

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the General Investigation Into the )  
Appropriateness of Certain Sections of the Kansas )  
Corporation Commission’s Electric and Natural ) Docket No. 15-GIMX-344-GIV  
Gas Billing Standards Related to On-Premises )  
Collections. )

**JOINT STATUS UPDATE**

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively), the Citizens’ Utility Ratepayer Board (CURB), Southern Pioneer Electric Company (Southern Pioneer), and Westar Energy, Inc. and Kansas Gas and Electric Company (Westar) (collectively “Parties”), and respectfully file this Joint Status Update. In support of the Status Update, the Parties state the following:

1. In February 2015, the Commission opened a general investigation into the Electric and Natural Gas Billing Standards (Billing Standards) to examine the appropriateness of eliminating the “knock and collect” requirement prior to disconnecting utility service.<sup>1</sup> Staff recommended the inquiry be limited only to Section IV, Item C (2); Section IV, Item G; and Section V, Item D (2) of the Billing Standards.<sup>2</sup> Specifically, the general investigation is limited to examining the protections provided by the knock and collect procedures and not remote disconnect technology in and of itself.

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<sup>1</sup> Order Adopting Staff’s Report and Recommendation and Opening General Investigation (Feb. 26, 2015).

<sup>2</sup> *Id.* at 1.

2. Ultimately, the Commission approved a pilot program waiving the Knock and Collect requirement for Southern Pioneer and Westar.<sup>3</sup> The pilot program contains a “Midpoint Review” for parties and the Commission to evaluate the performance of the pilot program.<sup>4</sup>

3. On January 16, 2019, Staff, CURB, Westar and Southern Pioneer filed recommendations regarding whether to continue the pilot program as part of the Midpoint Review. All of the parties agreed that the pilot program should be continued; however, Staff also recommended that a benefit-cost analysis be required as part of the final review.

4. Westar and Southern Pioneer disagreed with many of Staff’s recommendations and intended to file responses. After discussions with Staff, however, the Parties agreed that they would file a Joint Motion to extend the procedural schedule to allow for time to attempt to resolve the disagreements through further discussions.

5. After filing several requests for extensions of the schedule, the Parties filed a Joint Motion to Partially Suspend the Procedural Schedule on March 21, 2019. In that filing, the Parties explained that they had reached an agreement in principle regarding how to proceed but that many of the details of the agreement still needed to be finalized. They explained that if the Parties’ agreement is ultimately finalized, it would result in a joint filing with the Commission by the Parties that includes a proposal for changes to the pilot program and an extension to the pilot program (to run one and a half years after the Commission’s order on the joint filing), which will allow sufficient time to capture data relating to the proposed changes for reporting purposes. The Parties indicated that they would propose new dates for the remaining bi-annual reports and final recommendation at the time they make the joint filing. In that Motion, the Parties committed to either make the Joint Filing or file

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<sup>3</sup> Order Approving Pilot Program (Aug. 17, 2017).

<sup>4</sup> *See id.* pp. 6-7.

a status update with the Commission by May 31, 2019. On May 31, 2019, the Parties filed a Joint Status Update indicating that they were continuing to work to finalize the details of their agreement and committed to make a Joint Filing with the details of the agreement or a status update filing by July 31, 2019.

6. The Parties have continued to work to finalize the details of their agreement; however, a key company employee involved with this process for Westar is leaving the company and as a result, the Parties are not yet prepared to make a Joint Filing with those details because they continue to work to develop the proposal and reach agreement on the details.

Therefore, the Parties commit to either make the Joint Filing with the details of the agreement by October 31, 2019 or make another status update filing at that time.

Respectfully submitted,

*/s/ Robert Vincent*

Robert Elliott Vincent, S. Ct. #26028  
Litigation Counsel  
Kansas Corporation Commission  
1500 S.W. Arrowhead Road  
Topeka, Kansas 66604  
Phone: (785) 271-3273  
E-Mail: r.vincent@kcc.ks.gov

Attorney for Commission Staff

*/s/ David Nickel*

David W. Nickel, S. Ct. #11170  
Attorneys for the CURB  
1500 S.W. Arrowhead Road  
Topeka, Kansas 66604  
Phone: (785) 271-3200  
Fax: (785) 271-3116  
E-Mail: d.nickle@curb.kansas.gov  
tj.connors@curb.kansas.gov

Attorneys for the Citizens' Utility Ratepayer  
Board

*/s/ Terri Pemberton*

Lindsay A. Campbell, S. Ct. #23276  
Executive Vice President – General Counsel  
Southern Pioneer Electric Company  
P.O. Box 430  
Ulysses, Kansas 67880  
Phone: (620) 424-5206  
Fax: (620) 356-4306  
Email: lshepard@pioneerelectric.coop

Glenda Cafer, S. Ct. #13342  
Phone: (785) 271-9991  
Terri Pemberton, S. Ct. #23297  
Phone: (785) 232-2123  
CAFER PEMBERTON LLC  
3321 SW 6th Avenue  
Topeka, Kansas  
Fax: (785) 233-3040  
Email: glenda@caferlaw.com  
terri@caferlaw.com

Attorneys for Southern Pioneer Electric  
Company

*/s/ Cathryn J. Dinges*

Cathryn J. Dinges (#20848)  
Corporate Counsel  
818 South Kansas Avenue  
Topeka, Kansas 66612  
Phone: (785) 575-8344  
Fax: (785) 575-8136  
Email: [Cathy.Dinges@westarenergy.com](mailto:Cathy.Dinges@westarenergy.com)

Attorney for Westar Energy, Inc. and Kansas  
Gas and Electric Company

### CERTIFICATE OF SERVICE

I hereby certify that on this 31<sup>st</sup> day of July, 2019, the foregoing **Joint Status Update** was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to the following parties:

JAMES G. FLAHERTY, ATTORNEY  
ANDERSON & BYRD, L.L.P.  
216 S HICKORY  
PO BOX 17  
OTTAWA, KS 66067  
[jflaherty@andersonbyrd.com](mailto:jflaherty@andersonbyrd.com)

AARON BISHOP  
ATMOS ENERGY CORPORATION  
25090 W 110TH TERR  
OLATHE, KS 66061  
[aaron.bishop@atmosenergy.com](mailto:aaron.bishop@atmosenergy.com)

JENNIFER G. RIES, VICE PRESIDENT,  
RATES AND REGULATORY AFFAIRS-  
COLORADO/KANSAS  
ATMOS ENERGY CORPORATION  
1555 BLAKE ST STE 400  
DENVER, CO 80202  
[jennifer.ries@atmosenergy.com](mailto:jennifer.ries@atmosenergy.com)

DOUGLAS C. WALTHER, ASSOCIATE  
GENERAL COUNSEL  
ATMOS ENERGY CORPORATION  
5420 LBJ FWY STE 1600 (75240)  
P O BOX 650205  
DALLAS, TX 75265-0205  
[DOUGLAS.WALTHER@ATMOSENERGY.COM](mailto:DOUGLAS.WALTHER@ATMOSENERGY.COM)

ROBERT J. AMDOR, MANAGER,  
REGULATORY AFFAIRS  
BLACK HILLS/KANSAS GAS UTILITY  
COMPANY, LLC D/B/A BLACK HILLS  
ENERGY  
1102 EAST 1ST ST  
PAPILLION, NE 68046  
[robert.amdor@blackhillscorp.com](mailto:robert.amdor@blackhillscorp.com)

PATRICK JOYCE, SR MANAGING  
COUNSEL  
BLACK HILLS/KANSAS GAS UTILITY  
COMPANY, LLC D/B/A BLACK HILLS  
ENERGY  
1102 EAST 1ST ST  
PAPILLION, NE 68046  
[patrick.joyce@blackhillscorp.com](mailto:patrick.joyce@blackhillscorp.com)

ANN STICHLER, SR. REGULATORY  
ANALYST-REGULATORY SERVICES  
BLACK HILLS/KANSAS GAS UTILITY  
COMPANY, LLC D/B/A BLACK HILLS  
ENERGY  
1102 EAST 1ST ST  
PAPILLION, NE 68046  
[ann.stichler@blackhillscorp.com](mailto:ann.stichler@blackhillscorp.com)

GLENDA CAFER, ATTORNEY  
CAFER PEMBERTON LLC  
3321 SW 6TH ST  
TOPEKA, KS 66606  
[glenda@caferlaw.com](mailto:glenda@caferlaw.com)

TERRI PEMBERTON, ATTORNEY  
CAFER PEMBERTON LLC  
3321 SW 6TH ST  
TOPEKA, KS 66606  
[terri@caferlaw.com](mailto:terri@caferlaw.com)

THOMAS J. CONNORS, Attorney at Law  
CITIZENS' UTILITY RATEPAYER  
BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[tj.connors@curb.kansas.gov](mailto:tj.connors@curb.kansas.gov)

TODD E. LOVE, ATTORNEY  
CITIZENS' UTILITY RATEPAYER  
BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[t.love@curb.kansas.gov](mailto:t.love@curb.kansas.gov)

DAVID W. NICKEL, CONSUMER  
COUNSEL  
CITIZENS' UTILITY RATEPAYER  
BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[D.NICKEL@CURB.KANSAS.GOV](mailto:D.NICKEL@CURB.KANSAS.GOV)

SHONDA RABB  
CITIZENS' UTILITY RATEPAYER  
BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[s.rabb@curb.kansas.gov](mailto:s.rabb@curb.kansas.gov)

DELLA SMITH  
CITIZENS' UTILITY RATEPAYER  
BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[d.smith@curb.kansas.gov](mailto:d.smith@curb.kansas.gov)

ANGELA CLOVEN, PLANNING AND  
REG SPECIALIST  
EMPIRE DISTRICT ELECTRIC  
COMPANY  
PO BOX 127  
602 S JOPLIN AVENUE  
JOPLIN, MO 64802-0127  
[Angela.Cloven@libertyutilities.com](mailto:Angela.Cloven@libertyutilities.com)

ROBERT J. HACK, LEAD  
REGULATORY COUNSEL  
KANSAS CITY POWER & LIGHT  
COMPANY  
ONE KANSAS CITY PL, 1200 MAIN ST  
19TH FLOOR (64105)  
PO BOX 418679  
KANSAS CITY, MO 64141-9679  
[ROB.HACK@KCPL.COM](mailto:ROB.HACK@KCPL.COM)

ROGER W. STEINER, CORPORATE  
COUNSEL  
KANSAS CITY POWER & LIGHT  
COMPANY  
ONE KANSAS CITY PL, 1200 MAIN ST  
19TH FLOOR (64105)  
PO BOX 418679  
KANSAS CITY, MO 64141-9679  
[roger.steiner@kcpl.com](mailto:roger.steiner@kcpl.com)

NICOLE A. WEHRY, SENIOR  
REGULATORY COMMUNICATIONS  
SPECIALIST  
KANSAS CITY POWER & LIGHT  
COMPANY  
ONE KANSAS CITY PL, 1200 MAIN ST  
19TH FLOOR (64105)  
PO BOX 418679  
KANSAS CITY, MO 64141-9679  
[NICOLE.WEHRY@KCPL.COM](mailto:NICOLE.WEHRY@KCPL.COM)

ANTHONY WESTENKIRCHNER, SENI  
OR PARALEGAL  
KANSAS CITY POWER & LIGHT  
COMPANY  
ONE KANSAS CITY PL, 1200 MAIN ST  
19TH FLOOR (64105)  
PO BOX 418679  
KANSAS CITY, MO 64141-9679  
[anthony.westenkirchner@kcpl.com](mailto:anthony.westenkirchner@kcpl.com)

BRIAN G. FEDOTIN, DEPUTY  
GENERAL COUNSEL  
KANSAS CORPORATION  
COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[b.fedotin@kcc.ks.gov](mailto:b.fedotin@kcc.ks.gov)

CARLY MASENTHIN, LITIGATION  
COUNSEL  
KANSAS CORPORATION  
COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[c.masenthin@kcc.ks.gov](mailto:c.masenthin@kcc.ks.gov)

ROBERT VINCENT, LITIGATION  
COUNSEL  
KANSAS CORPORATION  
COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[r.vincent@kcc.ks.gov](mailto:r.vincent@kcc.ks.gov)

BRUCE GRAHAM, CHIEF EXECUTIVE  
OFFICER  
KANSAS ELECTRIC COOPERATIVE,  
INC.  
7332 SW 21ST STREET  
PO BOX 4267  
TOPEKA, KS 66604-0267  
[bgraham@kec.org](mailto:bgraham@kec.org)

DOUGLAS SHEPHERD, VP,  
MANAGEMENT CONSULTING  
SERVICES  
KANSAS ELECTRIC COOPERATIVE,  
INC.  
7332 SW 21ST STREET  
PO BOX 4267  
TOPEKA, KS 66604-0267  
[dshepherd@kec.org](mailto:dshepherd@kec.org)

SUSAN B. CUNNINGHAM, SVP,  
Regulatory and Government Affairs,  
General Counsel  
KANSAS ELECTRIC POWER CO-OP,  
INC.  
600 SW CORPORATE VIEW (66615)  
PO BOX 4877  
TOPEKA, KS 66604-0877  
[scunningham@kepco.org](mailto:scunningham@kepco.org)

JANET BUCHANAN, DIRECTOR-  
REGULATORY AFFAIRS  
KANSAS GAS SERVICE, A DIVISION  
OF ONE GAS, INC.  
7421 W 129TH ST  
OVERLAND PARK, KS 66213-2713  
[janet.buchanan@onegas.com](mailto:janet.buchanan@onegas.com)

JUDY JENKINS HITCHYE, MANAGING  
ATTORNEY  
KANSAS GAS SERVICE, A DIVISION  
OF ONE GAS, INC.  
7421 W 129TH ST  
OVERLAND PARK, KS 66213-2713  
[judy.jenkins@onegas.com](mailto:judy.jenkins@onegas.com)

LINDSAY CAMPBELL, EXECUTIVE VP  
- GENERAL COUNSEL  
SOUTHERN PIONEER ELECTRIC  
COMPANY  
1850 W OKLAHOMA  
PO BOX 403  
ULYSSES, KS 67880-0430  
[lcampbell@pioneerelectric.coop](mailto:lcampbell@pioneerelectric.coop)

RANDY MAGNISON, EXEC VP & ASST  
CEO  
SOUTHERN PIONEER ELECTRIC  
COMPANY  
1850 W OKLAHOMA  
PO BOX 403  
ULYSSES, KS 67880-0430  
[rmagnison@pioneerelectric.coop](mailto:rmagnison@pioneerelectric.coop)

*1st Cathryn J. Dinges*