



Response to

**Louisiana Public Service Commission**

Request for Proposal 25-16

Outside Engineering Consultant

in

Docket U-TBD, Atmos Energy Corporation

Renewal of Rate Stabilization Clause Rider

Submittal Date:

January 03, 2026

Prepared and submitted by:

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## A: Executive Summary

Clear Valley Advisors LLC is pleased to submit this response to the December 12, 2025, Louisiana Public Service Commission RFP 25-16, for an Outside Engineering Consultant. We hope to have the opportunity to assist the Commission and its Staff in the review and disposition of Atmos Energy's application for the renewal of its Rate Stabilization Clause Rider.

Byron Coy PE has 30+ years of applied experience in energy pipelines, including natural gas distribution systems. His background and experience are well aligned with the requirements of this work.

We understand the time-period for the completion of the review, analysis and testimony for this RFP is estimated at 12 months, based on the content of Atmos Energy's forthcoming filing and whether the matter is contested.

Clear Valley Advisors LLC participated in a similar project with the Mississippi Public Utilities Staff in 2025. Based on that recent experience, the estimated total costs are:

Work Hours	\$69,500
Expenses	\$6,750

## B: Qualifications & Experience

Clear Valley Advisors (CVA) LLC is a sole-member LLC company. CVA offers engineering and safety regulations consulting services to those with an interest in energy pipelines and related facilities.

Byron Coy PE is the principle active participant and owner of CVA, with over 30 years of applied experience within the regulated pipeline industry and with the US Department of Transportation, Pipeline Safety Administration. That experience includes natural gas distribution utilities, gas transmission and

storage, and hazardous liquid transmission. Over that time, he has engaged with 100's of companies, regulators, financial analysts, and public interest groups on a wide range of pipeline topics: design criteria, engineering factors, construction, operations, risk management, maintenance practices, emergency response, and presided or participated in over 30 incident/accident investigations. He has made a wide variety of public presentations, including several occasions at the annual Louisiana Pipeline Safety Conference.

Byron Coy PE would be the direct point of contact for this effort. He is a registered professional engineer, with a bachelor's degree in electrical engineering.

In 2025, he assisted the Mississippi Public Utilities Staff with data analysis and presentation materials as a subject matter expert witness in an Atmos Energy Rate Case.

#### References:

- Mississippi MPUS, Atmos Rate Case, Emily Kruger, 601-961-5471
- Colonial Pipeline, Program Evaluations, Quintin Frazier, 678-762-2270
- Prometrix Consulting, Partnership Assessment, Gabe Sierra, 703-638-8637
- PBF Energy, Regulatory Records Schedule, Jerry Johnson, 269-998-7557
- Steven Giambrone, Louisiana C&E, 225-342-5505

A full resume is in the Appendix.

## C: Plan of Action

CVA is prepared to assist the Commission's in-house Staff in its review, analysis and preparation for discussion and testimony, whether for a stipulated agreement or contested hearing.

Initial guidance from the Commission would clearly influence the content and sequence of these steps:

- Receive initial guidance from the Commission Staff
- Review Atmos Energy's Application for Renewal
- Analyze Atmos LA's annual safety report data over recent years
- Periodic discussions/updates with Staff and other topical consultants
- Prepare and submit Data requests to Atmos
- Supplement reported data with Atmos Data responses
- Potential for second round of Data requests
- Assess Atmos' practices in relative risk & integrity investments
- Tabulate/Review safety compliance & safety management performance
- Assist in preparing briefing materials for use by Commission Staff
- Prepare materials for direct expert testimony
- Participate in conclusionary discussions and prepare related materials

CVA acknowledges the prohibition of the use of any AI type platforms when reviewing and analyzing information related to this effort.

CVA fully understands that the Commission and Staff shall have the right to determine how all tasks will be carried out, including the setting of deadlines and scope of applied efforts.

To help ensure a successful outcome, CVA expects to participate in numerous informal discussions, meetings and conferences with the Commission, its Staff, and other outside consultants.

## D: Cost Proposal

We understand the time-period for the completion of the review, analysis and testimony for this RFP is estimated at 12 months, based on the content of Atmos Energy's forthcoming filing and whether the matter is contested.

CVA participated in a similar project with the Mississippi Public Utilities Staff in 2025. Based on the recent MPUS project, we estimate total costs to be:

Work Hours            \$69,500

Expenses              \$6,750

These estimated totals are derived from hourly rates as follows:

\$230/hr	For time during research, analytics, preparation of materials, reports, informal meetings, and discussions
\$290/hr	For time in Hearing Room; either at counsel tables, in the gallery or during direct testimony
\$150/hr	For time during authorized travel

If selected, CVA would bill at the end of each month; only for actual hours of work performed and costs incurred. Billing rate will not be altered over the course of this effort.

Any expenses will be disclosed separately with proof provided by receipts. The total of allowable expenses will not exceed 20% of the total billed for actual work hours.

## E: Conflicts of Interest

Clear Valley Advisors LLC does not possess any conflicts of interest that would impair its ability to service the Commission for the purposes of this RFP.

Specifically, Clear Valley Advisors does not currently have any active projects with Atmos Energy in any State, nor any other natural gas utility companies in Louisiana.

## F: Other Current Representations

CVA does not currently have any other active projects or ongoing interactions with the Louisiana Public Service Commission.

## G: Conclusion

CVA appreciates this opportunity to respond to the Commission's RFP to serve as an Outside Engineering Consultant; to assist Staff in the review and analysis of the Atmos Energy filing. As detailed in the sections above, CVA has extensive experience in a broad range of engineering, operational, and safety attributes of natural gas distribution systems.

Byron Coy has been developing, applying, and interpreting pipeline safety regulations for decades; along with their practical application.

The combination of this background with the recent Mississippi MPUS project makes CVA a solid choice for this effort.

Byron remains available for any questions about this proposal and looks forward to your favorable decision to use Clear Valley Advisors for this project.

 01-03-2025

Byron Coy PE

## Appendix

### **Byron Coy, Jr PE**

Downingtown, PA 19335

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#### Profile ...

A career dedicated to managing and mitigating pipeline safety risks. 30+ years of experience in pipeline operations and the application of pipeline safety regulations. Work experience within the pipeline industry and with USDOT, Pipeline and Hazardous Materials Safety Administration.

#### Professional Career ...

- 2022 – Independent Consultant  
Clear Valley Advisors, LLC
- Program Audits for compliance with Pipeline Safety Regulations
  - Subject Matter Expert in Pipeline Litigation
  - Safety Assessments & Root Cause Analysis
- 2016 – 2022 Senior Technical Advisor  
US-DOT, Pipeline & Hazardous Materials Safety Administration
- Established inspection criteria for Emission Reduction Regulations
  - Led implementation of Underground Natural Gas Storage Regulations
- 2007 – 2016 Director, Northeast & Mid-Atlantic Areas  
US-DOT, Pipeline & Hazardous Materials Safety Administration
- Presided over incident/accident investigations on Gas Distribution, Gas Transmission and Hazardous Liquid pipelines
  - Oversight and management of Pipeline Safety with a staff of 30, for Safety Compliance Programs across 14 States, responsible for pipeline safety operations for  $\frac{1}{4}$  of the US population
  - Developed Control Room Regulations, inspection criteria, and training program for staff engineers
  - Track and verify pipeline integrity restoration projects across the region



- Develop, deploy and support of Pipeline Safety Regulations

1995 – 2007 Program Manager & Engineer

US-DOT, Pipeline & Hazardous Materials Safety Administration

- Develop and manage Inspection Programs
- Hazardous Liquid Integrity Management Regulations, Integral member of development team
- Respond and conduct incident/accident investigations
- Conduct regulatory compliance audits

1993 – 1995 SCADA Project Manager

Trigon Engineering

Prior to 1993 Penn Fuel Gas

Sun Pipeline

Atlantic Pipeline

## Significant Communications Engagements ...

- Transportation Safety Institute, Adjunct Instructor for Underground Natural Gas Storage
- International Pipeline Conference, Organizing Committee, Contributed as Presenter for Pipeline Leak Detection Systems: Industry Regulations, Strategies, Challenges, and Technology
- Texas Gas Association, Presentation for Natural Gas Emission Reduction
- Pipeline Podcasts: Pipeline Records, Team Training, Inspection Planning
- American Gas Association, Presentations for Emission Reduction Expectations
- International Pipeline Conference, Organizing Committee, Contributed with the Paper Meeting the New Regulatory Requirements for Pipeline Control Room Management
- US Senate Field Hearing, Pipeline Accidents and Emergency Response
- American Petroleum Institute, Subcommittee on Cybernetics, Certificate of Appreciation for Dedication, and efforts in planning, coordinating, and presenting at the API Workshop on Computational Pipeline Monitoring
- American Gas Association, Presentation, Roll Out of Control Room Management Requirements

- Coordination and Planning with Transportation Safety Administration, Cybersecurity Awareness & Hygiene
- American Petroleum Institute, Presentation, Leak Detection for Hazardous Liquid Pipelines
- National Transportation Safety Board, Hearings on SCADA Technology
- American Petroleum Institute, Presentation, Mitigation of Risk for Leaks and Failures
- Transportation Safety Institute, Adjunct Instructor for Control Room Mgt and SCADA Technology
- Atlantic Pipeline Corp. Board of Directors, Proposal for acquisition of new Control System
- Olympic Pipeline Accident, Accident Investigation Team
- Metro New York City Gas Supply Conference, Presentation, Impact of Control Room Regulations
- Meetings with various land-owner consortiums about Pipeline expansion projects
- United States Coast Guard, Presentation, Emergency Preparedness Planning
- American Gas Association, Presentation on the Controller Regulations Project
- Office of the Inspector General, Hosting staff on typical pipeline operator inspection
- Tredyffrin Township, Zoning Board Hearing for permitting Satellite Terminal
- New England Pipeline Safety Seminar, Presentation on PHMSA Inspection Programs
- Department of Justice, Development and Explanation of Technical Evidence
- Federal Railroad Administration, Controller Regulations Development Project
- Environmental Protection Agency, Separation of Jurisdictional Boundaries
- American Petroleum Institute, Member of Cybernetics Sub-Committee

## Education & Awards ...

Bachelor of Science, Electrical Engineering, 1986  
Drexel University, Philadelphia, PA

Professional Engineering License  
Electrical Engineering, issued by State of Pennsylvania  
Initial License: 1996, Renewal Year: 2027

US Department of Transportation, Team Award for Innovation  
Fulfillment of Requirements in Pipeline Safety Acts 2011 & 2016

American Petroleum Institute & Liquid Energy Pipeline Association  
Recognition for Development and Support of the Control Room Forum

US Department of Transportation, Superior Achievement Award  
Excellence in Pipeline Inspection and Enforcement Programs

US Department of Transportation, Superior Achievement Award  
Excellence in Pipeline Accident Investigations

US Department of Transportation, Superior Achievement Award  
Excellence in Control Room Management Regulations

National Association of Radio and Telecommunications Engineers, Inc.  
Certified Engineer, Class I  
RF Radiating Endorsements, Control Systems, Land Mobile & Microwave Systems

## Training ...

Topic -----	Provider -----
Principles of Process Safety Technology	ABS Group Inc.
Safety Evaluation of Gas Pipeline Systems	USDOT, Transportation Safety Institute
Gas (Fluid) Measurement	University of Texas
Safety Evaluation of Pipeline Control Rooms	USDOT, Transportation Safety Institute
Investigating Human Fatigue Factors	NTSB Academy
Principles of Underground Natural Gas Storage	Western Michigan University
Safety Evaluation of Pipeline SCADA Systems	USDOT, Transportation Safety Institute
Root Cause Analysis	Conger & Elsea, Inc.
Safety Evaluation of Hazardous Liquid Pipelines	USDOT, Transportation Safety Institute
Inspection of Petroleum Storage Tanks	Code West
Leading Organizational Change	USDA, Graduate School
Inspector Team Building Workshop	USDOT
Assessment of Operator Qualification	USDOT
Corrosion Control Systems	USDOT, Transportation Safety Institute
Evaluation of Gas Pipeline Corrosion Control	USDOT, Transportation Safety Institute
Fatigue Management in Shift Work	Jay Miller & Associates

Pipeline Safety Regulations & Compliance	USDOT, Transportation Safety Institute
Joining Pipeline Materials	USDOT, Transportation Safety Institute
Emergency Response / Accident Investigation	Commonwealth of PA, PUC
Liquefied Natural Gas Safety Technology	USDOT, Transportation Safety Institute
Risk Management Programs	USDOT, Office of Pipeline Safety
Pipeline Failure Investigation Techniques	USDOT, Transportation Safety Institute
Gas Pressure Regulation and Overpressure	USDOT, Transportation Safety Institute
Gas Pipeline Odorization	Commonwealth of PA, PUC
Safety Evaluation of Breakout Tanks	USDOT, Transportation Safety Institute
Underground Natural Gas Storage	USDOT, Transportation Safety Institute
Hazardous Materials Awareness	Robert J. Meyers & Associates
Safety Evaluation of Inline Inspection	USDOT, Transportation Safety Institute
Welding Inspection	USDOT, Transportation Safety Institute
Technical Representative for Contracts Mgt	NPI, Inc.
Personnel Supervision	USDA, Graduate School
General Management Practices	USDA, Graduate School
Reliability Assessment for Pipeline Operators	USDOT, Transportation Safety Institute
Pipeline Integrity Management Programs	USDOT, Transportation Safety Institute
Operator Qualification Programs	USDOT, Transportation Safety Institute

## Incident/Accident Investigations ...

(Either presided over or participated in)

Pipeline Operator	Commodity	State	Year
Texas Eastern	Natural Gas	PA	2016
Consolidated Edison	Natural Gas	NY	2015
National Fuel Gas	Natural Gas	NY	2015
SoCal Gas	Natural Gas	CA	2015
PECO Energy	Natural Gas	PA	2014
Philadelphia Gas	Natural Gas	PA	2014
Columbia Gas	Natural Gas	WV	2014
Transco	Natural Gas	NJ	2013
Millennium	Natural Gas	NY	2011
Buckeye	Haz Liquid	NY	2011
Kinder-Morgan	Haz Liquid	NJ	2010
PECO Energy	Natural Gas	PA	2010
Harbor	Haz Liquid	NJ	2010
Colonial	Haz Liquid	NJ	2010
Eastern Gas	Natural Gas	WV	2009
Buckeye	Haz Liquid	NY	2009
Transco	Natural Gas	VA	2008
Sun	Haz Liquid	PA	2008
Buckeye	Haz Liquid	PA	2008
Algonquin Gas	Natural Gas	RI	2008
Columbia Gas	Natural Gas	WV	2006
Colonial	Haz Liquid	VA	2006
Dominion	Natural Gas	WV	2006
Mobil	Haz Liquid	PA	2005
Sun	Haz Liquid	PA	2005
City of Richmond	Natural Gas	VA	2004
Sun	Haz Liquid	PA	2000
Olympic	Haz Liquid	WA	1999
Sun	Haz Liquid	NJ	1997
Columbia Gas	Natural Gas	PA	1996
Texas Eastern	Natural Gas	NJ	1994