stipulation will resolve the partial payment allocation issue for the customers' bills that were eligible for SONP but were not disconnected because of the moratorium ("SONP-eligible customers" as defined herein).

WHEREAS, AGL issued a moratorium on SONPs on March 14, 2020 due to the COVID-19 pandemic, and extended that moratorium again on April 9, 2020 indefinitely; and

WHEREAS, the Commission issued Orders, dated April 30, 2020 and June 22, 2020, in Docket Numbers 42315 and 43115 in regards to Atlanta Gas Light Company's Notice Of Continued Suspension Of Disconnections For Non-Payment And Joint Petition Of Atlanta Gas Light Company And Public Service Commission Staff To Credit Base Rate Charges Billed To Marketers; and

WHEREAS, by Commission Order of June 22, 2020, the Commission provided AGL with the approval to lift the suspension of disconnections effective July 1, 2020; and

WHEREAS, by Commission Order of October, 2020, the Commission ruled: (a) that SONP Eligible Customers are defined as customers that were or could have been submitted by a Marketer for disconnection but were not disconnected because of the moratorium on SONPs that was in place from March 14 until June 30; and (b) that such credits to Marketers for the customer base charges for SONP Eligible Customers shall apply through the date the SONP eligible customer has been disconnected by AGL.

WHEREAS, the Stipulating Parties agree that this Stipulation relates to the allocation methodology for partial payments between (a) the AGL base charges billed to Marketers and paid by Marketers and (b) the non-AGL base charges billed by Marketers to SONP-eligible customers; and

WHEREAS, the Marketers, AGL, and Staff have been meeting for several months to resolve the issues related to the methodology to determine how subsequent partial recoveries by Marketers should be credited.<sup>1</sup>

NOW THEREFORE, the Marketers, Staff, and AGL stipulate to the following resolution of the SONP-eligible customers' partial payment allocation methodology, both for AGL base charges and non-AGL base charges, related to the SONP moratorium.

1. "SONP-eligible customers" are defined as customers that were or could have been submitted by a Marketer for disconnection but were not disconnected because of the moratorium on SONPs that was in place from March 14 until June 30.
2. "Unpaid AGL base charges" are AGL base charges a Marketer paid to AGL for SONP-eligible customers and rebilled to such SONP-eligible customers, which remain unpaid by

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<sup>1</sup> See D 5 under "Additional Considerations the Commission May Want to Address in a New Docket" found on page 13 of 18, in Attachment A of the Final Commission Order dated 4/30/2020.

the Marketers' customers.

3. "AGL base charges" are defined as all rates, fees and charges billed by AGL to Marketers, for which the rate, fee or charge was set through a traditional rate case or an alternative form of regulation (as opposed to charges resulting from an order of the Commission regarding a Capacity Supply Plan).
4. "Non-AGL base charges" are commodity charges, other fees and charges, and taxes billed by Marketers to the SONP-eligible customers.
5. SONPs that were submitted to AGL between March 1 and March 13, but not completed due to the moratorium will be eligible and included as "SONP-eligible customers."
6. Marketers may request a credit for unpaid AGL base charges for SONP-eligible customers, by submitting a detailed request in accordance with this Stipulation that is certified as being true, correct and accurate by an accounting professional and by an officer of the Marketer.
7. Marketers will not include unpaid AGL base charges associated with SONPs completed prior to March 14, 2020 in any partial payment or base charge credit calculations or allocations.
8. AGL will issue credits to Marketers for unpaid AGL base charges that Marketers paid to AGL for SONP-eligible customers for services through the date the SONP-eligible customer was disconnected by AGL according to the applicable method described below.
9. Each Marketer will account for all partial payments made on SONP-eligible customers' accounts at the following two times:
  - a. As soon as practicable after all of the Marketers' SONP-eligible customers' accounts that will be written off have been written-off,<sup>2</sup> and

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<sup>2</sup> The Marketers stated in the Answers to the Commission's First Set of Data Requests Docket 43115 that Marketers have different timeframes for writing off bad debt. Write-off means that a Marketer will sell the unpaid accounts to a third party and seek to recover a portion of the total amount owed, based on the

- b. 12 months after all of the Marketers' SONP-eligible customers' accounts were written-off.<sup>3</sup>

Marketers will include revenues received from the sale of unpaid accounts or from other collection efforts based on the selection in the #1 or #2 Method to reduce the effect on AGL's Revenue True Up ("RTU") adjustment, and

10. Each Marketer will choose one of the following two methods to determine the allocation of partial payments between AGL base charges and non-AGL base charges. Marketers may elect to use either:

1. Method 1 -- 60/40 Split

- a. This method assumes that 40% of partial payments were made towards AGL base charges and that 60% of partial payments were made towards non-AGL base charges.
- b. Each Marketer that selects this method will determine the total amount of partial payments made. For each account, 60% of partial payments on SONP-eligible customers' accounts will be applied to non-AGL base charges, and 40% will be applied to AGL base charges.
- c. For the accounting to be made as soon as practicable after write-off, each Marketer will determine the total amount of unpaid AGL base charges. Marketers may submit a request for a credit of the unpaid

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agreement between the Marketer and the third party. The Marketers stated that revenues from third parties are usually a much-reduced amount.

<sup>3</sup> Marketers will include as partial payment revenues amounts received from the sale of unpaid accounts or from other collection efforts to reduce the effect on AGL's Revenue True Up ("RTU") adjustment.

AGL base charges, reduced by the 40% of partial payments on SONP-eligible customers' accounts, calculated as provided above.

d. Example (for illustration only):

i. A Marketer has a total of \$150,000 of unpaid AGL base charges associated with SONP-eligible customers' accounts.

ii. The Marketer collects \$10,000 in partial payments associated with SONP-eligible customers' accounts.

40% of \$10,000 is \$4,000.

iii. The Marketer submits a request to AGL for a \$146,000 credit for unpaid AGL base charges.

iv. For the accounting to be made 12 months after write-off, each Marketer that selects this method will determine the total amount of partial payment revenue received for SONP-eligible customers' accounts that is incremental to the revenue included in the initial accounting following write-offs. Marketers will then remit 40% of such revenue to AGL to reduce the amount that would otherwise be recovered by AGL through the RTU.

v. Additionally, for the accounting to be made 12 months after write-off, each Marketer will remit to AGL the full amount of the AGL base charge for SONP-eligible customers' accounts that are paid in full.

2. Method 2 –Actual Amounts

- a. This method uses the actual charges and payments to determine the allocation of partial payments on SONP-eligible customers' accounts.
- b. For the accounting to be made as soon as practicable after the write offs, each Marketer that selects this method will determine the total partial payment made on SONP-eligible customers' accounts and create a spreadsheet that includes:
  - i. customer account number;
  - ii. total unpaid bill amount;
  - iii. customer charges broken down into AGL base charges and non-AGL base charges;
  - iv. total amount paid; and
  - v. the actual percentage of AGL base charges, by customer.
- c. The Marketer will then calculate and apply the actual percentages of AGL base charges and non-AGL base charges to determine dollar amounts.
- d. Example (for illustration only):
  - i. A Marketer has a total of \$150,000 of unpaid AGL base charges associated with SONP-eligible customers' accounts.
  - ii. The Marketer collects \$10,000 in partial payments associated with SONP-eligible customers' accounts, of which \$3,200 were for AGL base charges.

- iii. \$150,000 less \$3,200 is \$146,800.
  - iv. The Marketer submits a request to AGL for a \$146,800 credit for unpaid AGL base charges.
  - v. For the accounting to be made 12 months after write-off, each Marketer that selects this method will determine the total amount of partial payment revenue received for SONP-eligible customers' accounts that is incremental to the revenues included in the initial accounting following write-offs. Marketers will then determine the amount that should be allocated to AGL base charges, based on the calculation, and such revenue to AGL to reduce the amount that would otherwise be recovered by AGL through the RTU.
  - vi. Additionally, for the accounting to be made 12 months after write-off, each Marketer will remit to AGL the full amount of the AGL base charge for SONP-eligible customers' accounts that are paid in full.
- e. Whichever option is selected by a Marketer must be used at the time of charge-off and 12 months after charge-off. There can be no change in the selected methodology during this process to address this SONP moratorium, although this restriction would not necessarily apply to additional suspensions of SONPs in the future, if any.

Respectfully submitted this 13th day of October, 2020.

*Jim Fletcher*

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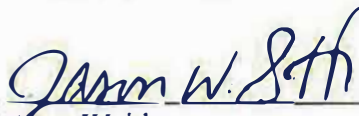
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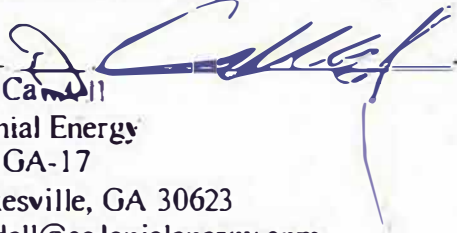
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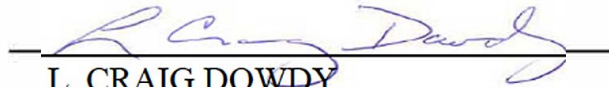
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