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August 12, 2019

VIA ELECTRONIC TRANSMISSION & FEDERAL EXPRESS

Ms. Lynn Retz
Secretary to Commission
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604

Re: In the Matter of the Complaint of Kansas Gas Service, a Division of ONE Gas, Inc.,
Against Westar Energy, Inc., Regarding Westar's Practice of Offering Payments to
Developers in Exchange for the Developers Designing All Electric Subdivisions.

Docket Number 19-WSEE-061-COM

Dear Ms. Retz:

Enclosed please find the *Rebuttal Testimony for Lyn Leet* for filing in the above-referenced matter. Please feel free to contact me with any questions or concerns regarding this filing.

Sincerely,

Judy Jenkins Hitchye
Judy Jenkins Hitchye

JH/sef
Encl.

cc: Attorneys of Record
Michael Duenes

REBUTTAL AND RESPONSIVE TESTIMONY

OF

LYN S. LEET

ON BEHALF OF KANSAS GAS SERVICE,

A DIVISION OF ONE GAS, INC.

REBUTTAL AND RESPONSIVE TESTIMONY

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ON BEHALF OF KANSAS GAS SERVICE,

A DIVISION OF ONE GAS, INC.

1 **I. Introduction**

2 **Q. Please state your name and business address.**

3 A. My name is Lyn Leet, and my business address is 7421 W. 129th St., Overland Park,
4 KS 66313.

5 **Q. By whom are you in employed and in what capacity?**

6 A. I am the Manager of Customer Development for Kansas Gas Service ("KGS" or the
7 "Company"), which is a division of ONE Gas, Inc., ("One Gas").

8 **Q. Did you file direct testimony in this docket?**

9 A. Yes, I did.

10 **Q. Was this responsive and rebuttal testimony prepared by you or under your**
11 **direct supervision?**

12 A. Yes, it was.

13 **Q. What is the purpose of your testimony?**

1 A. The purpose of my testimony is to respond to the testimony of KCC's witness, Mr.
2 Justin Prentiss and the testimony of Westar witness, Ms. Rebecca Fowler.

3 **II. Cost Comparison of Gas vs. Electricity**

4 **Q. In her testimony, challenging your comparison of the cost of gas versus**
5 **electricity, Ms. Fowler alleges the results of your comparison of the cost of gas**
6 **versus electricity is inaccurate. How do you respond?**

7 A. I did not attempt to recreate or otherwise test the results of Ms. Fowler's
8 hypothetical calculation used in her testimony to challenge the accuracy of the
9 energy costs comparison I presented in my Direct Testimony. Instead, I point to
10 Ms. Fowler's acknowledgment that all-electric "customers are currently paying a
11 13% premium for a total electric home with a 3.0 Coefficient of Performance
12 ("COP") heat pump" when compared to a gas furnace.¹ This acknowledgement is
13 made even after Ms. Fowler adjusted her calculation to reflect the:

- 14 1. Deduction of costs associated with avoiding payment of Kansas Gas
15 Service's monthly service charge (\$18.70 per month);
- 16 2. Reduction of the average rate (cost) for kWh usage, to the rate (cost) for
17 usage greater than 900 kWh;
- 18 3. Usage of the winter rate; and

¹ See, Direct Testimony of Rebecca Fowler, page 8, lines 12 and 13.

1 4. Adjustment to reflect a natural gas furnace efficiency, which is the average
2 of an 80% to 90% efficient furnace.²

3 Ms. Fowler acknowledges that the results of Westar's own analysis are consistent
4 with Kansas Gas Service's position. This supports the Company's argument that
5 Westar's practice is not beneficial for customers and is not in the public interest.

6 **Q. Have you reviewed KCC witness Mr. Justin Prentiss's testimony filed in this**
7 **docket?**

8 **A. Yes, I have.**

9 **Q. Do you have any concerns regarding Mr. Prentiss's testimony?**

10 **A. No. I found Mr. Prentiss's testimony to be fair and concise and easy to follow.**

11 **Q. What were the results of Mr. Prentiss's analysis?**

12 **A. The results of Mr. Prentiss's analysis are that all electric energy users pay higher**
13 costs (rates) than those customers who have the option to install natural gas for
14 heating units in their homes.

15 **Q. Do you agree with Mr. Prentiss's analysis?**

16 **A. Yes, Mr. Prentiss's analysis is consistent with the results discussed in both my**
17 Direct Testimony and the Direct Testimony of Ms. Fowler.

18 **v. Conclusion**

19 **Q. Does this conclude your testimony?**

² *Id.* at Exhibit RF-2.

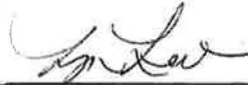
1

A. Yes, it does.

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF JOHNSON)

Lyn Leet, being duly sworn upon her oath, deposes and states that she is the Manager of Commercial Projects for Kansas Gas Service, a Division of ONE Gas, Inc.; that she has read and is familiar with the foregoing Testimony filed herewith; and that the statements made therein are true to the best of her knowledge, information, and belief.



Lyn Leet

SUBSCRIBED AND SWORN to before me this 12th day of August, 2019.



Notary Public

Commission/Appointment Expires: 06/05/22



CERTIFICATE OF SERVICE

I, Judy Jenkins Hitchye, hereby certify that a copy of the above and foregoing *Rebuttal Testimony for Lyn Leet* was forwarded this 12th day of August, 2019, addressed to:

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