

**Kellie Martinec**

---

**From:** Jill Penna [REDACTED] >  
**Sent:** Monday, February 03, 2014 11:17 AM  
**To:** rulescoordinator  
**Cc:** Thomas Brocato; Eileen McPhee; Holly Whitehurst  
**Subject:** GUD No. 10308 Initial Comments of Atmos Cities Steering Committee  
**Attachments:** GUD No. 10308 Initial Comments of Atmos Cities Steering Committee.PDF

Attached are the Initial Comments of the Atmos Cities Steering Committee.

Jill Penna  
Lloyd Gosselink Rochelle & Townsend, P.C.  
816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
(512) 322-5834 (Direct Line)  
(512) 472-0532 (Fax)

**IRS CIRCULAR 230 NOTICE:** To the extent this communication contains a statement relating in any way to federal taxes, that statement is not a "covered opinion" and was not written or intended to be used, and it cannot be used, by any person (I) as a basis for avoiding federal tax penalties that may be imposed on that person, or (II) to promote, market or recommend to another party any transaction or matter addressed herein.

**CONFIDENTIALITY NOTICE:**

This email (and all attachments) is confidential, legally privileged, and covered by the Electronic Communications Privacy Act. Unauthorized use or dissemination is prohibited. If you have received this message in error please delete it immediately. For more detailed information click <http://www.lglawfirm.com/email-disclaimer/> .

**NOT AN E-SIGNATURE:**

No portion of this email is an "electronic signature" and neither the author nor any client thereof will be bound by this e-mail unless expressly designated as such as provided in more detail at [www.lglawfirm.com/electronic-signature-disclaimer/](http://www.lglawfirm.com/electronic-signature-disclaimer/) .

**GAS UTILITIES DOCKET NO. 10308**

**PROPOSED NEW 16 TEX. ADMIN.  
CODE § 7.475, RELATING TO  
MUNICIPALITY CONTACT  
INFORMATION FOR NOTICE OF  
DISCONNECTION FOR NON-  
PAYMENT FOR NON-  
SUBMETERED MASTER  
METERED MULTIFAMILY  
PROPERTIES, TO IMPLEMENT  
HOUSE BILL 1772 (83RD  
LEGISLATURE, REGULAR  
SESSION, 2013)**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**BEFORE THE  
RAILROAD COMMISSION  
OF TEXAS**

**INITIAL COMMENTS OF THE ATMOS CITIES STEERING COMMITTEE**

The Atmos Cities Steering Committee (“ACSC”) appreciates the opportunity to submit comments regarding the Railroad Commission of Texas (“RRC” or “Commission”) Gas Utilities Docket (“GUD”) No. 10308, *Proposed New 16 Tex. Admin. Code § 7.475, Relating to Municipality Contact Information for Notice of Disconnection for Non-Payment for Non-Submetered Master Metered Multifamily Properties, to Implement House Bill 1772 (83<sup>rd</sup> Legislature, Regular Session, 2013)*. ACSC supports the proposed rules and offers one comment for a minor change.

**COMMENTS ON THE PROPOSED RULE**

House Bill 1772 added Texas Utilities Code §§ 104.352 and 104.353, which direct the Commission to develop a mechanism by which a municipality may provide the Commission with the contact information of the municipality’s authorized representative to whom a notice of disconnection must be sent. The rule does not provide the method by which the Commission will make the municipalities’ contact information available to the public. The Commission should publish that contact information on its website for easy access by members of the general public. ACSC offers the following revision to the proposed rule:

§7.475. Municipality Contact Information for Notice of Disconnection for Non-Payment for Non-submetered Master Metered Multifamily Properties.

(a)-(b) No changes to the proposed rule as published.


(c) The Commission shall make the municipalities' contact information available to the public by publishing it on the Commission's website.

#### CONCLUSION

ACSC supports the Commission's adoption of this rule as a measure of protection for the health and lives of tenants and appreciates the opportunity to comment on the proposed rule. ACSC respectfully urges the Commission to consider the foregoing comments and to adopt a rule consistent with same.

Respectfully submitted,

LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.  
816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
512-322-5800  
512-472-0532 (Fax)

  
\_\_\_\_\_  
THOMAS L. BROCATO  
State Bar No. 03039030

EILEEN L. McPHEE  
State Bar No. 24060273

ATTORNEYS FOR THE ATMOS CITIES  
STEERING COMMITTEE