

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

In the Matter of the Investigation into Kansas)
Gas Service Company, a Division of One Gas)
Inc. Regarding the February 2021 Winter) Docket No. 21-KGSG-332-GIG
Weather Events, as Contemplated by Docket)
No. 21-GIMX-303-MIS.)

**REPLY OF THE NATURAL GAS TRANSPORTATION CUSTOMER COALITION
TO THE OBJECTION OF KANSAS GAS SERVICE**

COMES NOW the Natural Gas Transportation Customer Coalition (“NGTCC”) and files herein with the State Corporation Commission of the state of Kansas (“KCC” or “Commission”), its reply to the objection of Kansas Gas Service (KGS) dated August 23, 2021, regarding the motion of NGTCC to make public the KGS response to KCC Staff Information Request 21-322-KCC-030 to-wit:

Please provide the following: 1. In January 2021, what was the estimated usage for Kansas Gas Service’s sales customers (non-Transportation customers) for the month of February 2021? What was the actual usage for Kansas Gas Service’s sales customers (non-Transportation customers) for the month of February 2021?

1. KGS in its Objection - Paragraph Nos. 2-8, seems to be critical of NGTCC for filing Motions to place before the Commission issues of whether documents designated by KGS as confidential, may remain confidential and exempt from public view, or whether those described documents should appropriately be determined by the Commission to be public in nature based on applicable Kansas law. NGTCC makes no apology to KGS for bringing these issues before the Commission for consideration – it is precisely the procedure set forth by the Commission in its Protective Order issued in this case.

2. All documents presented to the Commission in any form are presumed to be public unless an appropriate designation is made to exempt such documents from public disclosure. In this case, wherein KGS seeks to recover \$451 million from Kansas ratepayers - - approximately 79% from residential ratepayers and approximately 9% from small commercial / small business ratepayers - - the issue of public transparency is paramount. In fact, it is the responsibility of all parties and their counsel in this Docket to bring these issues of public access and public transparency before the Commission for determination.

3. The document in question is a simple, single page document as described above, and is attached hereto as Confidential Exhibit No. 1. There is no customer information provided, there is no strategy involved. It is simply a summary listing on a day-by-day basis in February 2021, which sets forth on a total KGS basis, (1) the amount of natural gas delivered by KGS, and of that amount, (2) what volume was delivered for sales customers and (3) what volume was delivered for transportation customers. (Confidential Exhibit 1 and Confidential Exhibit 2).

4. This document speaks directly to several important issues in this case including the amount of natural gas transportation during the period of Disaster declared by Governor Kelly. Perhaps more importantly, the document speaks to the effect of conservation appeals and demand response, requested by the Governor and the Commission beginning on February 14, 2021.

5. The document demonstrates that the appeal for conservation made by the Governor and the Commission, was very successful. The Governor and the Commission were on television and appeared throughout media in the state of Kansas on February 14, 2021. The Commission issued its Emergency Order on February 15, 2021. Total volume used on the KGS system

**, ** in material amounts each day thereafter, for the period February 14 through

February 18 (the days of highest prices as reported by Platts Gas Daily Index for Southern Star Pipeline).

6. Sales gas volumes in the period February 14, through February 18 **.

** and transport volumes **. In the period February 8 - - when potential high prices began to be discussed prominently in the media - - through February 18 - - a period of 10 days - - **.

7. The public conservation efforts of the Governor and the Commission were highly successful and are to be commended, as they clearly mitigated and moderated the amount of additional natural gas costs that would otherwise burden retail ratepayers of KGS.

8. It may be instructive for future, possible extreme weather events, that the Commission carefully consider the benefits that could inure to ratepayers by even earlier warnings and public appeals for conservation.

9. We can and should learn and benefit from the experience of conservation and demand response to both supply and cost issues of electric and natural gas as initiated and directed by the Commission, and as may be appropriate, the Governor of Kansas.

Respectfully submitted,

/s/ James P. Zakoura

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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

James P. Zakoura, being duly sworn upon his oath, deposes and states that he is the Attorney for the Natural Gas Transportation Customer Coalition, that he has read and is familiar with the foregoing *Reply of the Natural Gas Transportation Customer Coalition to the Objection of Kansas Gas Service*, and that the statements therein are true to the best of his knowledge, information, and belief.


James P. Zakoura

SUBSCRIBED AND SWORN to before me this 25th day of August 2021.


Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of August 2021, the foregoing *Reply of the Natural Gas Transportation Customer Coalition to the Objection of Kansas Gas Service* was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

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/s/ James P. Zakoura

James P. Zakoura

CONFIDENTIAL

EXHIBIT NO. 1

CONFIDENTIAL

EXHIBIT NO. 2