

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

In the Matter of the Investigation into)
Black Hills/Kansas Gas Utility Company,)
LLC, d/b/a Black Hills Energy, Regarding)
the February 2021 Winter Weather Events)
as Contemplated by Docket No. 21-GIMX-)
303-MIS

Docket No. 21-BHCG-334-GIG

DIRECT TESTIMONY OF ROBERT W. DANIEL

ON BEHALF OF

**BLACK HILLS/KANSAS GAS UTILITY
COMPANY, LLC, d/b/a BLACK HILLS ENERGY**

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	WINTER STORM URI.....	3
III.	FEBRUARY 2021 GAS COST CALCULATION.....	5
IV.	PROPOSAL FOR RECOVERY OF GAS COSTS	6
V.	RECOMMENDATIONS.....	11

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

A. My name is Robert W. Daniel. My business address is 655 East Millsap Road, Fayetteville, Arkansas 72703. I am employed by Black Hills Service Company (“BHSC”), a subsidiary of Black Hills Corporation (“BHC”), as Manager of Regulatory and Finance.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of Black Hills/Kansas Gas Utility Company, LLC (“Black Hills” or “the Company”). Black Hills is a wholly-owned subsidiary of Black Hills Utility Holdings, Inc. (“BHUH”). BHUH is a wholly-owned subsidiary of BHC.

Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?

A. I am responsible for regulatory matters and financial planning and analysis for Black Hills. In this role, I oversee and participate in the development of regulatory strategy, policy, tariffs, and regulatory filings in Kansas. My team is also responsible for financial planning and analysis, including the annual budgeting process and monthly and quarterly analysis of operating results.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

A. My education, employment history, and professional experience are provided on Direct Exhibit RWD-1.

1 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

2 A. Yes, I am sponsoring the following Direct Exhibits:

Direct Exhibit RWD-1	Educational and Professional Background
Direct Exhibit RWD-2	Calculation of Incremental Extraordinary Gas Costs Resulting from Winter Storm Uri
CONFIDENTIAL Direct Exhibit RWD-3	Supporting Data for Incremental Extraordinary Gas Cost Calculation
Direct Exhibit RWD-4	Monthly Bill Impacts under the Company's Proposal and Proposed Rates by Rate Schedule
Direct Exhibit RWD-5	Allocation of February 2021 Incremental Extraordinary Gas Costs Resulting from Winter Storm Uri
CONFIDENTIAL Direct Exhibit RWD-6	Compliance Report for Incremental Extraordinary Gas Costs Resulting from Winter Storm Uri

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

4 A. Pursuant to the Commission's *ORDER ADOPTING STAFF'S REPORT AND*
5 *RECOMMENDATION TO OPEN COMPANY-SPECIFIC INVESTIGATIONS* issued on
6 March 9, 2021 in Docket No. 21-GIMX-303-MIS and in this Docket, the Company is
7 proposing in this filing its plan to minimize the financial effects to customers of the costs
8 incurred during the February 2021 Winter Weather Event ("Winter Storm Uri"). As such,
9 the purpose of my testimony is to discuss and make recommendations regarding the recovery
10 of extraordinary gas costs the Company incurred related to Winter Storm Uri. My
11 testimony supports Black Hills' proposal to recover the incremental extraordinary cost of
12 gas over a five-year period instead of over twelve months, and to calculate carrying charges
13 based on the Company's current weighted average cost of capital of 7.98%. Finally, my

1 testimony supports Black Hills’ proposed Winter Storm Uri Gas Cost Adjustment (“GCA”)
2 rates for each applicable rate schedule, including the Company’s proposal to allocate the
3 incremental gas cost to each applicable rate schedule based on February 2021 usage.
4 Company witness Mr. Kent J. Kopetzky further supports Black Hills’ request by providing
5 information on how the Company plans its natural gas supply purchases and how Black Hills
6 implemented this plan, consistent with industry best practices, to purchase gas supplies to
7 ensure reliable service for our natural gas customers during the extreme market and weather
8 conditions of Winter Storm Uri.

9 **II. WINTER STORM URI**

10 **Q. PLEASE DESCRIBE THE FEBRUARY WINTER WEATHER EVENT KNOWN AS**
11 **WINTER STORM URI.**

12 **A.** From February 7, 2021 through February 19, 2021, Kansas experienced extreme weather
13 events resulting in severe and prolonged sub-zero temperatures across Black Hills’ service
14 area. During this winter weather event, natural gas wells and production and processing
15 facilities in certain parts of the nation froze off resulting in a major portion of the nation’s
16 gas supply going offline. The Energy Information Administration (“EIA”) reported that
17 U.S. dry natural gas production fell to 69.7 billion cubic feet per day (Bcf/d) on February
18 17, a decline of 21%, or down nearly 18.9 Bcf/d from the week ending February 13. Also,
19 according to EIA, natural gas production in Texas fell almost 45%, from 21.3 Bcf/d during
20 the week ending February 13, to a daily low of 11.8 Bcf/d on Wednesday, February 17.¹

¹ EIA website article: [Texas natural gas production fell by almost half during recent cold snap - Today in Energy - U.S. Energy Information Administration \(EIA\); https://www.eia.gov/todayinenergy/detail.php?id=46896](https://www.eia.gov/todayinenergy/detail.php?id=46896)

1 EIA further reported that the decline in natural gas production was mostly a result of freeze-
2 offs, which occur when water and other liquids in the raw natural gas stream freeze at the
3 wellhead or in natural gas gathering lines near production activities. At the same time
4 natural gas demand for both direct use and power generation across Black Hills' system and
5 much of the nation was very high.

6 **Q. DID THIS COMBINATION OF HIGH DEMAND AND SHORT SUPPLY AFFECT**
7 **THE PRICE BLACK HILLS PAID FOR NATURAL GAS TO SERVE ITS**
8 **CUSTOMERS?**

9 A. Yes. As a result of the increased demand for electric and natural gas energy, Black Hills
10 experienced significant natural gas commodity cost increases from its suppliers. During
11 Winter Storm Uri, the daily market index spiked significantly, resulting in Black Hills paying
12 prices as high as \$623 per Mcf for gas purchased at the daily price index. These natural gas
13 purchases were critical to maintaining system reliability and to keep services available to
14 customers in severe, life-threatening weather conditions. The Company's prudent
15 management of existing infrastructure, gas supply portfolio planning, diversity of suppliers,
16 interstate transportation capacity and storage assets acquired by Black Hills prior to Winter
17 Storm Uri mitigated an even more extreme level of costs that may have been incurred during
18 Winter Storm Uri without those natural gas assets in place. These purchases were also
19 necessary to comply with the Commission's Emergency Order in Docket No. 21-GIMX-
20 303-MIS, which required jurisdictional gas utilities to "do all things possible and necessary
21 to ensure natural gas and electricity utility services continue to be provided to their customers
22 in the State."

1 **III. FEBRUARY 2021 GAS COST CALCULATION**

2 **Q. WHAT IS THE MAGNITUDE OF THE FEBRUARY 2021 GAS COSTS FOR**
3 **BLACK HILLS ENERGY?**

4 A. Black Hills’ natural gas commodity costs for the month of February were \$93,621,859. This
5 includes the commodity cost of gas, upstream pipeline commodity costs, storage
6 withdrawals, and all other gas costs that are defined in the Determination of Purchased Gas
7 Cost Adjustment section of the Purchased Gas Cost Adjustment (“PGA”) rate schedule. In
8 its calculation of total gas costs, the Company excluded monthly demand charges. For
9 comparison, the Company’s natural gas commodity costs for the month of February over the
10 past three years has averaged approximately \$4.6 million.

11 **Q. HOW DOES THIS AMOUNT COMPARE WITH THE COST OF GAS INCLUDED**
12 **IN THE COMPANY’S FEBRUARY PGA RATE?**

13 A. Excluding demand charges, the estimated amount of gas costs included in the Company’s
14 February 2021 PGA rate is \$5,724,114. The Company used the commodity portion of its
15 February Weighted Average Cost of Gas (“WACOG”) of \$2.4277 to derive the estimated
16 commodity-only amounts.

17 **Q. WHAT ARE BLACK HILLS’ INCREMENTAL FEBRUARY 2021 GAS COSTS**
18 **THAT ARE INCLUDED IN THIS FILING?**

19 A. Black Hills calculated its incremental gas costs by subtracting the commodity portion of its
20 February 2021 WACOG from the actual amount of gas costs incurred and attributable to
21 February 2021. The incremental gas costs related to February 2021 are \$87,897,745, as
22 shown on Direct Exhibit RWD-2. Data supporting the calculation is shown on

1 CONFIDENTIAL Direct Exhibit RWD-3. The Company will update the incremental gas
2 costs amount to the extent that any additional invoices or credits are submitted to the
3 Company and following review by the Company's Gas Supply department.

4 **IV. PROPOSAL FOR RECOVERY OF GAS COSTS**

5 **Q. UNDER THE COMPANY'S PGA RATE SCHEDULE, HOW WOULD**
6 **DIFFERENCES IN ESTIMATED COSTS AND ACTUAL COSTS OF GAS**
7 **TYPICALLY BE TREATED?**

8 A. Pursuant to the Settlement Provision in the Company's PGA rate schedule, the differences
9 between the actual cost of gas and the recovery of gas costs would produce a cumulative
10 balance of over-recovered or under-recovered costs for the twelve months ending September
11 30. An Actual Cost Adjustment ("ACA") is then calculated to collect or refund these
12 amounts until superseded by subsequent ACA's, which is typically a twelve-month period.
13 Due to the magnitude of the incremental gas costs from Winter Storm Uri, recovering the
14 under-recovered balance over twelve months as outlined in the Settlement Provision would
15 result in an average monthly bill increase of \$53.51, or 96%, for an average residential
16 customer using 56 therms per month. In essence, following the normal ACA calculation,
17 customers' bills would nearly double beginning November 2021.

18 **Q. WHAT IS THE COMPANY'S PROPOSED METHOD OF RECOVERY TO**
19 **MITIGATE THE FINANCIAL EFFECT ON CUSTOMERS?**

20 A. Black Hills proposes to recover the incremental gas costs from Winter Storm Uri over a five-
21 year period instead of over twelve months, with carrying charges applied at the Company's
22 weighted average cost of capital ("WACC") of 7.98% due to the longer recovery timeframe.

1 **Q. WHAT IS THE IMPACT TO A TYPICAL RESIDENTIAL CUSTOMER UNDER**
2 **THE COMPANY’S PROPOSAL TO RECOVER THE COST OVER A FIVE-YEAR**
3 **PERIOD?**

4 A. As shown on Direct Exhibit RWD-4, the typical residential customer using 56 therms per
5 month would have a \$12.23 monthly bill increase, or approximately 22%.

6 **Q. IS THE COMPANY’S PROPOSAL TO MITIGATE THE IMPACT ON**
7 **CUSTOMERS REASONABLE?**

8 A. Yes. To mitigate the impact to customers, Black Hills is proposing to recover the
9 incremental gas costs resulting from Winter Storm Uri over a five-year period instead of
10 twelve months. Due to the longer period of recovery, and consistent with the Commission’s
11 Emergency Order issued on February 15th in Docket No. 21-GIMX-303-MIS, authorizing
12 utilities to defer extraordinary costs related to Winter Storm Uri at the Company’s weighted
13 average cost of capital, Black Hills proposes to apply carrying costs of 7.98%. This is
14 reflective of the longer-term financing needed to allow for recovery of these incremental gas
15 costs over a five-year term.

16 **Q. DESCRIBE THE COST ALLOCATION METHODOLOGY BLACK HILLS IS**
17 **REQUESTING AUTHORITY TO USE IN DETERMINING RECOVERY BY RATE**
18 **SCHEDULE.**

19 A. Black Hills is proposing to use February 2021 gas usage as the basis to allocate the
20 incremental gas costs proportionally to each sales rate schedule, as shown on Direct Exhibit
21 RWD-5. The Company does not have daily measurement information available for all sales
22 rate schedules to specifically identify gas usage by rate schedule for each day of Winter

1 Storm Uri. However, the use of February 2021 gas usage provides a reasonable basis to
2 allocate the extraordinary gas costs to sales rate schedules, accounting for the higher heating
3 load usage during the extreme cold temperatures during Winter Storm Uri.

4 In its proposal, the Company excluded customers billed under the Irrigation sales
5 rate schedule. Irrigation customers are not peak demand customers, and their usage is based
6 on a number of factors including season, rainfall, and temperature.

7 Additionally, the Company included the Small Volume Firm and Small Volume
8 Interruptible customers as one combined class for rate purposes. In the Company’s pending
9 rate case proceeding, Docket No. 21-BHCG-418-RTS, the Company has proposed removing
10 the Small Volume Interruptible customer class and moving those customers to the Small
11 Volume Firm service rate schedule.

12 **Q. WHAT IS THE PROPOSED SURCHARGE BY MONTH FOR EACH RATE**
13 **SCHEDULE?**

14 A. The Company proposes to apply the following surcharge amounts to the rate schedules as
15 shown below and on Direct Exhibit RWD-4:

Rate Schedule	Monthly Rate/Therm
RS-1	\$ 0.218057
SC-1	\$ 0.255884
SVF - SVI	\$ 0.212001
LVI	\$ 0.041231
LVF	\$ 0.205751

1 **Q. WILL THE WINTER STORM URI RATE AND TOTAL AMOUNT CHARGED**
2 **APPEAR AS A SEPARATE LINE ITEM ON A CUSTOMER’S BILL?**

3 A. Yes, the Winter Storm Uri rate and billed amount will appear as a separate line item on a
4 customer’s bill. Black Hills’ sales customers currently have a line item on their bill for the
5 PGA rates. The line-item billing allows the Company to efficiently report the recovery
6 information from the billing system and allows each rate to be printed on the bill. The line-
7 item billing for the Winter Storm Uri rate will also provide transparency to customers and
8 aid in explaining the impact on a customer’s bill.

9 **Q. WHAT IS THE PROPOSED EFFECTIVE DATE OF THE RATES OUTLINED**
10 **ABOVE?**

11 A. Black Hills proposes implementing rates on an interim basis beginning August 1, 2021,
12 subject to true-up pending the outcome of this docket. While the ACA would typically
13 become effective on November 1 of each year, the Company is proposing to implement the
14 Winter Storm Uri rates on August 1 in order to reduce the amount of carrying charges
15 accumulating on the incremental cost balance and to provide timely recovery of these
16 extraordinary costs.

17 **Q. WHY IS BLACK HILLS NOT PROPOSING TO SECURITIZE THE COSTS**
18 **RELATED TO WINTER STORM URI PURSUANT TO THE RECENTLY**
19 **ENACTED STATUTE ENABLING SECURITIZATION (A.K.A HOUSE BILL 2072,**
20 **UTILITIES SECURITIZATION ACT)?**

21 A. The incremental gas costs for the Winter Storm Uri are \$87.9 million. This amount is less
22 than the amount typically required to attract the interest of investors to review and invest in

1 securitized bonds. This lower issuance size would increase the interest rate on the bonds
2 compared to a larger securitization. Additionally, the upfront issuance costs and ongoing
3 costs to administer the bonds for a securitization are more significant than for a standard
4 senior, unsecured debt issuance (issued by Black Hills' parent, Black Hills Corporation).
5 These costs for securitization are mostly fixed or have minimums that must be met such that
6 the costs for a smaller issuance can outweigh any benefits. BHC does not currently plan to
7 pursue securitization of incremental gas costs from Winter Storm Uri in any regulatory
8 jurisdiction within its eight-state footprint.

9 **Q. HOW DOES THE COMPANY PROPOSE TO TREAT ANY OVER- OR UNDER-**
10 **COLLECTIONS OF THE WINTER STORM URI COSTS?**

11 A. Consistent with the timing of the Company's ACA under the normal PGA procedure, the
12 Company will true-up actual recoveries compared to expected recoveries for periods ending
13 September 30th of each year. The difference will be included as a charge or credit for the
14 next twelve months through the Winter Storm Uri rate. The final true-up will occur after
15 five years, and any over- or under-collected amounts will be included in the PGA to collect
16 or refund any remaining differences.

17 **Q. WILL THE WINTER STORM URI CHARGE BE APPLIED TO THE CITY OF**
18 **FORD CUSTOMERS IF THE COMPANY'S PROPOSED ACQUISITION IS**
19 **APPROVED BY THE COMMISSION IN DOCKET NO. 21-BHCG-417-ACQ?**

20 A. No. City of Ford customers were not part of Black Hills' customer base during Winter
21 Storm Uri. Including them within the Winter Storm Uri charge could result in those
22 customers paying both for extraordinary gas costs incurred by the City of Ford on behalf of

1 its customers during Winter Storm Uri and paying for gas costs incurred by Black Hills
2 during Winter Storm Uri. If the Company's pending acquisition is approved, City of Ford
3 customers will only pay the normal PGA rate applied to all sales customers, which excludes
4 the impact of Winter Storm Uri.

5 **Q. HAS THE COMPANY COMPLIED WITH THE COMMISSION'S ORDER IN**
6 **DOCKET NO. 21-GIMX-303-MIS?**

7 A. Yes. In addition to the Company's proposal in this filing to mitigate the financial impact
8 of Winter Storm Uri on customers, Black Hills has provided a Compliance Report detailing
9 the costs of Winter Storm Uri as shown on CONFIDENTIAL Direct Exhibit RWD-6. The
10 detailed information contained in the Compliance Report was provided to the parties in
11 response to Staff data requests KCC-11 and KCC-12 in this docket.

12 **V. RECOMMENDATIONS**

13 **Q. WHAT ARE YOUR RECOMMENDATIONS?**

14 A. I recommend the Commission approve the following:

- 15 1. Recovery of the incremental Winter Storm Uri gas costs of \$87.9 million over five
16 years, beginning on August 1, 2021, subject to true-up based on the outcome of this
17 Docket;
- 18 2. Application of carrying costs using the Company's WACC of 7.98%;
- 19 3. Reflection of the Winter Storm Uri gas cost rates as a separate line item on the
20 customer's bill, which will facilitate tracking recoveries in the billing system
21 efficiently;

1 4. Waiver of any provisions of the Company's PGA/ACA tariffs to allow the Company
2 to recover the gas costs from customers over the proposed five-year period.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 A. Yes.

**EDUCATION, EMPLOYMENT HISTORY
AND PROFESSIONAL EXPERIENCE**

I graduated from the University of Central Arkansas with a Bachelor of Business Administration degree in Finance in 2006. In 2009, I received my Master of Business Administration degree from the University of Arkansas at Little Rock, with a concentration in Finance. While earning my MBA, I accepted a position as a Financial Analyst with the Arkansas Public Service Commission. Over the course of six years, I was promoted to Senior Financial Analyst and was primarily responsible for cost of capital, return on equity analysis, riders and rate mechanisms, and other rate-related issues.

In 2015, I accepted a Senior Regulatory Analyst position with CenterPoint Energy. I held various positions of increasing responsibility, including Manager of Rates and Regulatory. I supported regulatory policy and filings for Arkansas and Oklahoma.

In 2020, I joined Black Hills as Manager of Regulatory and Finance. In this role, my team and I are responsible for overseeing and participating in the development of regulatory strategy, policy, tariffs, and regulatory filings in Kansas. My team is also responsible for financial planning and analysis, including the annual budgeting process and monthly and quarterly analysis of operating results.

Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy
Calculation of Incremental Gas Costs

	<u>Dekatherms</u>	<u>Costs</u>	<u>\$/Dth</u>
Firm Actual Gas Costs Less Fixed Transp.	2,306,555	\$ 91,585,702.10	
Interr Actual Gas Costs	51,279	\$ 2,036,156.59	
	<u>2,357,834</u>	<u>\$ 93,621,858.69</u>	\$ 39.7067
Febr 2021 Commodity WACOG	2,357,834	\$ 5,724,113.75	\$ 2.4277
Difference - Winter Storm Uri Impact		<u><u>\$ 87,897,744.95</u></u>	

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Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy

Tariff	Customer Charge	GSRS Factor	Commodity (Delivery)	PGA	WNA	AVTS	Fixed Charges	Variable Charges	Monthly UPC	Monthly Avg. Total Bill	Monthly Surcharge Bill -5 YR	Monthly % inc	Proposed Rate
	\$/month	\$/month	\$/dth	\$/dth	\$/dth	\$/dth	\$/dth	\$/dth	therms				\$/therm
RS-1	\$ 16.94	\$ 2.39	\$ 1.6833	\$ 4.7077	\$ 0.0863	\$ (0.0061)	\$ 19.33	\$ 6.4712	56.1	\$ 55.63	12.23	22%	\$ 0.218057
SC-1	\$ 25.94	\$ 5.96	\$ 1.6833	\$ 4.7077	\$ 0.0863	\$ (0.0061)	\$ 31.90	\$ 6.4712	99.5	\$ 96.28	25.46	26%	\$ 0.255884
SVF	\$ 52.97	\$ 37.72	\$ 1.4700	\$ 4.7077	\$ 0.0863	\$ (0.0061)	\$ 90.69	\$ 6.2579	781.8	\$ 579.95	166.47	29%	\$ 0.212001
SVI	\$ 52.97	\$ 37.72	\$ 1.4700	\$ 3.2460	\$ -	\$ (0.0061)	\$ 90.69	\$ 4.7099	842.0	\$ 487.28	178.51	37%	\$ 0.212001
LVI	\$ 333.10	\$ 279.07	\$ 0.6800	\$ 3.2460	\$ -	\$ (0.0061)	\$ 612.17	\$ 3.9199	32,117.1	\$ 13,201.79	1,324.22	10%	\$ 0.041231
LVF	\$ 333.10	\$ 279.07	\$ 0.6800	\$ 4.7077	\$ 0.0863	\$ (0.0061)	\$ 612.17	\$ 5.4679	8,070.5	\$ 5,025.06	1,660.52	33%	\$ 0.205751

Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy
Allocation of Incremental Gas Costs
2021 Winter Storm Uri

Incremental Gas Costs \$ 87,897,745

Class	2021 PGA Avg. Cust.	2021 PGA Therms	Yearly Avg. UPC	Monthly Avg. UPC	February 2021 Usage	Allocation Feb-21 Usage	Gas Cost Allocation Feb-21 Usage
RS-1	102,803	69,192,124	673	56	15,321,103	69.54%	\$ 61,123,180
SC-1	9,203	10,986,166	1,194	99	2,842,890	12.90%	\$ 11,341,643
SVF and SVI	1,445	13,620,155	9,423	785	2,744,598	12.46%	\$ 10,949,509
LVI	21	8,093,517	385,406	32,117	341,831	1.55%	\$ 1,363,727
LVF	39	3,744,721	96,846	8,071	781,979	3.55%	\$ 3,119,687
Total	113,511	105,636,683	493,542	41,128	22,032,401	100.00%	\$ 87,897,745

PUBLIC VERSION

**** Direct Exhibit RWD-6
CONFIDENTIAL**

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 16th day of June 2021, addressed to:

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