BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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In the Matter of the General Investigation Into the Appropriateness of Certain Sections of the Kansas Corporation Commission's Electric and Natural Gas Billing Standards Related to On-Premises Collections

Docket No. 15-GIMX-344-GIV

KNOCK AND COLLECT COMPLIANCE REPORT OF ATMOS ENERGY CORPORATION FOR THE PERIOD OCTOBER 1, 2023 THROUGH MARCH 31, 2024

Atmos Energy Corporation ("Atmos Energy"), in accordance with the Order of the Kansas Corporation Commission ("Commission") in the above captioned docket dated September 24, 2020, respectfully submits the attached semi-annual report relating to its participation in the pilot program eliminating the knock and collect requirement prior to disconnecting utility service ("Pilot Program").

1. The attached semi-annual compliance report dated April 15, 2024, which is incorporated herein by reference, contains the following information for the period October 1, 2023 through March 31, 2024 relating to the Pilot Program:

- a. The number of bills sent out each month.
- b. Number of 10-Day Disconnect Notices by month.
- c. Number of Non-Pay Shut Off Orders by month.
- d. Number of communication attempts at the 5- to 7-day mark by month.
- e. Number of accounts making payments after the 5- to 7-day communication attempt and method of payment by month.
- f. Number of communication attempts at the 48-hour mark by month.
- g. Number of accounts making payments after the 48-hour communication attempt and before the 24-hour communication attempt and method of payment by month.

- h. Number of phone call attempts at the 24-hour mark prior to disconnection by month.
- i. Number of door tags performed by month during the Cold Weather Rule.
- j. Number of accounts making payments after the 24-hour communication attempt and before disconnection and method of payment by month.
- k. Not Applicable.
- 1. Number of disconnections by month.
- m. Number of accounts paid for reconnection and method of payment by month.
- n. Distribution of the time between disconnection, payment and reconnection.
- o. The manner in which the utility informed customers of any available bill assistance programs during the reporting period.
- p. Knock and Collect Waiver of On-Premise Collection Customer Survey.
- q. Customer complaints with respect to this pilot program.
- r. Cost savings attributable to this pilot program.
- 2. The most recent customer survey is included in the attached semi-annual compliance

report.

WHEREFORE, Atmos Energy requests the Commission accept the attached compliance

report.

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James G. Flaherty, #11177 ANDERSON & BYRD, LLP 216 S. Hickory ~ P.O. Box 17 Ottawa, Kansas 66067 (785) 242-1234, telephone (785) 242-1279, facsimile jflaherty@andersonbyrd.com Shelly M. Bass, Associate General Counsel Atmos Energy Corporation 5430 LBJ Freeway, 1800 Three Lincoln Centre Dallas, Texas 75240 (972) 855-3756 (972) 855-3080, facsimile shelly.bass@atmosenergy.com Attorneys for Atmos Energy Corporation

VERIFICATION

STATE OF KANSAS COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states:

That he is the attorney for Atmos Energy Corporation named in the foregoing Knock and Collect Compliance Report of Atmos Energy Corporation for the Period October 1, 2023 Through March 31, 2024 and is duly authorized to make this affidavit; that he has read the foregoing and knows the contents thereof; and that the facts set forth therein are true and correct.

James G. Flaherty

SUBSCRIBED AND SWORN to before me this 15th day of April, 2024.



Ronda Rossman-Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 15th day of April, 2024, addressed to:

Aaron Bishop aaron.bishop@atmosenergy.com

Kathleen R. Ocanas Kathleen.Ocanas@atmosenergy.com

Shelly M. Bass shelly.bass@atmosenergy.com

Ann L. Stichler ann.stichler@blackhillscorp.com

Rob Daniel Rob.Daniel@blackhillscorp.com

Douglas J. Law douglas.law@blackhillscorp.com

Joseph R. Astrab j.astrab@curb.kansas.gov

Todd E. Love <u>t.love@curb.kansas.gov</u>

David W. Nickel d.nickel@curb.kansas.gov

Shonda Rabb <u>s.rabb@curb.kansas.gov</u>

Della Smith d.smith@curb.kansas.gov

Angela M. Cloven regulatory.information@libertyutilities.com

Cathryn J. Dinges Cathy.Dinges@evergy.com Cindy S. Wilson cindy.s.wilson@westarenergy.com

Roger W. Steiner roger.steiner@evergy.com

Nicole A. Wehry nicole.wehry@evergy.com

Anthony Westenkirchner anthony.westenkirchner@evergy.com

Brian G. Fedotin <u>b.fedotin@kcc.ks.gov</u>

Carly R. Masenthin c.masenthin@kcc.ks.gov

Douglas Shepherd dshepherd@kec.org

Susan B. Cunningham <u>scunningham@kepco.org</u>

Janet L. Buchanan janet.buchanan@onegas.com

Robert Elliott Vincent robert.vincent@onegas.com

Glenda Cafer gcafer@morrislaing.com

Lindsay Campbell lcampbell@pioneerelectric.coop

ames G. Flaherty

Atmos Energy Corporation Knock and Collect Waiver of On-Premise Collection Pilot Docket No. 15-GIMX-344-GIV

> Semi-Annual Compliance Report April 15, 2024

Overview

On August 17, 2017, the Commission issued an order in Docket No. 15-GIMX-344-GIV, approving a pilot program waiving the knock and collect requirement for the electric utilities Southern Pioneer and Evergy Kansas Central (hereafter referred to as "Pilot Program"). In lieu of amending its Billing Standards, the Commission approved this Pilot Program to evaluate the potential customer benefits and impacts of the approved alternative customer contact methods. On September 24, 2020, the Commission granted a motion for Atmos Energy to be made party to the Pilot Program. Participation in the program allows Atmos Energy to replace on-premise collection visits with alternative contact methods during the Pilot Program period. This is Atmos Energy's compliance report for the Pilot Program, which covers the months of October 2023 through March 2024.

Month	Number of Bills
October 2023	141,299
November 2023	141,497
December 2023	141,927
January 2024	142,270
February 2024	142,793
March 2024	142,849

A. Number of Bills Sent Out (By Month):

B. Number of 10-Day Disconnect Notices (By Month):

Month	10-Day Disconnection Notices
October 2023	1,404
November 2023	1,871
December 2023	2,232
January 2024	4,537
February 2024	6,909
March 2024	5,464

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Month	Residential Non- Pay Shut Off Order	Non-Residential Non-Pay Shut Off Order
October 2023	681	37
November 2023	22	44
December 2023	3	58
January 2024	22	35
February 2024	53	139
March 2024	1,197	109

D. Number of Communication Attempted at the 5-7 Day Mark (By Month):

Month	Phone Call	Text Message	Email
October 2023	1,114	0	0
November 2023	1,525	0	0
December 2023	1,588	0	0
January 2024	2,703	0	0
February 2024	3,483	0	0
March 2024	3,683	0	0

E. <u>Number of Accounts Showing Payments Received After the 5-7 Day Communication Attempt</u> and Before the 48-hour Communication Attempt and Methods of Payment:

Payment Method	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24
ACH	4	2	0	2	3	13
Bank Draft	3	5	7	11	13	3
Energy Assistance	0	0	0	0	0	0
Payment Kiosk	0	0	0	0	0	0
Lockbox	2	1	1	7	19	13
Credit/Debit Card	43	45	41	85	90	374
Online Bank/Bill	2	0	5	5	2	3
Рау						
Pay Location	7	0	0	3	2	1

Month	48-Hour Phone Calls	48 Hour Text Messages
October 2023	951	0
November 2023	967	0
December 2023	1,135	0
January 2024	1,522	0
February 2024	2,925	0
March 2024	3,169	0

F. Number of Communication Attempts at the 48-Hour Mark (By Month):

G. <u>Number of Accounts Recording Payments After the 48-Hour Communication Attempt and</u> Before the 24-Hour Communication Attempt and Method of Payment (By Month):

Payment Method	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24
ACH	1	0	0	0	0	3
Bank Draft	5	0	2	4	2	3
Energy Assistance	0	0	0	0	0	0
Payment Kiosk	0	0	0	0	0	0
Lockbox	3	2	0	1	12	3
Credit/Debit Card	36	19	16	35	60	205
Online Bank/Bill	2	0	0	0	6	6
Рау						
Pay Location	4	0	0	1	1	1

H. Number of Phone Call Attempts at the 1-Day Mark Prior to Disconnection (By Month):

Month	Phone Call	Text Message
October 2023	875	0
November 2023	903	0
December 2023	998	0
January 2024	1,608	0
February 2024	2,544	0
March 2024	2,750	0

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Month	Meter Total
October 2023	0
November 2023	0
December 2023	0
January 2024	0
February 2024	0
March 2024	0

J. <u>Number of Accounts Making Payments After the 24-Hour Communication Attempt and</u> <u>Before Disconnection and Method of Payment:</u>

Payment Method	Oct- 23	Nov- 23	Dec- 23	Jan- 24	Feb- 24	Mar- 24
ACH	0	0	0	1	1	5
Bank Draft	5	1	0	2	4	6
Energy Assistance	0	0	0	0	0	0
Payment Kiosk	0	0	0	0	0	0
Lockbox	1	0	0	0	0	1
Credit/Debit Card	60	40	29	115	85	136
Online Bank/Bill Pay	0	0	0	0	2	3
Pay Location	0	0	1	2	0	2

K. Number of knock and collects on day of disconnection:

This item is not applicable.

L. <u>Number of Disconnections (By Month):</u>

Month	Residential Disconnections	Non-Residential Disconnections			
October 2023	104	3			
November 2023	9	9			
December 2023	0	4			
January 2024	16	6			
February 2024	38	35			
March 2024	30	32			

M. Number of Customer Accounts Re	equesting Reconnection	(and Method of Payment -By
<u>Month):</u>		

Payment Method	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24
ACH	0	0	0	0	0	0
Bank Draft	15	5	1	2	11	17
Energy Assistance	0	0	0	0	0	0
Payment Kiosk	0	0	0	0	0	0
Lockbox	1	1	0	0	1	5
Credit/Debit Card	67	11	0	12	12	11
Online Bank/Bill Pay	1	0	0	0	2	1
Pay Location	5	1	0	0	1	2

N. Distribution of the Time Between Disconnection, Payment and Reconnection:

Month	Days Between Disconnection and Payment	Days Between Payment and Reconnection			
October 2023	4.4	1.1			
November 2023	2.4	0.9			
December 2023	1.5	1.0			
January 2024	1.9	0.5			
February 2024	1.7	0.9			
March 2024	2.0	1.0			

O. The Manner in which Atmos Energy Informed Customers of Any Available Bill Assistance Programs During the Reporting Period:

Bill Assistance Program

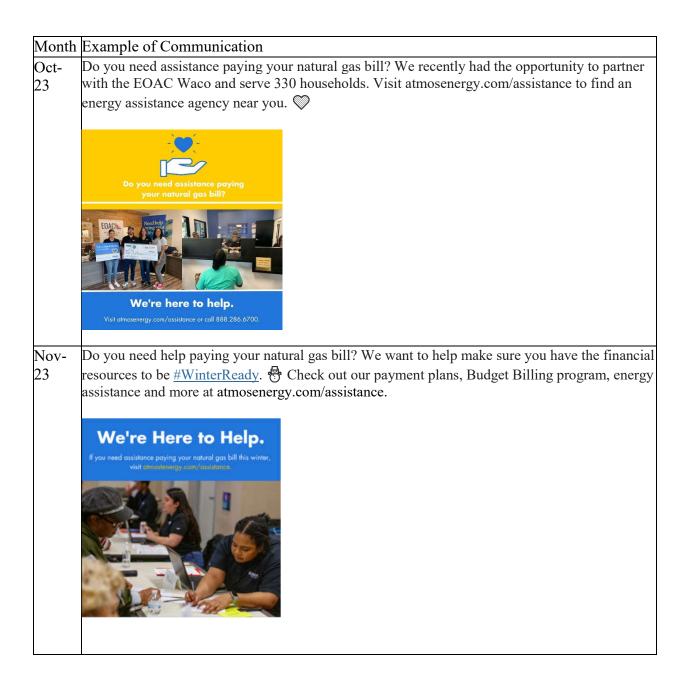
Atmos Energy informs its customers about financial assistance programs assistance (energy assistance, payment options, alternate payment plans) and ways to save energy in a variety of ways. Our customer service representatives continually offer bill payment assistance resources to customers in need. Atmos Energy also includes extensive information on available assistance through multiple online platforms open to both customers and company personnel. This information is kept current and available to customers on the Company's website at https://www.atmosenergy.com/customer-service/bill-payment-assistance

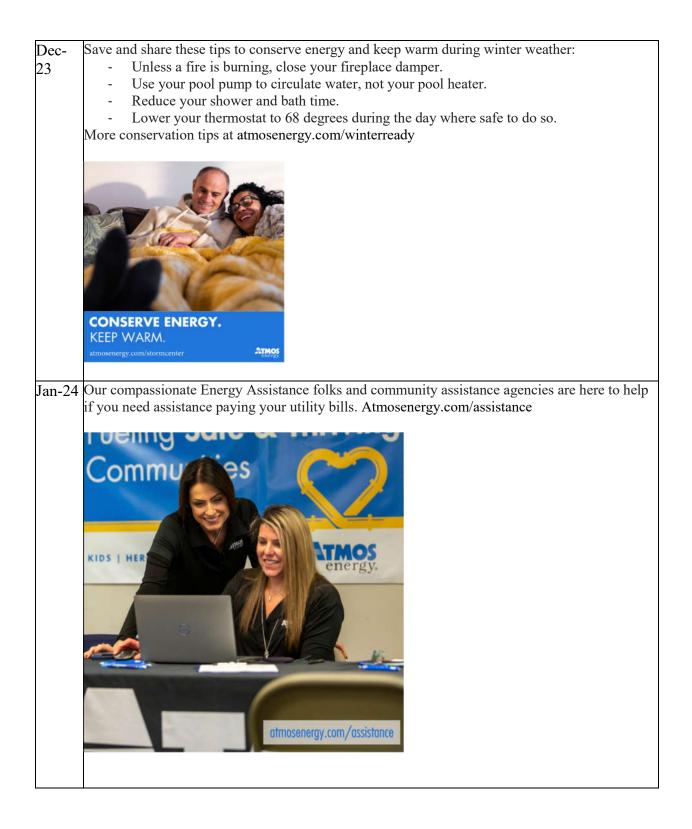
Customer Bills

Atmos Energy customers in Kansas received information on their monthly statements and email (for customers enrolled in electronic billing) informing them that financial assistance and bill payment options are available, in addition to tips on how to save energy and money.

Social Media

Atmos Energy's social media platforms (Facebook, Twitter, Instagram, and LinkedIn) featured information on financial assistance and bill payment options, in addition to tips on how to save energy and money. See the enclosed document for social media posts during this time. The table below highlights the social media posts during this time.





Feb-Helping our communities stay warm during the year is one of our highest priorities. To connect Low Income Home Energy Assistance Program (LIHEAP) funding with customers in need, our 24 energy assistance team partners with over 150 local agencies that distribute funding to help customers pay their utility bills across the 1,400 communities we serve. #LIHEAPActionDay #ProtectLIHEAP energy LIHEAP ACTION DAY Visit atmosenergy.com/assistance to locate an energy assistance agency that administers LIHEAP funds near you. Mar-Looking to make some room in your wallet this Spring? Making a few household changes can 24 significantly impact your natural gas and other energy bills. Plus, you can lower your home's carbon emissions when you use energy wisely! Learn more at atmosenergy.com/ways-tosave/manage-energy-home/ energy TMO WAYS TO SAVE WAYS TO SAVE THIS SPRING THIS SPRING Let in the sun's warmth on sunny days by Reduce your shower and bath time, which can account for 40 percent of your hot water use. opening draperies & blinds in your home.

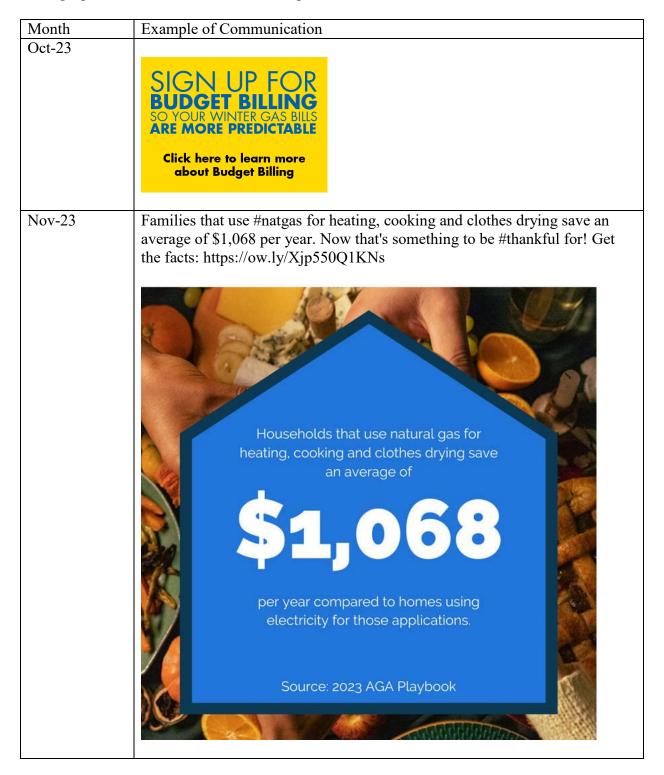
Website

The Atmos Energy website continually features information on financial assistance and bill payment options, in addition to tips on how to save energy and money.

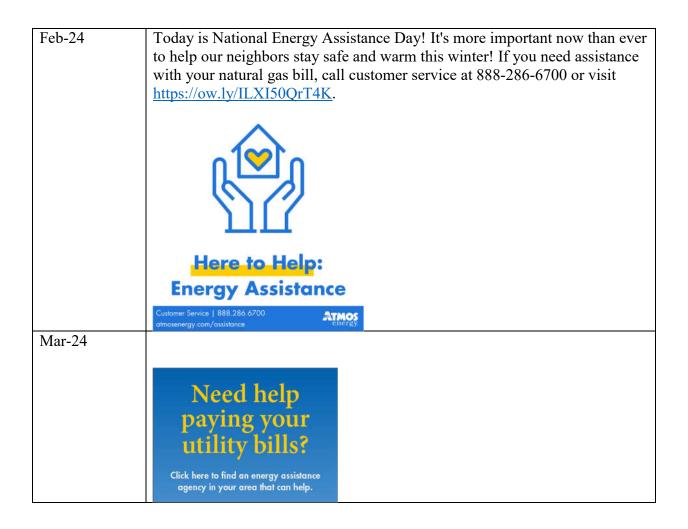
- <u>https://www.atmosenergy.com/</u>
- <u>https://www.atmosenergy.com/customer-service/bill-payment-assistance</u>
- <u>https://www.atmosenergy.com/ways-to-save/manage-energy-home</u>
- https://atmosenergy.com/news/join-atmos-energy-preparing-winter/

Bill Messaging

Atmos Energy included messaging in our bills that informed customers how to find bill payment assistance options, financial assistance, and energy-saving tips. The table below highlights the messaging included in customer bills during this time.



Dec-23	Save and share tips found at https://ow.ly/E07250QlhE8 to conserve energy
	and keep warm during winter weather! 🍪
	<image/> <text><image/></text>
Jan-24	Did you know today is #CutYourEnergyCostsDay? Check out
	https://ow.ly/h29650QoOAI for household changes that can reduce your natural gas and other energy bills!
	<section-header></section-header>



Press Releases

In December, "Our goal is to keep customers safe and warm," Dawn Tripp, public relations manager for Kansas Gas Service, said. "We know that during the winter time, it can be especially challenging, so we want to be here. We're providing account information, the type of information that you need to complete your LIEAP application." <u>https://www.ksn.com/news/local/program-that-helps-with-winter-utility-bills-begins/</u>

In February, Atmos Energy is helping by donating funds for energy assistance agencies for customers who need help paying their "natural gas bills, past-due debt, deposits and services charges." <u>https://mysweetcharity.com/2024/02/atmos-energy-warms-the-hearts-and-homes-of-the-senior-source-clients-with-75000/</u>

In March, the increasingly longer days that daylight saving time will bring when it arrives this Sunday, March 10, remind us that spring is just around the corner. The imminent time change also serves as a seasonal milestone to consider performing a few routine safety checks, and Atmos Energy encourages customers to inspect your home's natural gas piping and appliances and confirm smoke detectors and carbon monoxide alarms are in working condition. https://www.atmosenergy.com/news/atmos-energy-recommends-customers-add-routine-household-safety-their-spring-checklist/

P. Knock and Collect Waiver of On-Premise Collection Customer Survey:

The results of the most recent customer survey are attached to this report.

Q. Customer Complaints Regarding the Knock and Collect Waiver Pilot Program:

Atmos Energy has not received any customer complaints regarding its participation in the Pilot Program between the months of October 2023 and March 2024.

R. Cost Savings Attributable to the Knock and Collect Waiver Pilot Program

Because Atmos Energy is unable to disconnect remotely, it is still required to make physical trips to disconnect, reconnect and to perform requisite safety checks. Therefore, any potential cost savings experienced during this time period is *de minimis*.

Are you aware of the new service disconnection procedures due to the Knock and Collect program?	Count	%
Yes	11	24.4
No	34	75.6
Total	45	100.00
To what degree have you been impacted by the change to Knock and Collect procedures?		
Not Impacted	33	73.3
Somewhat Impacted	10	22.2
Negatively Impacted	2	4.4
Total	45	100.00
How would you rate Atmos Energy's payment options?		
Completely meets my needs	32	71.1
Somewhat meets my needs	13	28.9
Total	45	100.00

Total Surveyed

4,047

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													d to:	Submitte		Submitte Submitte	d Are you aware of the new service		
S	erial	Submiss	i Submissio	on				Current	Remote IP	Submitte Sub	omitte Submitte	е	Entity	d to:		d to: to: Entity	disconnection procedures due to the	To what degree have you been impacted by the	How would you rate Atmos Energy
n	umber	on ID	URI	Created	Completed	Changed	ls draft	page	address	d by: ID d by	y: Title d by: URI	L Language	type	Entity ID Locked	Sticky Note:	s Entity title URL	Knock and Collect program?	change to Knock and Collect procedures?	payment options?
5	1	9994	/react_we	ebfor 4/9/2024 15:48	4/9/2024 15:48	4/15/2024 14:59	0		10.4.2.10	0		en		0	1		No	Negatively impacted	Somewhat meets my needs
5	2	9995	/react_we	ebfor 4/9/2024 15:48	4/9/2024 15:48	4/15/2024 14:59	0		10.4.2.10	0		en		0	1		Yes	Somewhat impacted	Completely meets my needs
5	3	9996	/react_we	ebfor 4/9/2024 15:49	4/9/2024 15:49	4/15/2024 14:59	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
54	4	9997	/react_we	ebfor 4/9/2024 15:49	4/9/2024 15:49	4/15/2024 14:59	0		10.4.2.10	0		en		0	1		No	Somewhat impacted	Somewhat meets my needs
5	5	9998	/react_we	ebfor 4/9/2024 15:50	4/9/2024 15:50	4/15/2024 14:59	0		10.4.2.10	0		en		0	1		Yes	Somewhat impacted	Completely meets my needs
5	6	9999	/react_we	ebfor 4/9/2024 15:50	4/9/2024 15:50	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
5	7	10000	/react_we	ebfor 4/9/2024 15:52	4/9/2024 15:52	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		Yes	Not impacted	Completely meets my needs
5	3	10001	/react_we	bfor 4/9/2024 15:53	4/9/2024 15:53	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Somewhat impacted	Completely meets my needs
5	Э	10002	/react_we	ebfor 4/9/2024 15:54	4/9/2024 15:54	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
6	0	10003	/react_we	bfor 4/9/2024 15:54	4/9/2024 15:54	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Negatively impacted	Completely meets my needs
6	1	10004	/react_we	bfor 4/9/2024 15:55	4/9/2024 15:55	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Somewhat impacted	Completely meets my needs
6	2	10005	/react_we	bfor 4/9/2024 15:56	4/9/2024 15:56	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		Yes	Not impacted	Completely meets my needs
6	3	10006	/react_we	bfor 4/9/2024 15:57	4/9/2024 15:57	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
6	4	10007	/react_we	bfor 4/9/2024 15:57	4/9/2024 15:57	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
6	5	10008	/react_we	bfor 4/9/2024 16:02	4/9/2024 16:02	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
6	6	10009	/react_we	bfor 4/9/2024 16:16	4/9/2024 16:16	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
6	7	10010	/react_we	bfor 4/9/2024 16:16	4/9/2024 16:16	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
6	3	10011	/react_we	bfor 4/9/2024 16:17	4/9/2024 16:17	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
6	9	10014	/react_we	ebfor 4/9/2024 16:44	4/9/2024 16:44	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
7	C	10015	/react_we	ebfor 4/9/2024 16:55	4/9/2024 16:55	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Somewhat meets my needs
7	1	10016	/react_we	ebfor 4/9/2024 17:01	4/9/2024 17:01	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
7	2	10017	/react_we	ebfor 4/9/2024 17:31	4/9/2024 17:31	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Somewhat meets my needs
7	3	10018	/react_we	ebfor 4/9/2024 17:36	4/9/2024 17:36	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
74	4	10019	/react_we	ebfor 4/9/2024 17:46	4/9/2024 17:46	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		No	Not impacted	Somewhat meets my needs
7	ō	10020	/react_we	ebfor 4/9/2024 17:52	4/9/2024 17:52	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		Yes	Not impacted	Somewhat meets my needs
7	6	10021	/react_we	ebfor 4/9/2024 18:03	4/9/2024 18:03	4/15/2024 15:00	0		10.4.2.10	0		en		0	1		Yes	Not impacted	Completely meets my needs
7	7	10022	/react_we	ebfor 4/9/2024 18:22	4/9/2024 18:22	4/15/2024 15:00			10.4.2.10			en		0	1		Yes	Somewhat impacted	Completely meets my needs
7	3	10024	/react_we	ebfor 4/9/2024 18:55	4/9/2024 18:55	4/15/2024 15:00			10.4.2.10	0		en		0	1		No	Not impacted	Completely meets my needs
7	9	10025	/react_we	ebfor 4/9/2024 19:22	4/9/2024 19:22	4/15/2024 15:00			10.4.2.10			en		0	1		No	Not impacted	Completely meets my needs
8)	10028	/react_we	ebfor 4/9/2024 21:01	4/9/2024 21:01	4/15/2024 15:00			10.4.2.10			en		0	1		No	Somewhat impacted	Somewhat meets my needs
8	1	10029	/react_we	ebfor 4/9/2024 21:35	4/9/2024 21:35	4/15/2024 15:00			10.4.2.10			en		0	1		Yes	Not impacted	Completely meets my needs
8	2	10030	/react_we	ebfor 4/9/2024 22:18	4/9/2024 22:18	4/15/2024 15:00			10.4.2.10			en		0	1		No	Not impacted	Somewhat meets my needs
8	3	10031		ebfor 4/9/2024 22:38	4/9/2024 22:38	4/15/2024 15:00			10.4.2.10			en		0	1		Yes	Somewhat impacted	Completely meets my needs
84	4	10033		ebfor 4/10/2024 4:45	4/10/2024 4:45	4/15/2024 15:00			10.4.2.10			en		0	1		No	Not impacted	Completely meets my needs
8	5	10036		ebfor 4/10/2024 13:03					10.4.2.10			en		0	1		Yes	Not impacted	Completely meets my needs
8	6	10037		ebfor 4/10/2024 13:18		4/15/2024 15:00			10.4.2.10			en		0	1		No	Not impacted	Completely meets my needs
8		10039		ebfor 4/10/2024 16:09					10.4.2.10			en		0	1		No	Somewhat impacted	Completely meets my needs
8	3	10040		ebfor 4/10/2024 16:13		4/15/2024 15:00			10.4.2.10			en		0	1		Yes	Not impacted	Completely meets my needs
8		10041		ebfor 4/10/2024 16:20					10.4.2.10			en		0	1		No	Not impacted	Somewhat meets my needs
9		10045		ebfor 4/10/2024 16:55		4/15/2024 15:00			10.4.2.10			en		0	1		No	Not impacted	Completely meets my needs
9		10046		ebfor 4/10/2024 17:58					10.4.2.10			en		0	1		No	Notimpacted	Somewhat meets my needs
93		10053		ebfor 4/11/2024 5:51	4/11/2024 5:51	4/15/2024 15:00			10.4.2.10			en		0	1		No	Not impacted	Somewhat meets my needs
93		10061		ebfor 4/11/2024 22:56	4/11/2024 22:56				10.4.2.10			en		0	1		No	Somewhat impacted	Completely meets my needs
9	-	10063		ebfor 4/12/2024 2:19	4/12/2024 2:19	4/15/2024 15:00			10.4.2.10			en		0	1		No	Not impacted	Somewhat meets my needs
9	5	10077	/react_we	ebfor 4/13/2024 16:28	4/13/2024 16:28	4/13/2024 16:28	0		10.4.2.10	0		en		0	0		No	Not impacted	Somewhat meets my needs

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