

# CURB News

News from the Watchdog for Residential and Small Commercial Utility Consumers

December 2020



THE CITIZENS' UTILITY RATEPAYER BOARD OF KANSAS

## Evergy's Sustainability Transformation Plan (Docket No. 21-EKME-088-GIE)

Docket No. 21-EKME-088-GIE involves an investigation into the Sustainability Transformation Plan (STP) filed with the Kansas Corporation Commission (Commission) by Evergy Metro, Inc., Evergy Kansas Central, Inc., and Evergy South, Inc. (collectively Evergy). The STP was the result of the work of a Strategic Review and Operations Committee (SROC) established by Evergy to explore ways to increase shareholder value in the utility. According to Evergy, the STP will create high-certainty, line-of-sight equity value of up to \$5 billion, while providing tangible value to all of Evergy's key stakeholders.

Significantly, the STP sprang from certain demands made upon Evergy by Elliott Associates, L.P. (Elliott). Elliott is an asset management firm that manages approximately \$40.2 billion in assets. Elliott owns an economic interest equivalent to 11.3 million shares of Evergy stock worth approximately \$760 million.

In these regards, Elliott had issued a press release on January 21, 2020, summarizing the contents of an open letter it had sent to the Evergy Board of Directors (Evergy Board) in which Elliott outlined various steps to increase its shareholder value. Subsequent to the open letter, Evergy entered into an agreement with Elliott on February 28, 2020, and the SROC was then established to explore ways to increase shareholder value. The SROC considered two plans:

1. **Modified Standalone Plan:** (high-performance plan with enhanced oversight) that would cut operating and maintenance expenses and dramatically increase capital expenditures. The goal of this plan is annual rate-base growth of up to 10% with no expected overall rate impact on customer bills.
2. **Merger Transaction:** A strategic alliance with another entity, where Evergy's current shareholders would receive stock in the combined entity.

Pursuant to the February 28, 2020, agreement, the SROC presented its recommendation to the Evergy Board to implement a Modified Standalone Plan

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### MAJOR CASES WE ARE CURRENTLY FOLLOWING:

- **COVID-19 DOCKETS**
- **18-WSEE-328-RTS** —  
EVERGY CENTRAL'S DG RATE DESIGN
- **21-EKME-088-GIE** —  
EVERGY'S SUSTAINABILITY TRANSFORMATION PLAN
- **15-GIMX-344-GIV** —  
KNOCK & COLLECT INVESTIGATION

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(which Evergy designated as the STP) and the Board unanimously approved it. Because of the potential ramifications of the STP upon ratepayers, the Commission determined that it should be the subject of an investigation. This investigation is continuing to date in Docket No. 21-EKME-088-GIE.

Interestingly, Docket No. 21-EKME-088-GIE was not the first docket in which the Commission and stakeholders considered the STP. The STP was first considered in Docket No. 20-EKME-514-GIE. In that docket, the Commission Staff (Staff) petitioned the Commission on June 11, 2020, for an order initiating a general investigation into the February 28, 2020, agreement between Elliott and Evergy. In 20-EKME-514-GIE, Staff identified a number of issues of concern arising out of the agreement, regarding both the Modified Standalone Plan and the Merger, if and as selected by Evergy. Staff's petition recommended that the Commission require the Company to provide the rationale and explanation of a number of questions outlined by Staff pertaining to these options. On June 18, 2020, the Commission issued an Order Opening General Investigation in Docket No. 20-EKME-514-GIE. In that Order, the Commission directed the Company to provide a report to the Commission on the SROC Report submitted to the Evergy Board and to provide explanations of various issues pertaining to either the Modified Standalone Plan or the Merger Transaction, whichever was selected by the Board. The Commission intended the general investigation in Docket No. 20-EKME-514-GIE to inform the Commission, the Company's customers and other stakeholders about Evergy's analysis and rationale behind its decision to pursue either a Modified Standalone Plan or a Merger Transaction. The Commission's June 18, 2020, Order granted Staff, CURB, and any other intervenors an opportunity to file responsive comments no later than 45 days after the Company submitted its report.

CURB petitioned to intervene in Docket No. 20-EKME-514-GIE and the Commission granted intervention to CURB on July 30, 2020. On July 30, 2020, CURB filed responsive comments. In its comments, CURB noted that the process resulting in the STP was initiated by Elliot on the basis that shareholders were not achieving sufficiently high returns from their investment in Evergy. Consequently, CURB stated that its primary concern is to ensure that the STP does not result in higher ratepayer cost or utility service deterioration in order to increase shareholder earnings. In addition, CURB suggested that the Commission require Evergy to support all capital investments made under the STP as being reasonable and necessary to serve its customers. Several other parties made comments in Docket No. 20-EKME-514-GIE, but the Commission did not take any action. That docket is currently closed.

However, in the midst of Docket No. 20-EKME-514-GIE, Staff petitioned the Commission to open another investigation, particularly concerning the STP. On November 19, 2020, in Docket No. 21-GIME-088-GIE, the Commission Ordered the following three workshops in which all stakeholders could participate:

- December 3, 2020 – Workshop with Evergy Presentation on grid modernization investments and following related benefits with intervenor and Commissioner questions;
- December 21, 2020 – Workshop and presentations on operational efficiencies included in the STP (NFOM and Fuel Purchase Power costs) with intervenor and Commissioner questions;
- January 20, 2021 – Workshop and presentations on enhanced customer experience with intervenor and Commissioner questions.

The Commission also ordered that the parties could file comments on these matters with Evergy filing

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responsive comments later in 2021.

The Commission granted intervention to CURB in Docket No. 21-EKME-088-GIE on August 27, 2020. CURB intends to attend and fully participate in all workshops and to file comments as allowed. CURB participated in the December 3 and December 21 workshops and plans to participate in the January 20 workshop, as well. Throughout this docket, CURB is always concerned that rates must be reasonable, and utility service sufficient. CURB is also concerned that capital investments that Evergy makes must benefit the ratepayer, essentially being required for ratepayer purposes and used for those purposes. The documents that have been filed in these dockets are available on the Commission's website. As this docket progresses, it will continue to be covered by CURB's newsletter.

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## **Evergy's Proposed DG Rate Design Options**

**(Docket No. 18-WSEE-328-RTS)**

On October 13, 2020, Evergy filed testimony with the KCC containing its proposal to modify its rate design pertaining to distributed generation (DG) customers. Along the lines of its initial comments, Evergy proposed to implement a Grid Access Fee (GAF) for all residential customers. The new fee is calculated at \$3 per kW of DG capacity per household. For residential customers who do not use a DG system, this charge would effectively be \$0 on those bills. DG customers would see a new charge based on how many kW of electricity production their system has. Evergy also noted that the \$3 per kW calculation only represents half of the fixed costs that Evergy says it incurs serving DG customers. For Evergy, full fixed cost recovery would require a GAF set at \$6.50 per kW of installed DG capacity per customer.

As an alternative to the GAF, Evergy proposed to implement a minimum bill structure to recover fixed costs from DG customers and to comply with the Kansas Supreme Court's mandate which found the current demand charge for DG customers to be discriminatory. Under this proposal, Evergy would charge every residential customer a minimum bill of \$35 per month. This bill would retain the two-part rate structure of a fixed customer charge and volumetric energy charges. The \$35 minimum bill would be inclusive of the current \$14.50 customer charge. Customers who use enough energy to receive bills larger than \$35 per month will be unaffected by this change. However, bills that are less than \$35 due to lower energy consumption, for DG and non-DG customers alike, will see in an increase in their electricity bills. Like with the GAF, Evergy's minimum bill proposal reflects about half of what Evergy says is required to fully recover fixed costs. Evergy has stated that an "ideal" minimum bill would be \$77 per residential customer.

On November 5, 2020, the Commission hosted a virtual public hearing where people were allowed to share personal comments and opinions on Evergy's proposal. CURB representatives were present for the hearing and watched online. Many speakers voiced their disapproval with the proposals.

On November 13, 2020, parties filed testimony in response to Evergy's proposals. CURB reiterated its original proposal to put all residential customers into a single rate class and to allow Evergy to track any shortcomings on fixed cost recovery at a rate of \$3 per kW capacity used by DG customers. CURB believes that its

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proposal best addresses the issue of fixed cost recovery while minimizing the disruptions for all residential customers due to a change in rate design. CURB argues that the Company's minimum bill proposal would inevitably raise the bills of some non-DG customers who use less energy than the system average. Stated another way, customers who do not consume enough electricity to get their bills to cover the minimum bill amount will see an increase in their bills with no corresponding increase in service. Meanwhile, the GAF presents a number of legal risks that could end up in lengthy litigation again. Should the Courts strike down this proposed rate design, the case would wind back up with the KCC on remand.

An evidentiary hearing was held on December 16 and 17 via electronic meeting. Parties are expected to file post-hearing briefs by January 11, 2021. A KCC order is due by February 25, 2021.

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## **Investigation of “Knock and Collect” Requirement (Docket No. 15-GIMX-344-GIV)**

On February 26, 2015, the Kansas Corporation Commission (KCC) opened a general investigation regarding the appropriateness and effects of eliminating the "Knock and Collect" requirement of the Commission's electric and natural gas billing standards prior to disconnection of utility service. The Knock and Collect billing standard required a Kansas utility to attempt to collect any past due amount at the customer's door before disconnecting utility service.

CURB filed a Petition to Intervene in this docket on February 27, 2015. The KCC granted CURB's petition on March 10, 2015. CURB filed recommendations regarding the investigation procedures on April 13, 2015, as did several other parties.

On November 4, 2016, KCC Staff recommended granting the participating utilities (Westar now Evergy and Southern Pioneer Electric) a temporary waiver of the billing standards for a three-year pilot program to gather information concerning the appropriateness and effects of eliminating the Knock and Collect procedure before utility service disconnection. Staff's proposal contained certain reporting requirements, customer notice requirements and limited the temporary waiver to periods not covered by the Cold Weather Rule (CWR). The Pilot Program included bi-annual reporting requirements, customer education requirements, and subject to midpoint and final reviews.

On June 4, 2020, the Commission approved the following revised Knock and Collect schedule:

- October 15, 2020 – Bi-annual reports by Evergy and Southern Pioneer due;
- December 15, 2020 – Final recommendations regarding whether the applicable Billing Standards should be permanently modified or whether a permanent waiver should be approved;
- January 15, 2021 – Responses to Final Recommendations by other Parties due;
- February 26, 2021 – Commission Order due regarding whether the applicable Billing Standards should be permanently modified or whether a permanent waiver should be granted.

On December 15, 2020, both Evergy and Southern Pioneer filed their Final Recommendation on the Knock and Collect Pilot Program requesting the Commission approve the Knock and Collect. This process would allow their customers to utilize the capabilities and increased functionality of Advanced Metering Infrastructure

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(AMI) by using the remote disconnect and reconnect features. The utilities note the remote disconnect and reconnect features of the AMI meters save customers money through a reduction in operating costs and on an individual customer basis through lower disconnect and reconnect fees.

On December 15, 2020, KCC Staff filed its Report and Recommendation recommending the Commission grant Evergy Kansas Central and Southern Pioneer a permanent waiver to the Billing Standards for customers served with AMI meters that are remote disconnection capable. The waiver would also extend to other utilities that are capable of remote disconnection via AMI.

On December 15, 2020, CURB filed its Report and Recommendation (R&R) comments. In this report, CURB believes the Commission should grant the participating utilities a permanent waiver of the Knock and Collect billing standard for the following reasons:

- Its most important role is to advocate for low-income utility ratepayers. By advocating for reliable energy at the least reasonable cost, CURB helps to maintain the affordability of energy for low-income Kansans. Affordable energy helps the low-income ratepayers to keep the lights on. In short, CURB should do all it reasonably can to ensure that low-income ratepayers are able to pay their utility bills.
- The pilot program offers several important benefits to the ratepayers who struggle to pay their utility bills. Participating utilities reduced the disconnection charge from \$15 to \$5 per transaction and discontinued the reconnection fee due to the reduced costs associated with AMI meters. Customers save \$30 per disconnection/reconnection. When a customer is already struggling to pay their utility bills, adding \$30 to a delinquent bill is not helpful.
- The cost of continuing the “knock and collect” requirement of the Commission’s Billing Standards significantly outweighs its benefits. Utilities in surrounding states are not required to contact their delinquent customers personally before disconnection of those customers’ utility service.
- The “knock and collect” requirement of the Commission’s Billing Standards does not materially affect the energy burden suffered by those ratepayers who cannot pay their utility bills on time. CURB feels the participants should use a portion of program savings to help address the energy burden.

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## **Liberty-Empire’s Revisions to Credit Card Fees for Bill Payment**

**(Docket Nos. 20-EPDE-459-TAR and 21-EPDE-134-TAR)**

Dockets 20-EPDE-459-TAR (“20-459”) and 21-EPDE-134-TAR (“21-134”) both concern the fees charged to customers by electric utility Liberty-Empire for bill payment via credit card.

On May 20, 2020, Liberty-Empire filed the 20-459 Application, requesting approval to update its tariff fee for credit card transactions. According to the Company, the fee is collected by a third-party vendor and not Liberty-Empire itself. The tariff fees were last updated in 2006. Liberty-Empire changed vendors in 2013, which resulted in changes to the fee structure, but the tariff was not updated to reflect the transaction charges in effect. The transaction fee for all customers paying by credit card, prior to 2013, was \$3.95. In 2013, the fee decreased to \$2.25 per transaction for residential customers and increased to \$13.00 (with a \$10,000 transaction limit) for commercial customers. However, the current tariff fee is still \$3.95 for all customers.

The Company realized the tariff fee did not match the fees being charged to customers when prepar-

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ing its filing for Docket 20-EPDE-448-MIS (“20-448”), which included a request to reimburse customers for credit card transaction fees as part of the Company’s relief plan in response to the COVID-19 pandemic.

On October 1, 2020, prior to resolution of the 20-459 and 20-448 Applications, Liberty-Empire filed the 21-134 Application notifying the Commission it was changing third-party vendors and requesting approval to revise its tariffs regarding credit card transaction fees. The 21-134 request represents a decrease from the 20-459 fee structure but includes more strict transaction limits: the fee for residential customers would be \$1.75 with a transaction limit of \$600 and the fee for commercial customers would be \$7.95 with a \$1,200 transaction limit. Furthermore, the 21-134 Application updates the tariff to clarify that debit cards, prepaid cards, and ACH are also subject to the fee, which is already true in practice. As part of the 21-134 Application, Liberty-Empire restated its intentions to waive credit card fees through the end of 2020, referring to its request in 20-448, and noted it would defer the waived fees for potential recovery in its next rate case according to the Order in Docket 20-EPDE-427-ACT.

On October 6, 2020, the Commission issued the 20-448 Order, allowing Empire to reimburse customers for credit card transaction fees through the end of 2020.

On October 20, 2020, Commission Staff (“Staff”) filed its Report and Recommendation (“Report”), recommending approval of the 20-459 fee structure. Because the fees charged to residential customers since 2013 were lower than the tariff rate (\$2.25 compared to \$3.95) Staff found no harm was done to residential customers. However, because the fee charged to commercial customers was higher than the tariff rate (\$13.00 compared to \$3.95) Staff recommended those customers be refunded the difference. Staff did not recommend additional penalty be assessed for tariff non-compliance.

On October 30, 2020, CURB filed its response to Staff’s Report. CURB expressed its frustration regarding the complications caused by the concurrent 21-134 Application which requests a different fee structure than what is proposed in 20-459. CURB agrees with Staff’s analysis of the 20-459 proposal, but because the proposed 21-134 fees are lower than the 20-459 fees, CURB proposed tariff language that would allow the company to charge “up to” the amounts requested in 20-459.

On November 18, 2020, in 20-459, the parties submitted a Unanimous Settlement Agreement (“Agreement”). Under the Agreement, Liberty-Empire would continue to waive or reimburse credit card transaction fees and defer potential recovery of those fees until an Order is issued in Docket 21-134. For each transaction, the Company would record the lesser amount of the two fee structures. Staff and CURB explicitly retain the right to challenge whether the Commission should approve any request by Liberty-Empire to recover any waived or credited third party vendor fees.

The majority of CURB’s concerns regarding 20-459 have been resolved in the proposed Settlement Agreement, pending Commission approval. A Commission Order in 20-459 is due by January 4, 2021.

CURB is still reviewing the proposed fee structure in 21-134. The proposed fees represent a reduction below current fees for both residential and commercial customers, but the transaction limits are stricter. CURB is awaiting Staff’s 21-134 Report and Recommendation and anticipates filing a response. A Commission Order in 21-134 is due by May 31, 2021.

## **CURB attends Semi-Annual NASUCA Conference**

Members of CURB attended the semi-annual conference of the National Association of State Utility Consumer Advocates (NASUCA), held virtually from November 9–12, 2020. NASUCA is an association of 55 consumer advocate offices in 43 states as well as the District of Columbia, Barbados, Puerto Rico, and Jamaica. NASUCA holds two conferences per year: one in June and one in November. These conferences help consumer advocates like CURB become familiar with utility issues other states are facing, learn best practices in representing utility consumers, and allow members to share and discuss their successes and challenges.

Typically, NASUCA conferences are held in person. However, due to the ongoing pandemic, the November 2020 conference was conducted via Zoom. The digital format of this particular conference facilitated an uptick in registration and participation but hampered the after-hours networking opportunities. CURB usually sends one or two representatives, but because the conference was held virtually, all five members of CURB's legal and technical staff were able to participate in the November 2020 conference.

Within NASUCA there are several committees focused on specific facets of the utility industry: Electricity; Natural Gas; DER (distributed energy resources); Water; Telecommunications; Accounting and Taxes; and Consumer Protection. Each committee holds meetings (typically monthly via telephone or web) to discuss policy positions. During the conference, each Committee Chair gave a brief overview of the goings-on within their Committee.

Sessions of the November 2020 NASUCA conference covered topics such as: improving regional transmission organization (RTO) governance and function; securitization; achieving affordable, ubiquitous broadband; impacts and lessons from COVID-19; natural gas distribution system safety; regulatory considerations and barriers to Distributed Energy Resource integration; rate design for customers of the future; the current state of electric transportation; and protecting utility infrastructure from external threats.

Furthermore, two resolutions were passed to: 1) encourage states to continue to evaluate and analyze energy storage adoption issues, and 2) support adoption of the National Transportation Safety Board's new safety recommendations resulting from its investigation of an explosion in a low-pressure gas distribution system in Massachusetts.

CURB will continue to attend these conferences in order to improve its ability to advocate for residential and small commercial ratepayers. The next NASUCA conference is tentatively scheduled for June 2021, in person, pending the status of the pandemic.

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## **Energy Savings Tips**

We energy consumers have survived the summer heat, but winter is upon us. With the COVID 19 pandemic, many energy consumers face the winter months financially stressed. But we must keep our homes safe and warm, particularly since many of us are working from home during the pandemic. One of CURB's constituents, mindful of the need to lower energy costs, reminded us of an article that he had read, "21 useful Tips to Save on Energy During Coronavirus." It had some good energy-savings tips.

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Yet it encouraged us to do a little research on our own. We would like to share some of the tips we found most useful, not only from the above article, but elsewhere on the internet. For those who are interested, the article, dated October 13, 2020, can be found through your preferred search engine, as can many other articles. Some articles have their own perspectives on energy. CURB does not endorse individual viewpoints on energy issues that are contained in websites, but will always encourage energy consumers to research all energy issues.

Some of these articles stressed energy efficiency measures to reduce energy use, while others stressed energy conservation. Some included both. Both energy efficiency and energy conservation can save energy costs for the consumer. These methods have differing approaches.

Energy efficiency can be described as a means of reducing energy use while enjoying the previous level of comfort, convenience and/or productivity. It is usually accomplished through the purchase of energy-savings goods. Energy conservation is often thought of as efforts made to reduce energy consumption by using less of an energy service. These are clearly related concepts. We raise this distinction because some of the measures listed below fall into one or the other. Energy conservation is often a behavior change towards energy use.

CURB has divided the list of energy savings tips into small purchases and large purchases as well as behavior changes that can save energy and dollars for the consumer.

## **Small Purchases**

- Use a smart power strip. Some claim that as many as 7,374 hours of electricity are wasted by leaving electric devices on standby. A smart power strip can lower those lost hours.
- Use energy-saving bulbs. Compact fluorescent lamps (CFLs) and light emitting diodes (LEDs) are more efficient than halogen lights. At least, switch the bulbs in the rooms where you work the most.
- Install low-flow showerheads. Installing low-flow showerheads will not only save water, but will use less hot water when you shower.
- Replace the furnace filter. A dirty furnace filter obstructs airflow, causing your furnace to run longer because there will be less warm air flowing through your house. Replacing furnace filters every two or three months may reduce energy usage.
- Check for drafts around windows and doors and repair leaks. Leaks are often thought to occur around doors and windows. Using new seals and weather stripping can help. Yet, leaks also occur around electrical outlets. Be sure to check for all leaks and repair them.
- Insulate hot water pipes. Insulating hot water pipes will help ensure that the heat from the hot water does not escape into the atmosphere.

## **Larger Purchases**

- Perform an energy audit. Hiring a certified and trained energy auditor can point out inefficiencies and wasted energy in your home.
- Add insulation to your attic. Obviously, adding insulation in your attic can help seal air leaks and improve heating and cooling. According to the EPA, attic insulation should be R-38 insulation at a minimum and be-

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tween 10 and 14 inches deep.

- Tune up your HVAC. An inefficient heating and cooling system will cost more to heat or cool a home. A tune-up can ensure that connections are tight, your HVAC is properly lubricated and its coils are cleaned.
- Install a storm door or windows. Adding a storm door or windows provides an extra layer of protection from the weather. In many homes, windows are old and inefficient. Replacing those windows with newer insulated windows can lower energy costs.
- Switch to heavier curtains. When adding storm windows is not an option, one can use heavier curtains in rooms that do not receive direct sunlight. These heavier curtains can help insulate the home from cold outside.
- Install a programmable thermostat. If you are regularly away from your home, a programmable thermostat can be used to keep the house colder when you are away and then increase the heat just before you arrive. It can also lower the temperature at bedtime, reducing energy use. Of course, one can adjust settings manually, but we often forget.
- Buy energy-efficient appliances. Unfortunately, appliances break down. When that occurs, look at the Energy Star rating of new appliances to find ones that are more energy-efficient than others. A more energy-efficient appliance will save energy and money.

### Behaviors

- Try to structure your day. Working at home sometimes leads to working longer hours than when one works in an office. Structuring your day not only will help your mental energy, but can lead to turning off devices and saving energy.
- Change screen settings. Simple as it sounds, you can turn down the brightness on computer screens to save energy. Also using low-powered devices such as computer or laptop to stream shows versus using the television can result in energy savings.
- Make the most of natural light. When at home, use natural light. Most times, even when working, natural light provides enough lighting to get work and tasks done.
- Boil water in a kettle versus in a pan. The average kettle is only 80% effective and boiling water on the stovetop is only 70% effective. The energy savings are obvious. Moreover, cooking in the kitchen helps heat the kitchen, allowing the thermostat to be lowered while keeping warm.
- Use a line to dry clothes versus a dryer. Using a line to dry your clothing once it is washed will save energy. Most times, line-dried clothes will be as fresh and good looking as those dried in a drier.
- Lower thermostat. Obviously, lowering the thermostat can save energy costs. Lowering the heat in a home and using sweaters and blankets can still allow us to be comfortable, but save money. Some studies suggest that by lowering a thermostat by 10 to 15 degrees during the day when one is away will save 5% to 15% of energy costs each year.
- Unplug unused chargers. Collectively, unplugged cell phone and battery chargers can increase your energy bill by 10%. By unplugging these devices when not in use, one can save some energy dollars.
- Adjust fans to run in winter mode. Fans are not just for summer use. If you reverse the blade for winter, you can use the fan to keep the environment a little warmer in winter.
- Monitor your energy use. Check your energy usage frequently and change your habits to save energy

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and money. You will be surprised what you can do to lower your energy bill.

Thanks to the Kansas energy consumer that called CURB's attention to the need to save energy during the winter and this pandemic. CURB always appreciates hearing from energy consumers. Many times, information is shared that augments the information known by CURB in important areas. CURB hopes this article is helpful to Kansas energy consumers during the upcoming winter and throughout the remainder of this pandemic.

ABOUT THE CITIZENS' UTILITY RATEPAYER BOARD (CURB)

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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, two 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.

## The Citizens' Utility Ratepayer Board



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