

Respectfully submitted,
/s/ Carly R. Masenthin
Carly R. Masenthin, #27944
Senior Litigation Counsel
1500 SW Arrowhead Rd
Topeka, KS 66604
Phone (785) 271-3265
Email: Carly.Masenthin@ks.gov

Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

Laura Kelly, Governor

REPORT AND RECOMMENDATION UTILITIES DIVISION

TO: Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

FROM: Justin Prentiss, Senior Rate Analyst
Justin Grady, Deputy Director of Utilities
Jeff McClanahan, Director of Utilities

DATE: November 13, 2024

SUBJECT: Docket No. 24-KGSG-837-COM: In the Matter of the Complaint Against Kansas Gas Service by Leah Twigg

EXECUTIVE SUMMARY:

On June 7, 2024, Leah Twigg filed a formal complaint against Kansas Gas Service (KGS).¹ Ms. Twigg claims that she received a letter from KGS explaining that she owed \$722.01 for gas service at a previous location. When Ms. Twigg spoke to a KGS customer service agent to find out what the charge was for, she was informed it was a credit for a previous payment. She then later received a bill for that exact amount. She claimed she went back and forth with customer service representatives for a month trying to understand this issue, eventually escalating it to a supervisor. Ms. Twigg claims that when she did talk to a supervisor, she was told to give a confirmation number and the amount paid to back up the claim that the charge was actually a credit for a previous payment. At some point during her conversations with KGS, Ms. Twigg's gas service was shut off for non-payment, with KGS informing Ms. Twigg that she owed over \$1,200. Ms. Twigg also claims in the complaint that service at her previous address was not disconnected by KGS. Lastly, Ms. Twigg claims that she provided KGS a confirmation number and amount paid, only to be told she needed an actual receipt instead.

BACKGROUND:

On June 7, 2024, Leah Twigg filed a formal complaint against KGS. Ms. Twigg claims that she received a letter from KGS explaining that she owed \$722.01 for gas service at a previous location. When Ms. Twigg spoke to a KGS customer service agent to find out what the charge was for, she was informed it was a credit for a previous payment. She then later received a bill for that exact amount. Ms. Twigg claims that she was told by KGS to provide a confirmation number, and the

¹ See Formal Complaint by Leah Twigg, June 7, 2024.

amount paid to back up the claim that the charge was actually a credit for a previous payment. At some point during her conversations with KGS, Ms. Twigg's gas service was shut off for non-payment, with KGS informing Ms. Twigg that she owed over \$1,200. Ms. Twigg also claims in the complaint that service at her previous address was not disconnected by KGS. Lastly, Ms. Twigg claims that she provided KGS a confirmation number and amount paid, only to be told she needed an actual receipt instead.

Ms. Twigg claims she was made aware of her old address receiving service still when talking with a Low-Income Energy Assistance Program (LIEAP) representative. Ms. Twigg explains that she was told the assistance was going to the previous address instead of the current one. This happened among the other calls and events.

On August 2, 2024, KGS filed a response. KGS stated that the crux of the complaint, the initial \$722.01 transaction, was communicated as a credit. However, this transaction was actually the transfer of a balance on a previous account of Ms. Twigg to a current account, reflected as a credit on one of the accounts and a debit on another. Also, KGS stated the previous account that was still active was at the request of Ms. Twigg herself on or around November 27, 2023. KGS affirmed Ms. Twigg's service was disconnected in April 2024 for non-payment. KGS apologizes for the way the transfer was communicated and the confusion that resulted. KGS also committed to work with the customer to provide additional payment plan and service restoration options. Lastly, KGS' response states that the balance transfers in question and fulfilling a customers' request to keep an account open are not violations of Kansas law, Commission order, or tariff.

KGS also specifically noted that, relevant to the balance transfer, are two of the previous customer accounts of Ms. Twigg. Both of the remaining balances at these two older addresses were transferred to the most current address in November 2023 in accordance with the Commission's Electric, Natural Gas and Water Billing Standards.²

ANALYSIS:

Staff reviewed the phone conversations between Ms. Twigg and the KGS customer service representatives and found that Ms. Twigg did in fact request service at her previous address to continue, as she was in the process of changing residences and had not yet finished. Also, although KGS has stated why the initial transfer was miscommunicated, the company did try multiple times to explain to Ms. Twigg what actually happened with that balance.³ Staff listened to all calls provided by KGS pertaining to discussions between Ms. Twigg and KGS, and could not find an instance of Ms. Twigg providing confirmation numbers for payment amounts. Accordingly, Staff is able to support a finding that the way the bills were presented was correct.

RECOMMENDATION:

Staff has reviewed the complaints of Leah Twigg, the responses of KGS, and the various information and exhibits submitted by both Ms. Twigg and KGS. While sympathetic to the situation and circumstances Ms. Twigg finds herself in, based on the information available, Staff is not able to conclude that KGS has violated any tariff, law, or Commission Order. While the

² See Electrical, Natural Gas and Water Billing Standards §IV.B.(2)

³ See Response to Staff Data Request No. 1

balance transfer was miscommunicated over the phone, the bills did show the information correctly. Also, though the service was not shut off at the previous address of Ms. Twigg, it was at her request that it remain active. Staff recommends that the Commission dismiss the complaint in its entirety.

CERTIFICATE OF SERVICE

24-KGSG-837-COM

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing of Staff's Report and Recommendation was served via electronic service this 20th day of November, 2024, to the following:

AARON BAILEY, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
aaron.bailey@ks.gov

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
brian.fedotin@ks.gov

CARLY MASENTHIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
carly.masenthin@ks.gov

JANET BUCHANAN, DIRECTOR OF RATES &
REGULATORY
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.
7421 W 129TH STREET
OVERLAND PARK, KS 66213
janet.buchanan@onegas.com

ROBERT E. VINCENT, MANAGING ATTORNEY
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.
7421 W. 129TH STREET
OVERLAND PARK, KS 66213
robert.vincent@onegas.com

LEAH TWIGG
1816 W. BURTON ST.
WICHITA, KS 67213
leahtwigg1122@gmail.com

Ann Murphy

Ann Murphy