

## Citizens' Utility Ratepayer Board

**Board Members:**  
Robert L. Harvey, Chair  
Brian Weber, Vice-Chair  
Ellen K. Janoski, Member  
Bob Kovar, Member  
James L. Mullin II, Member



**State of Kansas**  
*Sam Brownback, Governor*

David Springe, Consumer Counsel  
1500 S.W. Arrowhead Road  
Topeka, Kansas 66604-4027  
Phone: (785) 271-3200  
Fax: (785) 271-3116  
<http://curb.kansas.gov>

January 7, 2015

Office of the Executive Director  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604

In re: 15-WSEE-188-MIS

Office of the Executive Director:

On January 7, 2015, the Citizens' Utility Ratepayer Board (CURB) filed its Comments on the Commission Staff's Report and Recommendation in the above-captioned docket.

CURB mistakenly filed a preliminary draft of its Comments, rather than the final draft. The errors are limited to language included in the second paragraph on page one of the filing.

Attached is the corrected version of page one to replace the page filed with the Commission. CURB regrets the error and apologizes for any inconvenience this may cause.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Niki Christopher", with a long horizontal line extending to the right.

Niki Christopher #19311  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Road  
Topeka, KS 66604  
(785) 271-3200  
(785) 271-3116 Fax

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Notice and Application                    )  
of Westar Energy, Inc. and Kansas Gas and                    ) Docket No. 15-WSEE-188-MIS  
Electric Company for a Limited Waiver of                    )  
the Billing Standards.    )

**CURB's Comments on the Commission Staff's Report and Recommendation**

The Citizens' Utility Ratepayer Board (CURB) offers its comments on the *Report and Recommendation* of the Staff of the Kansas Corporation Commission concerning the above-captioned docket.

In this docket, Westar Energy, Inc. and Kansas Gas and Electric Company (Westar) has requested a waiver of the notice requirement that a Westar employee must make personal contact with the customer and afford the customer an opportunity to pay the overdue bill before disconnecting electricity to the home. The requested waiver would apply whether or not customers' homes are equipped with digital meters, which can be remotely disconnected. These customers would instead be contacted via text, phone call or email, using the method of the customer's choice.

Staff recommends that the Commission deny the requested waiver to Westar and instead open a generic docket to address specifically whether notice requirements should be changed where digital meters have been installed. Staff notes that digital meters are currently being installed by Westar and Kansas City Power and Light throughout their territories, and that there will be broad areas of the state that will be served by digital meters in the next few years. While acknowledging that digital metering technology affords opportunities for considerable savings to the utilities by enabling them to connect and disconnect customers remotely, Staff suggests that proposing changes

Respectfully submitted,



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David Springe, Consumer Counsel #15619

Niki Christopher #19311

Citizens' Utility Ratepayer Board

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Topeka, KS 66604

(785) 271-3200

(785) 271-3116 Fax



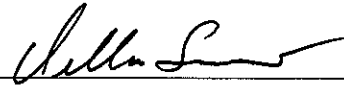
**CERTIFICATE OF SERVICE**

15-WSEE-188-MIS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 7<sup>th</sup> day of January, 2015, to the following:

SAMUEL FEATHER, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604-4027  
[s.feather@kcc.ks.gov](mailto:s.feather@kcc.ks.gov)

CATHRYN J. DINGES, SENIOR CORPORATE COUNSEL  
WESTAR ENERGY, INC.  
818 SOUTH KANSAS AVE  
PO BOX 889  
TOPEKA, KS 66601-0889  
[Cathy.Dinges@westarenergy.com](mailto:Cathy.Dinges@westarenergy.com)



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Della Smith  
Administrative Specialist