BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Black)	
Hills/Kansas Gas Utility Company, LLC, d/b/a)	
Black Hills Energy, for Approval of the)	Docket No. 14-BHCG-593-TAR
Commission for Gas System Reliability Surcharge)	
per K.S.A. 66-2201 through 66-2204)	

RESPONSE OF BLACK HILLS ENERGY TO STAFF'S REPORT AND RECOMMENDATION

Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy ("Black Hills"), files its response to the Kansas Corporation Commission ("Commission") Staff's ("Staff") Report and Recommendation.

- 1. Staff made the following recommendations in its Report and Recommendation relating to Black Hills' Gas System Reliability Surcharge ("GSRS") application:
 - a. Approve Black Hills' GSRS increase of \$657,961 to be collected via the per customer surcharge listed in Exhibit 2 of Staff's Report and Recommendation;
 - b. Black Hills must file updated GSRS tariffs to reflect the changes in the per customer surcharge as discussed in Staff's Report and Recommendation prior to billing the new surcharge;
 - c. Black Hills should refund \$90,441 to customers in the first month of the Company's new GSRS recovery period; and
 - d. Black Hills will immediately file a GSRS true-up for the period of May 2014 to the date the base rates in Docket No. 14-BHCG-502-RTS become effective as required by K.S.A. 66-2204(f)(2).
 - 2. Black Hills has reviewed and discussed the recommendations made by Staff in its

Report and Recommendation and concurs with the Staff's recommendations as outlined above.

WHEREFORE, Black Hills requests the Commission approve its application subject to the recommendations made by Staff in its Report and Recommendation.

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

Attorneys for Black Hills/Kansas Gas Utility Company,

LLC, d/b/a Black Hills Energy

VERIFICATION

STATE OF KANSAS)
)ss:
COUNTY OF FRANKLIN)

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

That he is the attorney for Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy ("Black Hills"), named in the foregoing Response to Staff's Report and Recommendation, and is duly authorized to make this affidavit; that he has read the foregoing Response, and knows the contents thereof; and that the facts set forth therein are true.

James G. Flaherty

SUBSCRIBED AND SWORN to before me this 8th day of September, 2014.

NOTARY PUBLIC - State of Kansas RONDA BOSSMAN My Appt. Exp. 5/25/30/K

Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Response to Staff's Report and Recommendation was sent by electronic mail, this 8th day of September, 2014, addressed to:

Niki Christopher Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 n.christopher@curb.kansas.gov

Anastacia Harden Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 s.harden@curb.kansas.gov

Della Smith
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
d.smith@curb.kansas.gov

Shonda Smith
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
sd.smith@curb.kansas.gov

David R. Springe Consumer Counsel Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 d.springe@curb.kansas.gov

Samuel Feather Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604-4027 s.feather@kcc.ks.gov

James G. Flaherty