

CURB News

News from the Watchdog for Residential and Small Commercial Utility Consumers

SECOND QUARTER 2024



THE CITIZENS' UTILITY RATEPAYER BOARD OF KANSAS

CURB Files Testimony, Participates in Public Hearings for Kansas Gas Service's Rate Case KCC Docket No. 24-KGSG-610-RTS

On July 1, 2024, CURB filed direct testimony regarding the March 1, 2024, Application of Kansas Gas Service, Inc. ("KGS") for an increase of its base rates. As noted in CURB's testimony, KGS's overall requested increase is \$93.1 million, inclusive of \$35 million associated with revenue now being collected through the monthly Gas System Reliability Surcharge ("GSRS"). The GSRS, authorized by Kansas law, allows gas utilities to collect from ratepayers certain costs incurred to maintain the reliability of their gas systems. At the end of the rate case, the \$35 million will be "rebased," meaning that amount will no longer be collected through the surcharge but will be collected as part of the base rates of KGS and the GSRS surcharge will be reset to \$0. Since it is already being collected, rebasing the surcharges will not have a new revenue impact on KGS customers. Thus KGS is requesting a net increase to base rates of \$58.1 million in its rate case.

CURB filed direct testimony from five witnesses who evaluate KGS's requested rate increase and tariff changes. CURB's witnesses are Andrea Crane; Dr. J. Randall Woolridge; David Garrett; Josh Frantz; and Glenn Watkins. As discussed below, CURB's witnesses present CURB's position on the amount of increase that the Kansas Corporation Commission ("KCC") should approve, which includes such topics as KGS's rate of

return on shareholder equity, what costs and revenues should be considered in determining any rate increase, depreciation rates of KGS's assets, and how the rate increase should be spread among all KGS customers. **In sum, CURB's witnesses call for a substantial reduction to KGS's net increase of approximately \$47.3 million.**

Ms. Crane filed testimony regarding revenue requirement and adjustments. Ms. Crane also examined the proposed Annual Performance-Based Rate Adjustment ("APRA"). She addressed a number of Rate Base items and Operating Income issues underlying the KGS's requested overall increase of approx. \$93.1 million.

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Ms. Crane recommends a number of adjustments to rate base items and operating expenses such as gas storage inventory balances, Construction Work in Progress, accumulated depreciation, incentive compensation for certain executive employees, and lobbying activity. CURB took issue with KGS's request to reward executive employees with bonuses based on financial performance metrics in the face of the Commission's current policy to limit such expenses in rates. KGS's incentive compensation mechanism measures total shareholder returns relative to a group of peer utility companies to determine awards. Ms. Crane explained that using corporate financial performance as the predominant metric to incentivize workers benefits shareholders rather than ratepayers. Ms. Crane highlights the fact that regulators, not shareholders or company management, are the ones to determine what a reasonable rate of return for shareholders should be in a regulated environment. As peer utility groups raise the level of incentive compensation, KGS's methodology would increase payments in order to stay within the average of these groups. The result is that customer-focused activities could become secondary to the goal of increasing profits for shareholders.

In regard to KGS's request for the APRA, Ms. Crane recommends that the Commission reject the proposal and maintain the current accounting trackers for various items. KGS seeks to approve a ratemaking mechanism that would adjust rates on a more frequent basis in order to recover costs on a timelier basis compared to traditional rate cases. Ms. Crane noted that traditional ratemaking through base rate cases provides ratepayers several layers of protection from changes in between rate cases, where shareholders are able to earn an authorized rate of return to offset the risk of under-collections when revenues are down. The APRA would upset this balance by guaranteeing shareholders a revenue increase if earnings are lower from year to year. Ms. Crane explained that this is a fundamental change to ratemaking in Kansas and that it is not warranted at this time. Ms. Crane is critical of KGS's use of customer service-related metrics in order to determine the level of revenue sharing in the event of excess earnings above Commission-approved rates. Customers already pay for and should expect a high level of quality customer service. It would not be appropriate to tie financial awards to basic customer service expectations.

Dr. Woolridge submitted testimony on KGS's capital structure and the appropriate rate of Return on Equity ("ROE"). KGS has proposed that it be allowed to earn a return on its investments at a rate of 10.25% based on a study of other utilities and approved rates. KGS also recommended a capital structure with a higher level of equity at 59.58% compared to debt financing. This would produce an overall Rate of Return ("ROR") of 7.84%. Dr. Woolridge provided an in-depth analysis of capital markets and trends associated with determining an overall cost of equity capital. He studied a larger group of utilities and concluded that a fair ROE is 9.25% with a 52.45% equity ratio, producing a ROR of 6.94%. Dr. Woolridge explained that his review of peer utilities and falling interest rates provides a more realistic view of market conditions to determine just and reasonable rates.

Mr. Garrett provided testimony regarding depreciation. KGS has proposed a significant increase of \$13.7 million in its annual depreciation accrual, which represents a 19% raise. Mr. Garrett concluded that KGS's depreciation rates used for its accounts are unreasonably high, which results in unreasonably high depreciation expenses claimed by KGS. The issue with overestimating depreciation rates is that the utility may

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replace assets prior to the end of the economic useful life in order to increase rate base. In order to adequately balance the remaining useful life of assets while ensuring that KGS fully recovers its investments, Mr. Garrett recommends a decrease to annual accrual rates by \$13.9 million. He reaches this conclusion by utilizing longer average life values for KGS's assets in order to appropriately measure how long KGS will be able to claim depreciation expenses within various accounts.

Mr. Frantz provided testimony on KGS's proposal to change its fees for disconnections and reconnections. KGS's request is to increase the disconnection fee from its current rate of \$5.00 to \$15.00 and to reinstate a reconnection fee at \$20 (currently at \$0.00). These levels reflect the fees that were in effect in June 2020 prior to KGS's participation in the Commission's Knock and Collect program in Docket No. 15-GIMX-344-GIV ("15-344 Docket"). This pilot program gives the utility a temporary waiver of the requirement that a utility must attempt an in-person collection effort prior to disconnecting service, while also setting the current disconnection fee at \$5.00 and no fee for reconnection. Mr. Frantz reviewed the 15-344 Docket and history of KGS's participation. He also highlighted the issues in Docket No. 24-GIMG-453-GIG ("24-453 Docket") in which gas utilities, including KGS, are requesting a permanent waiver of the Knock and Collect requirement. Notably, there is no request addressing disconnection and reconnection fees in the 24-453 Docket. Mr. Frantz discussed the impact that KGS's fee proposal would have on low-income residential ratepayers and the resulting "poverty trap" (a mechanism that makes it difficult to escape poverty, such as penalties targeting the poor) that comes from unpaid bills and additional fees. He recommends that the Commission reject the fee increases and to reserve the issue for the 24-453 Docket as parties there explore the idea of a permanent waiver. In the alternative, Mr. Frantz recommends that both fees be set at \$5.00 each in order to balance the impact on ratepayers with KGS's interest in recovering costs that may be associated with disconnections.

Mr. Watkins submitted testimony on rate design. Mr. Watkins completed his own Cost of Service Study in addition to commenting on KGS's approach to rate design. Mr. Watkins determined that the appropriate way to allocate changes to rates is based on a consideration for both the peak demand for specific customer classes during the year and during the period where the system experiences peak demand.

As part of its rate design, KGS is proposing an "A/B" rate structure for residential customers, wherein residential customers can choose from either Rate A or Rate B. Rate A has a lower fixed monthly customer charge and a higher volumetric energy charge, while Rate B has a high customer charge and a lower energy charge. Customers will initially be assigned to either Rate A or Rate B based on historical usage. Mr. Watkins recommends that the Commission reject the proposal. KGS claims it is making this proposal in this docket in order to address low-income customers who struggle to pay their utility bills. While CURB generally supports efforts to provide customers alternate choices for their rates, the KGS's proposal will only increase bills compared to the current structure. Under the A/B rate proposal, the customer charge would increase from \$18.18 to \$20.00 for low-usage customers (A rate) and \$35.00 for high-usage customers (B Rate). Volumetric charges would also change from \$2.3485/MCF to \$4.3818/MCF for A-Rate customers and \$1.9160 for B-Rate customers. However, under the KGS's proposal, all customers, regardless of which rate they fall into, will see a substantial increase to their bills and those effects will be more pronounced in the winter period. Further, if a customer chooses a rate that does not comport with their usage (e.g. high-usage customers choosing the A rate be-

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cause of the lower customer charge), then they end up paying even more each year compared to choosing the appropriate rate. In light of these issues, CURB recommends the Commission reject the A/B Rate proposal and to maintain the customer charge at the current rate of \$18.18.

The next step in this rate case is the opportunity for KGS to respond to all direct and cross-answering testimony by filing rebuttal testimony (due July 22). A settlement conference is scheduled for July 31 in order to discuss the Application.

Public Hearings and Public Comment Period

In addition to submitting testimony, CURB participated in two public hearings held in Topeka and Wichita on June 13 and 17. Attendance through live and virtual options allowed a large number of participants to hear from KGS, CURB, and KCC Staff, and provided the opportunity for participants to ask questions and to engage in discussions regarding the rate increase. Participants could also testify before the KCC Commissioners regarding the proposed rate increase. The full public hearings can be watched on the [KCC's YouTube channel](#), under "Public Hearings."

Further, the Commission is accepting public comments on the application through August 5, 2024. Comments can be submitted via physical mail, over the phone, or online at the KCC's website under "Your Opinion Matters" (kcc.ks.gov/your-opinion-matters). More information about the public comment period process can be found at that link.

CURB Opposes Southern Pioneer's Request for Residential kW Demand Charges KCC Docket No. 24-SPEE-415-TAR

Southern Pioneer Electric Company ("Southern Pioneer") filed an Application to make "revenue neutral" changes to its rate design. Southern Pioneer considers its proposal to be revenue neutral because, while the rate structure is changed, total revenues are not projected to change. In other words, while the rates paid by each customer may change, the aggregate amount of revenues collected by Southern Pioneer from all of its customers are not projected to increase or decrease. Indeed, how individual ratepayers are impacted by the proposed rate design may vary considerably even if the changes are considered "revenue neutral."

Southern Pioneer's proposal contains the following provisions to which CURB is opposed:

- Require a Demand Charge of \$3.00 per kW for Single-Phase Service (i.e., residential and some small commercial), with a corresponding reduction to Energy Charge. The kW demand will derive from the customer's average kW load during the 15-minute period of maximum use during the month.
- Increase the Customer Charge for Single-Phase Service to \$16.67 per consumer per month, from \$14.67.

CURB is opposed to introducing a mandatory demand charge on principle, for several reasons. First, CURB is not aware of any investor-owned public utility in the U.S. that has successfully implemented a mandato-

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ry demand charge for residential customers. Second, demand charges are difficult for typical residential customers to understand and require additional effort to monitor and control. Third, CURB views Southern Pioneer's request as an end-around attempt to circumvent statute that prohibits rate structures that are discriminatory toward customers with self-generation (e.g., rooftop solar). Such customers comprise a miniscule portion of Southern Pioneer's total residential customer class.

CURB is also opposed to Southern Pioneer's request to raise the fixed customer charge for Single-Phase Service by \$2.00. A fundamental goal of regulatory policy is that regulation should serve as a surrogate for competition to the greatest extent possible, and consumers in the competitive market tend to prefer volumetric pricing. From CURB's perspective, raising the fixed charge goes against the economic principles of efficient pricing. Furthermore, as an advocate for residential consumers, CURB disagrees with Southern Pioneer in regard to how certain categories of costs are assigned between fixed costs and variable costs. By CURB's analysis, the fixed customer charge should actually be lower than it is now, however, in the interest of compromise, CURB is recommending maintaining the current customer charge at \$14.67.

On June 4, 2024, CURB's witness Glenn Watkins participated in an evidentiary hearing. Mr. Watkins testified in opposition to the two provisions of Southern Pioneer's proposal, as described above. Then, on June 26, 2024, CURB filed its Post-Hearing Brief restating its reasons for opposition of those provisions.

The parties are now awaiting a Commission Order, which is due by July 30, 2024.

Evergy Files 2024 Kansas Triennial Integrated Resource Plan Report KCC Docket No. 24-EKCE-387-CPL

On May 17, 2024, Evergy filed its 2024 Kansas Triennial Integrated Resource Plan (IRP) report with the Commission. The purpose of the IRP filing is to present Evergy's resource modeling used to determine energy acquisition plans to meet forecasted customer demand. This process is designed to be a holistic examination of Evergy's preferred portfolio of energy resources and the various factors that impact acquisition strategy, such as fuel prices and regulatory activity.

In its preferred portfolio of resources, Evergy maintains a commitment to a long-term strategy to reduce CO₂ emissions and transition from coal generation to other sources, such as renewables. Evergy seeks to achieve this transition through a combination of plant retirements and development of renewable generation, demand-side management programs, and new dispatchable resources. Due to increasing capacity requirements at the Southwest Power Pool and significant economic development (e.g., the De Soto Panasonic battery plant), Evergy anticipates large short-term decisions to build new generation in order to meet new demand.

This docket is not used as a way to pre-approve Evergy's plans to add new resources and add their costs to rates. Rather, it is an opportunity to provide transparency into Evergy's forecasting and resource planning that allows for stakeholder feedback.

At this stage, CURB is reviewing the report and plans to file comments on behalf of residential and small commercial ratepayers as appropriate. Stakeholders, such as CURB, may provide analytical comments on the triennial IRP within 150 days of the filing. Thus, CURB will file its comments on or before October 14, 2024.

KCC Approves Evergy Special Contract with Occidental Chemical

KCC Docket No. 24-EKSE-249-CON

On September 12, 2023, Evergy and Occidental Chemical Corporation (“Oxy”) filed a joint application requesting approval of a five-year Energy Supply Agreement (“ESA,” also commonly called a “special contract”). Evergy and Oxy currently have a contract that is set to expire June 30, 2024. The specific terms of the proposed ESA are confidential, but, generally, the contract provides discounted rates to Oxy in exchange for certain commitments. CURB filed comments in this docket, generally expressing concern that large industrial customers are given discounted rates, leaving a revenue deficiency which is shouldered by residential customers, adding to the energy burden suffered by low-income ratepayers.

On June 4, 2024, the Commission approved the request to renew the contract. Based upon KCC Staff’s recommendation, the Commission found the contract: a) to be necessary in order for Evergy to retain Oxy as a customer; .b) provides significant operational benefits to Evergy, including the ability to call on Oxy to curtail load during times of system stress; and c) results in just and reasonable rates because it is priced to exceed variable cost and contribute meaningfully to fixed costs that would otherwise be paid by other customers if Oxy were to leave the system.

Evergy Proposes Special Contract with CVR Refining

KCC Docket No. 24-EKSE-689-CON

On May 1, 2024, Evergy and CVR Refining (“CVR”) filed a joint application requesting approval of a five-year special contract. CVR’s Coffeyville Refinery and Fertilizer Plant is located in the City of Coffeyville, Montgomery County, Kansas.

CVR claims its location in Evergy’s territory is currently at a price disadvantage when compared to CVR’s other locations and when compared to its competitors in Kansas. The specific terms of the proposed contract are confidential, but, generally, the contract provides discounted rates to CVR in exchange for certain commitments. The contract addresses the risk that CVR would otherwise relocate significant portions of its operations to areas outside of Evergy’s service territory or reduce its load.

At this stage, CURB is reviewing the proposal. A Commission Order is due by December 27, 2024.

Southern Pioneer Files Annual Formula-Based Rate Update

KCC Docket No. 24-SPEE-688-RTS

On May 1, 2024, Southern Pioneer filed an Application for adjustments to its Formula-Based Rates (“FBR”).

From a regulatory perspective, Southern Pioneer is a unique utility. It is a not-for-profit utility regulated by the KCC. Yet, it is a subsidiary of Pioneer Electric Cooperative, Inc. (“Pioneer”), which is not subject to KCC regulation for ratemaking purposes. Therefore, Southern Pioneer does not file typical rate cases before the KCC like other regulated public utilities in Kansas.

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The Commission has approved a debt service coverage (“DSC”) ratio of 1.60 to provide funding for Southern Pioneer. The DSC ratio is a financial ratio used to assess the ability of a firm to pay its debt obligations. Southern Pioneer files an annual FBR review, wherein the Commission-approved billing protocols require Southern Pioneer to increase its rates when the DSC ratio falls below 1.60 or decrease its rates when the DSC ratio is above 1.60.

The proposed 2024 total increase to rates is \$1,000,127 or a 1.40% increase compared to 2023 rates. Southern Pioneer cites to operational and maintenance cost increases as the primary driver for the requested increase.

KCC Staff filed its Direct Testimony on July 12, 2024. Parties, including CURB, have until July 19, 2024, to respond to Staff’s filing. A final order from the Commission is due by August 29, 2024.

Settlement Agreement on Southern Pioneer’s Renewable Energy Program KCC Docket No. 24-SPEE-540-TAR

On January 31, 2024, Southern Pioneer filed an Application requesting to implement a Renewable Energy (“RE”) Program Rider tariff. Southern Pioneer receives its power supply from Sunflower Electric Power Corp. (“Sunflower”), which developed the RE Program. Participation in the RE Program would be voluntary and the RE Program is designed so that no associated costs should be collected from non-participants. Broadly, the proposed RE Program offers multiple sub-programs across two tiers (residential and commercial) and two divisions (wind and solar).

For residential customers, the only RE Program offering is the Tier 1 Residential Community Solar Program. Participating residential customers would subscribe to pay for “shares,” which represent renewable energy produced by the [Johnson Corner Solar Project](#), located in Stanton County, Kansas. There is no term commitment required for participation; participants can cancel at any time. Subscriptions would be sold on a first-come, first-served basis at a monthly cost of \$5 per 125 kWh share (\$0.04 per kWh), until the allocated shares are fully subscribed. Participants may subscribe for a number of shares up to the equivalent of their 12-month average energy usage (for the average residential customer this would be around 1,000 kWh, or up to 8 shares). For billing purposes, the customer will be charged the subscription price and receive an offsetting adjustment equal to the market value of the solar resource’s energy.

Parties to the docket, including CURB, have signed a Settlement Agreement. Under the Agreement, filed June 25, 2024, the signatories recommend approval of the RE Program with a few additional provisions. Southern Pioneer must note in the customer education materials that participation in the Community Solar Program will not add any additional renewable resources to Sunflower’s portfolio, rather, participants are allocated shares of an existing solar resource. There are also a couple provisions of the Agreement that add more protections against cost overflow from the Tier 3 program which procures new renewable resources for high-volume commercial and industrial customers. The Commission will issue its Order regarding the Settlement Agreement by September 24, 2024.

Sierra Club/Vote Solar Appeal of KCC Order on Evergy Wholesale Demand Response Tariff

Johnson County District Court Case 24-CV-00086 and KCC Docket No. 23-EKCE-588-TAR

On January 5, 2024, Sierra Club/Vote Solar filed a Petition in Johnson County District Court for judicial review of the KCC's decision in Docket. No. 23-EKCE-588-TAR. In that KCC Docket, the Commission approved a non-unanimous settlement agreement, which was opposed by Sierra Club/Vote Solar, regarding changes to Evergy's tariffs covering local coordination between Demand Response Aggregators ("DRAs") and Evergy stemming from wholesale Demand Response ("DR") participation in the Southwest Power Pool ("SPP") integrated marketplace. DR is defined as a reduction in the consumption of electric energy by customers from their expected consumption in response to an increase in the price of electric energy or to incentive payments designed to induce lower consumption of electric energy. DRAs are entities that aggregate the load of one or more retail customers for purposes of participation as DR in a wholesale market. SPP is the regional transmission organization wherein Evergy bids in and purchases energy.

Under the settlement agreement, Evergy's retail customers seeking to participate in the SPP wholesale DR market first must provide a registration and consent form to Evergy and, additionally, participating DRAs must have an effective agreement with Evergy.

CURB was a party to the KCC docket. In CURB's view, DR participation in the SPP integrated marketplace can help to reduce energy costs for ratepayers, but unfettered participation can adversely affect reliability and actually increase ratepayer costs. Sierra Club/Vote Solar contended the KCC's decision imposed unlawful impediments to competitive federal markets for clean energy, which they contend exceeds the KCC's statutory authority and oversteps into exclusive federal jurisdiction.

These parties generally echoed these arguments upon appeal. CURB has intervened in the Johnson County District Court case as an appellee on the side of the KCC. On June 3, 2024, CURB filed its brief with the Johnson County District Court. In its brief, CURB outlined its position that Evergy's proposal is reasonable because, absent the proposal, a lack of coordination and information-sharing regarding DR Resources in KCC's retail jurisdictional space could adversely affect the safety and reliability of utilities' distribution systems. CURB argued that the KCC has broad state authority to take action to ensure that the retail distribution system of electric utilities remain safe and reliable. Further, federal law does not preempt State actions that are aimed at retail electric regulation, particularly actions aimed at a local utility's retail distribution system.

Parties are currently awaiting an Order from the Court for further direction.

Settlement Agreement on KGS and Black Hills' Acquisition of Southern Star Assets

KCC Docket Nos. 24-KGSG-237-CON and 24-BHCG-652-ACQ

Southern Star Central Gas Pipeline ("Southern Star") has been engaged in efforts to eliminate ownership and operation of Domestic Meters (predominately farm tap and irrigation service) on its system. Southern Star has received FERC regulatory approval to "abandon by sale" Domestic Meter assets (facilities and customer accounts) located throughout Kansas.

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KGS and Black Hills are each requesting to separately acquire Domestic Meter assets from Southern Star, along with the associated certification to provide service. Southern Star has entered into agreements to sell 1,042 Domestic Meter assets to KGS and 273 Domestic Meter assets to Black Hills.

CURB is reviewing Black Hills' proposal. A formal procedural schedule has not yet been established for Black Hills' request.

A Settlement Agreement has been reached in the KGS docket. Under the Agreement, the purchase price charged to KGS has been significantly reduced. If the acquisition is approved, KGS will need to replace bare steel yard/service lines for the acquired customers. As a condition of the Agreement, if KGS exceeds \$4 million in replacement costs, KGS ratepayers will only be responsible for half of any excess amount. A KCC Order on KGS's request is due July 18, 2024.

KCC Approves KGS Acquisition of American Energies Assets

KCC Docket No. 24-KGSG-284-ACQ

KGS and American Energies Gas Service ("American Energies") submitted an Application requesting authorization for KGS to acquire certification and certain assets from American Energies.

On May 9, 2024, the Commission approved the proposal with a few minor modifications, as agreed upon by the parties in settlement. As a result, American Energies will no longer provide public utility services in Kansas. The former American Energies customers will take service under KGS's existing rates, the same as any new KGS customer, with one exception being that the acquired customers are subject to the Winter Storm Uri cost recovery charge carried over from American Energies instead of the charge that is applicable to other KGS customers.

Gas Utilities Request Permanent Waiver of "Knock and Collect" Requirements

KCC Docket No. 24-GIMG-453-GIG

As part of the disconnection process, the KCC's Billing Standards require public utility technicians to attempt to make personal contact with the customer on-premises and accept payment in order to avert disconnection, a protocol commonly referred to as "Knock and Collect." However, most public utilities have been granted either a permanent or temporary waiver from this requirement by KCC, meaning personal contact is not required ahead of disconnection. Instead, utilities who are allowed to disregard the Knock and Collect requirement of the KCC's Billing Standards, must provide regardless, it is still required that customers receive multiple notifications to affected customers of delinquent payment via mail, phone, and/or digital starting 10 days prior to disconnection.

Atmos Energy Corporation and Kansas Gas Service have both been granted temporary (i.e., trial-basis) waivers from the Knock and Collect requirements through a Pilot Waiver. They are now seeking to make these

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waivers permanent. Black Hills Gas Company has intervened in this docket, and it is CURB's understanding that Black Hills plans to adopt whatever decision comes from the Commission regarding KGS's and Atmos's request.

CURB is currently reviewing the gas utilities' proposal and developing a response to the request. A formal procedural schedule has not yet been established.

Although the gas utilities are not requesting to adjust their disconnection and reconnection fees in this docket, in KGS's rate case docket, KGS is requesting to increase its disconnection fees (from \$5 to \$15) and reconnection fees (from \$0 to \$20) in connection with its exit from the Waiver Pilot. CURB's filed position in KGS's rate case is that the disconnection and reconnection fees should be reviewed as part of the gas utilities' request in this docket instead. CURB recommends the fees not be increased, because increasing these fees only worsens the "cycle of poverty" that low-income customers face, wherein penalties targeted at the poor compound, making it difficult for them and their descendants to escape impoverishment.

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We're on the Web!

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ABOUT THE CITIZENS' UTILITY RATEPAYER BOARD

Established in 1988, the Citizens' Utility Ratepayer Board (CURB) is an agency focused on advocacy for residential and small commercial utility consumers in Kansas. The Board is composed of five (5) appointed volunteer members representing the four congressional districts in Kansas and one at-large member. CURB was initially founded by the Chairman of the Kansas Corporation Commission upon a perceived need for a stronger consumer advocate. CURB has evolved into an independent agency, currently employing a consumer counsel, two supporting attorneys, three analysts, and two administrative staff.

OUR MISSION: To zealously protect the interests of residential and small commercial utility ratepayers before the Kansas Corporation Commission and the Kansas legislature.

OUR VISION: To protect Kansas residential and small commercial utility ratepayers by promoting the delivery of optimal utility services—being safe, reliable and technically robust, environmentally sensible, cost-effective, and equitably provided to all Kansas utility consumers at just prices.

Struggling to pay your utility bills?



For financial assistance, visit:

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(Search for your city to find local helping organizations.)

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