

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

In the Matter of the Filing of Written)	
Documents and Gas Purchase Reports by)	
UtiliCorp United Inc., d/b/a Peoples)	
Natural Gas Company and Kansas Public)	Docket No. 02-UTCG-371-GPR
Service Company, as Prescribed by)	
Commission Order Dated June 21, 2001 in)	
Docket No. 106,850-U / 75-GIMC-009-)	
GIG.)	

CURB'S RESPONSE TO STAFF'S MEMORANDUM

The Citizens' Utility Ratepayer Board (CURB) submits its response to the *Notice of Filing of Staff Memorandum* (Memorandum) filed by the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) in the above-captioned docket on July 28, 2017.

1. On June 1, 2001, in Docket No. 106,850-U/75-GIMC-009-GIC (75-GIMC-009-GIG), the Commission issued an Order which requires Black Hills/Kansas Gas Utility Company, d/b/a Black Hills Energy (Black Hills), and other natural gas utilities in the state, to file an annual report of its Gas Purchase Plan each year in utility-specific docket. The Gas Purchase Plan must include an outline of natural gas supply, transportation contracts, and purchasing strategy.¹

2. On December 13, 2001, CURB filed its Petition to Intervene. CURB's intervention in this docket was approved by the Commission on January 4, 2002.

3. On June 12, 2017, CURB, Staff, and Black Hills met via a telephone conference to discuss Black Hills' 2017-2018 Gas Purchase Plan.

¹ 75-GIMC-009-GIG, Order, ¶ 4.

4. On July 28, 2017, Staff filed its Memorandum requesting that the Commission take no action at this time regarding Black Hills gas purchasing practices.² More specifically, Staff analyzed Black Hills' 2017-2018 Gas Purchase Plan and believes that Black Hills purchasing practices are reasonable and is able to supply sufficient gas for the 2017-2018 heating season.³

5. CURB analyzed Black Hills' 2017-2018 Gas Purchase Plan, and believes that Black Hills purchasing practices are reasonable and is able to supply sufficient gas for the 2017-2018 heating season. Further, CURB agrees with Staff that no Commission action is required at this time. CURB will also continue to monitor Black Hills' gas purchasing practices. CURB submits that Staff's recommendation in its Memorandum is reasonable, and is in the best interests of Black Hills' residential and small commercial ratepayers.

WHEREFORE, CURB respectfully recommends that the Commission adopt Staff's recommendation, in its Memorandum, which requests that no action be taken in this docket by the Commission at this time, and for such other relief as the Commission deems just and proper.

Respectfully submitted,



David Nickel, Consumer Counsel #11170

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² Memorandum, Attachment, p. 1.

³ *Id.*

VERIFICATION

STATE OF KANSAS

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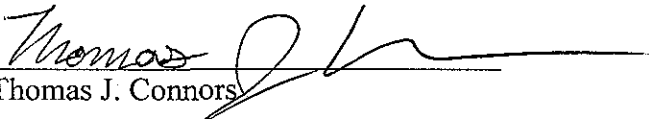
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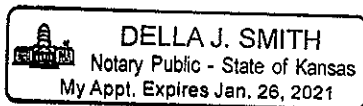
COUNTY OF SHAWNEE

)

I, Thomas J. Connors, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.


Thomas J. Connors

SUBSCRIBED AND SWORN to before me this 1st day of August, 2017.




Notary Public

My Commission expires: 01-26-2021.

CERTIFICATE OF SERVICE


02-UTCG-371-GPR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 1st day of August, 2017, to the following:

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