

June 27, 2025

1 **I. Introduction, Qualifications, and Purpose of Testimony**

2 **Q. What is your name?**

3 A. My name is Douglas W. Hall.

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

5 A. I am employed by the Kansas Corporation Commission (“KCC” or “Commission”)
6 as a Senior Rate Analyst in the Audit Section within the Utilities Division.

7 **Q. What is your business address?**

8 A. 1500 S.W. Arrowhead Road, Topeka, Kansas, 66604-4027.

9 **Q. What is your educational background and professional experience?**

10 A. I hold a bachelor’s degree in both Economics and Mathematics from Colorado State
11 University. I began my career at the KCC as a Research Economist in October of
12 2019. I became a Rate Analyst with the KCC in August 2020, and have been a
13 Senior Rate Analyst since November 2022.

14 **Q. Have you previously submitted testimony before this Commission?**

15 A. Yes, I have submitted testimony in Docket Nos. 20-SPEE-169-RTS, 22-EKME-
16 254-TAR, 23-EKCE-775-RTS, and 25-EKCE-294-RTS. I have also contributed
17 substantively to several Report and Recommendations as a member of Commission
18 Staff in other dockets.

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

20 A. The purpose of my testimony is to provide Staff’s response to the proposal of
21 Southern Pioneer Electric Company (“Southern Pioneer” or “Utility”) to make
22 changes to its Rules and Regulations Tariff which are supported by Southern
23 Pioneer witnesses Brian Beecher and Chantry Scott.

1 **Q. Please provide an executive summary of your testimony.**

2 A. Throughout this testimony, I will present and support the conclusion that while
3 many of the proposed changes to Southern Pioneer’s Rules and Regulations are
4 acceptable and should be approved, there are several proposed changes which are
5 problematic and should be denied by the Commission. In my testimony, I will
6 explain Staff’s specific rationale for our objections to Southern Pioneer’s proposals.

7 **II. Proposed Changes to Rules and Regulations**

8 **Q. What is Staff’s position on Southern Pioneer’s proposed tariff changes?**

9 A. Many of the tariff changes proposed by Southern Pioneer are acceptable to Staff
10 without any edits or adjustments or require only a minor change to spelling or
11 grammar. Because there are so many proposed changes, any such minor edits will
12 be listed in Appendix A. There are a few proposed changes with which Staff
13 disagrees, as discussed in more detail below.

14 **Index No. 3 (“R3”)**

15 **Q. Which proposed changes does Staff disagree with?**

16 A. The first change that Staff objects to is Index No. 3 (“R3”), Section A.2.b, the
17 redlined version of which reads as follows:

18 ~~Residential~~eCustomers who have been disconnected and
19 reconnected to service at the same premise within ~~30~~5 days
20 shall be considered existing customers. Any Residential
21 customers who has~~have~~ been lawfully disconnected for over
22 ~~30~~5 days may be considered a new applicants.

23 This paragraph describes conditions under which a customer that has been
24 disconnected and reconnected to service is considered a new customer. The
25 proposed changes reduce the number of days a customer can be disconnected before

1 no longer being considered an existing customer. However, the Commission's
2 Electric, Natural Gas and Water Billing Standards ("Billing Standards"), Section
3 III.A.2.b sets the window for disconnecting and reconnecting service while
4 retaining status as an existing customer at 30 days.

5 **Q. Are there circumstances under which the Rules and Regulations Tariff can**
6 **differ from the Commission's Billing Standards?**

7 A. Yes, Section VI of the Billing Standards allow that requirements "may be waived
8 in individual cases by the Commission upon written request by the utility and a
9 showing that compliance with the requirement would not serve the interests of
10 either the utility or the customer." For this proposed change, and for the others that
11 will be discussed below, Southern Pioneer has neither specifically requested a
12 waiver of the Billing Standards, nor provided reasoning why the original tariff is
13 not serving the interests of the Utility or its customers. Southern Pioneer has not
14 provided evidence that a waiver is warranted.

15 **Q. Please continue with the next proposed change.**

16 A. Southern Pioneer also proposes removing R3, Section A.2.c, the redlined version
17 of which reads as follows:

18 ~~Nonresidential customers who have been disconnected, but~~
19 ~~not issued a final bill, shall be considered existing customers.~~
20 ~~Nonresidential customers who have been lawfully~~
21 ~~disconnected and issued a final bill may be considered new~~
22 ~~applicants.~~

23 This paragraph currently states that nonresidential customers that have been
24 disconnected but have not been issued a final bill are considered existing customers.
25 Nonresidential customers that have been lawfully disconnected and have been
26 issued a final bill can be considered new customers for the purposes of requiring

1 applications and initial security deposits. This paragraph mirrors Section III.A.2.c
2 from the Billing Standards. The proposed change in R3, Section A.2.c would apply
3 a blanket definition of existing customer to all nonresidential customers, including
4 those that may have been disconnected but not yet issued a final bill, contradicting
5 the Billing Standards.

6 In addition to being inconsistent with the Billing Standards, it is further worth
7 noting that being classified as a new customer as opposed to an existing customer
8 can pose additional hurdles to reconnecting service, such as deposit requirements.
9 Thus, customers suffering from financial hardship would be disproportionately
10 affected by the proposed changes. Therefore, Staff recommends that the
11 Commission reject Southern Pioneer's proposed changes to R3, Sections A.2.b and
12 A.2.

13 **Q. Are there other changes to which Staff objects?**

14 A. The next change that Staff finds issue with is R3, Section B. This provision lists
15 one of the conditions under which Southern Pioneer can require a deposit. The
16 redlined version reads as follows:

17 B. The Company may at any time after application for
18 service, upon five (5) days written notice, require a new or
19 modified deposit to guarantee payment of bills for utility
20 service rendered if:

21 (1) The Customer fails to pay an undisputed bill before the
22 bill due date for three (3) ~~consecutive~~ consecutive billing periods during
23 the previous 12 months, one of which is at least 30 days in
24 arrears ~~the first day of the arrearage period is the first day~~
25 ~~after the due date on the bill;~~

26 ...

1 (3) The customer was disconnected for non-payment ~~two or~~
2 ~~more times within the most recent twelve month period;~~

3 ...

4 (7) The Company establishes that the Customer is a financial
5 risk to the Company or cannot demonstrate adequate
6 assurance of future payment

7 Paragraphs (1) and (3) as originally written are taken verbatim from Section
8 III.B.(1) and (3) of the Billing Standards, “Standards on Security Deposit Practice”.
9 Removing or changing specific criteria from the Billing Standards would contradict
10 the Billing Standards. For example, in paragraph (1) of Southern Pioneer’s
11 proposed changes, the combination of the removal of the word “consecutive” and
12 the requirement of a 30-day arrearage means that a customer that pays bills late
13 three times within the past year could be required to pay a deposit, whereas this
14 would not occur under the text of the Billing Standards.

15 The proposed change to paragraph (3) removes any temporal constraint from
16 the deposit requirement. A customer that was disconnected twice for non-payment,
17 mostly recently last month, and previously years ago, could find themselves being
18 required to make a deposit for guarantee of service. In addition to departing from
19 the Billing Standards, Staff views this as unnecessarily punitive.

20 With respect to paragraph (7), Staff understands and appreciates a utility’s need
21 to mitigate some of the financial risk of serving customers that have demonstrated
22 an inability or unwillingness to pay bills consistently and on time. However, the
23 Billing Standards set forth clear limits on when a deposit can be required from a
24 customer, whereas the proposed language is vague. The problem as Staff sees it
25 here is twofold. A customer reading the Rules and Regulations would be unlikely

1 to gain a clear understanding of what constitutes a financial risk by using that phrase
2 alone. The Billing Standards already address requiring a deposit for a customer in
3 cases of delinquency vis-a-vis disconnection for nonpayment, customers that
4 declare bankruptcy, or that have an unsatisfactory credit rating. Staff notes that the
5 Billing Standards do not specify what an unsatisfactory credit rating would be in
6 quantitative terms, but this language would be preferred, provided that internal
7 company rules specify what level is unsatisfactory. The second issue is the
8 potential for inconsistency in the application of this provision. In the absence of
9 specified criteria for determining whether a customer presents a financial risk to the
10 utility, the possibility exists that two different customers with practically identical
11 financial profiles would receive different deposit requirements. Staff recommends
12 the Commission reject the proposed changes.

13 **Q. Please continue.**

14 **A.** In R3, Section B.6 (which should be renumbered B.8) states the following:

15 The customer has sought debt restructuring relief under
16 federal bankruptcy laws. Within 60 days after the
17 bankruptcy has been discharged, if the deposit on file is less
18 than the maximum security deposit requirement for the same
19 premise, the utility may recalculate the customer's security
20 deposit based on the most recent twelve months' of usage or
21 the projected usage, whichever is larger.

22 The language of Section B.6 is taken verbatim from Section III.B.6 of the
23 Billing Standards, except for adding projected usage as a possible basis for the
24 recalculation. Because projected usage is not included in the Billing Standards, and
25 because Section III of the Billing Standards does not otherwise provide latitude in

1 determining how deposits are calculated, the proposed change to R3 Section B.6
2 should be rejected.

3 **Index No. 4 (“R4”)**

4 **Q. What other concerns does Staff have regarding the proposed changes?**

5 A. There are a few changes in Index No. 4 (“R4”) with which Staff raises an objection.

6 The first is Section A.13.a, which reads as follows in redline:

7 The Bill shall also show any adjustment to previous billings.
8 ~~based on estimated usage or customer meter readings. The~~
9 ~~adjustment shall be made after actual usage has been~~
10 ~~determined by a meter reading by the Company, pursuant to~~
11 ~~Section IX, P, (2), Index Number R9, Sheet 7, and Section~~
12 ~~IX, N, Index Number R9, Sheet 5R4 C. The adjustment shall~~
13 ~~be calculated for the period between the prior and the most~~
14 ~~recent meter reading by the Company. If the adjustment~~
15 ~~shows a net balance due to the Company, the customer shall~~
16 ~~be given the opportunity, if requested, to pay the additional~~
17 ~~charges in equal installments over a period of time equal to~~
18 ~~the adjusted billing period. If a net balance is due to the~~
19 ~~customer, the customer shall be given either a credit on~~
20 ~~subsequent bills pursuant to Section IX, P (2), Index Number~~
21 ~~R9, Sheet 7, and Section IX, N, Index Number R9, Sheet 5,~~
22 ~~or a refund, if the overpayment exceeded \$10 and a refund is~~
23 ~~requested.~~

24 The entirety of Section A addresses what is to be shown on each bill issued to
25 a customer, and A.13.a currently states that any adjustments based on estimated
26 usage or customer meter readings will be shown on the bill. The proposed change
27 removes all references to estimated usage or customer meter readings and simply
28 states that the bill will show any adjustments. Staff recommends that the proposed
29 deletion be offset as a conditional case. A red-lined example is:

30 The Bill shall also show any adjustment to previous billings.
31 If an adjustment is based on estimated usage or customer
32 meter readings, ~~the~~ adjustment shall be made after actual
33 usage has been determined by a meter reading by the

1 Company. pursuant to Section IX, P, (2), Index Number R9,
2 Sheet 7, and Section IX, N, Index Number R9, Sheet 5R4 C.
3 The adjustment shall be calculated for the period between
4 the prior and the most recent meter reading by the Company.
5 If the adjustment shows a net balance due to the Company,
6 the customer shall be given the opportunity, if requested, to
7 pay the additional charges in equal installments over a period
8 of time equal to the adjusted billing period. If a net balance
9 is due to the customer, the customer shall be given either a
10 credit on subsequent bills pursuant to Section IX, P (2),
11 Index Number R9, Sheet 7, and Section IX, N, Index
12 Number R9, Sheet 5, or a refund, if the overpayment
13 exceeded \$10 and a refund is requested.

14
15 This would allow the language of A.13 to apply generally to all adjustments
16 while providing clarity regarding the particular instances involving some form of
17 usage or billing estimation.

18 **Q. What is Staff's next concern with proposed changes to R4?**

19 A. Next, there are proposed changes in R4, Section E, "Standards on Delayed Payment
20 Charges" which are problematic. Southern Pioneer proposes a change to Section
21 E.1 to remove subparagraphs (a) and (b), both of which establish the due date that
22 appears on a customer's bill, thus indicating the time at which a bill becomes
23 delinquent. The proposed changes, including a lead-in from the previous
24 paragraph, read as follows:

25 1) A bill shall be deemed delinquent if payment thereof is
26 not received by the Company or its authorized agent on or
27 before the date stated on the bill which date shall be;

28 ~~a. For residential customers, the last date on which~~
29 ~~payments received can, in the normal and reasonable~~
30 ~~course of the Company's procedures, be credited to~~
31 ~~the customer's account in preparing his next normal~~
32 ~~billing.~~

1 ~~b. For all other customers, the fifteenth (15th) day~~
2 ~~after date of billing.~~

3 2) Penalties will be assessed on the 20th day after the date of
4 billing. When a bill becomes a delinquent; a late payment
5 charge in an amount equal to two percent (2%) of the
6 delinquent amount owed for current utility service will be
7 added to the customer's bill, and any collection efforts by the
8 Company shall be initiated.

9 The language in subparagraphs (a) and (b) is taken from the Billing Standards
10 Section II.A, subparagraphs (1) and (2). Staff disagrees with the removal of
11 subparagraphs (a) of Southern Pioneer's Section E.1. Staff appreciates the intent
12 that residential and non-residential customers are to be treated equally with respect
13 to delinquency, however, the Billing Standards clearly set a different standard for
14 residential customers. Staff has no objection to the assessment of penalties on the
15 20th day after the date of billing for nonresidential customers, as this standard is
16 more lenient than the Billing Standards.

17 **Q. Does Staff have a concern with changes to R4 Section E. 4?**

18 A. Yes. Another proposed change made by Southern Pioneer is the removal of Section
19 E.4, regarding an option for non-residential customers to have bills sent to two
20 locations, and also the ability to request an extension at the cost of a late fee. The
21 paragraph reads as follows:

22 ~~4) If a nonresidential customer is consistently unable to pay~~
23 ~~its bills on time due to bill paying procedures, the Company~~
24 ~~shall offer to mail a copy of the bills to the customer's bill~~
25 ~~paying office at the same time it is delivered to the local~~
26 ~~business. If the customer chooses, the Company shall offer~~
27 ~~the customer the option of paying a one percent (1%) late fee~~
28 ~~every month for a time extension of 14 days. The Company~~
29 ~~may discontinue this option for the customer after the~~

1 ~~customer requests it or the customer fails to pay the bill~~
2 ~~within the 29 days established by this provision.~~

3 The language in Section E.4 mirrors that of Section II.D of the Billing
4 Standards. Staff objects to the proposed change, because its removal would lead to
5 a Rules and Regulations Tariff which no longer conforms to the Billing Standards,
6 and because Southern Pioneer does not meet the requirements set forth by Section
7 VI of the Billing Standards, “showing that compliance with the requirement would
8 not serve the interests of either the utility or the customers.”

9 **Q. Are there any other proposed changes to R4 that Staff wishes to comment on?**
10 A. Yes, as proposed, Sections H.4 and H.5 would only allow residential customers or
11 customers taking single-phase service to make payments using a credit card. These
12 paragraphs read as follows:

13 4) Pay On-Line: Payment may be made on-line with an e-
14 Check, credit or debit cards using the Company's authorized
15 third- party vendor payment portals (SmartHub, and Mobile
16 E-bill-and PayNow, etc.); provided, however payment by
17 credit card may only be made by a residential customer or a
18 customer taking single-phase service.

19 5) Pay By Phone: Payment may be made by phone with an
20 e-Check, credit or debit card using the Company's authorized
21 secure third--party vendor provided, however payment by
22 credit card may only be made by a residential customer or a
23 customer taking single-phase service.. Payment by this
24 method is accessible through the Company's toll free
25 customer service phone number.

26 In Docket 25-SPEE-307-MIS (“25-307 Docket”), Southern Pioneer filed an
27 Application requesting a waiver from its Rules and Regulations that would disallow
28 credit cards as a payment option for sub-transmission and transmission service

1 (“STR”) customers.¹ The waiver is requested for relief from excessive merchant
2 fees, and is supported by the testimony of Mr. Chantry C. Scott. Southern Pioneer
3 indicated in its application that they would propose changes to its Rules and
4 Regulations at a later time as a permanent solution. The proposed changes to
5 Sections H.4 and H.5 are the follow-up to the 25-307 Docket. While that docket is
6 still open, the information on record indicates that the merchant fees incurred by
7 STR customers are high enough to raise concerns about their impact on the Utility
8 as well as other customers. Therefore, Staff recommends that the proposed changes
9 to Sections H.4 and H.5 of R4 be accepted.

10 **Index No. 5 (“R5”)**

11 **Q. Please continue.**

12 A. The next change that Staff finds issue with is the edit to Index No. 5 (“R5”), Section
13 C.i.6, that reads as follows:

14 ~~6) The notice(s) required by Section V, C, Sheet 3, above,~~
15 ~~shall contain the following information:~~

16 ~~a. The name and address of the customer and the address, if~~
17 ~~different, where service is rendered.~~

18 ~~b. A clear and concise statement of the reason for the~~
19 ~~proposed discontinuance of service and the cost and~~
20 ~~conditions for reconnection.~~

21 ~~c. The dates between which service can be discontinued~~
22 ~~unless the customer takes appropriate action.~~

23 ~~d. Terms under which the customer may avoid~~
24 ~~discontinuance.~~

¹ Application for Waiver from Tariff Provision and Request for Expedited Review and Relief, p. 3, Docket 25-SPEE-307-MIS (Feb. 3, 2025).

1 ~~e. A statement that discontinuance may be postponed or~~
2 ~~avoided if a customer can demonstrate that special~~
3 ~~circumstances prevent complete payment and satisfactory~~
4 ~~credit arrangements are made with the utility for moneys not~~
5 ~~in dispute.~~

6 ~~f. A statement reasonably calculated to apprise the customer~~
7 ~~of the availability of an administrative procedure which may~~
8 ~~be utilized in the event of a bona fide dispute or under other~~
9 ~~circumstances, such as provided in Section V, B, Sheet 3,~~
10 ~~above. The address, telephone number and name of the~~
11 ~~Company office or personnel empowered to review disputed~~
12 ~~bills, rectify errors, and prevent disconnection shall be~~
13 ~~clearly set forth. The notice shall state that the customer may~~
14 ~~meet with a designated employee of the Company and may~~
15 ~~present his or her reasons for disputing a bill or the~~
16 ~~Company's reasons for discontinuance, requesting credit~~
17 ~~arrangements or requesting a postponement of~~
18 ~~discontinuance.~~

19 This section describes the information to be contained within a notice of
20 discontinuance of service. Such a notice would be sent to a customer in advance
21 of disconnection for nonpayment. The text of Section C.i.6 is taken almost
22 verbatim from the Billing Standards, Section IV.E. If a disconnection notice does
23 not include the information specified in Section IV.E of the Billing Standards, it
24 would be a violation of these standards. Staff objects to the removal of R5, Section
25 C.i.6 from Southern Pioneer's tariffs because it would no longer conform to the
26 Billing Standards, and because customers reading through the tariffs should be able
27 to clearly understand what information they can expect to see on a disconnection
28 notice.

29 If it is Southern Pioneer's intention not to provide this information on notices
30 of disconnection, it should file a separate Application requesting a waiver to the
31 Billing Standards. On the other hand, if the goal is to simply streamline the tariffs

1 while still adhering to the Billing Standards and providing all required information
2 to customers on a notice of disconnection, this raises an issue of transparency. It
3 should be the case that a customer reviewing the Utility's tariffs or regulations
4 understand the obligations and expectations of both the customer and the Utility.
5 This includes what information will be provided on any correspondence, whether
6 that is a bill, or a notice of disconnection. For these reasons, Staff believes that
7 Section C.6 should be retained and not removed from Southern Pioneer's tariffs.

8 **Q. Are there any other changes to which Staff objects?**

9 A. Yes. Staff objects to a few changes regarding notification of customers with AMI
10 meters of pending disconnection for nonpayment. The first such proposed change
11 is the removal of Section C.ii.4, which reads as follows:

12 ~~4) Five to seven (5-7) days prior to disconnection, the~~
13 ~~Company shall attempt to contact the Customer via the~~
14 ~~Customer's preferred choice informing the Customer of the~~
15 ~~Company's intent to disconnect.~~

16 Section C.ii.6, also proposed for removal, reads as follows:

17 ~~6) One (1) day prior to disconnection, the Company shall~~
18 ~~attempt to contact the Customer via a preferred choice,~~
19 ~~informing the Customer of the Company's intent to~~
20 ~~disconnect.~~

21 These notices were introduced in Docket No. 15-GIMG-344-GIV ("15-344
22 Docket"), which opened a general investigation into the appropriateness of a waiver
23 of the knock and collect provisions of the Billing Standards. The additional notices
24 were incorporated into a pilot program as an alternative to the knock and collect

1 procedure.² While the additional notices are not explicitly required by the Order
2 approving the knock and collect waiver, they were a key element of the pilot
3 program. Staff noted in its Report and Recommendation that Southern Pioneer's
4 data showed the five-day notice encouraged payment prior to disconnection.³

5 Although the additional notices are not explicitly required, the pilot program
6 demonstrated that they have a positive effect, and played a role in Staff's reasoning
7 for recommending approval of the knock and collect waiver. In the absence of an
8 alternative to the five-day and two-day notices, Staff recommends that Sections
9 C.ii.4 and C.ii.6 be retained.

10 **Index No. 10 ("R10")**

11 **Q. Are there any other proposed changes to which Staff objects?**

12 A. Yes, Section 10 is titled "Parallel Generation Interconnection Regulations",
13 detailing rules and regulations for any customer seeking to connect their own
14 generation facilities to and run parallel with Southern Pioneer's distribution system.
15 Requirements set forth in this section include that the customer must file an
16 Application for Interconnection and Parallel Operation with the Company's
17 Distribution System ("Application") and agree to the Utility's Small Generator
18 Interconnection Procedures ("SGIP"). Southern Pioneer's proposed changes would
19 remove both the Application and the SGIP from R10. Mr. Beecher states in his
20 testimony that Southern Pioneer intends to introduce a new parallel generation

² See Joint Motion to Approve Temporary Waiver, p. 3, Docket 15-GIMG-334-GIV (15-344) (Mar. 7, 2017).

³ See Notice of Filing of Staff's Report and Recommendation, p. 11, Docket 15-344 (Dec. 15, 2020).

1 tariff, with the Application and SGIP moved from the Rules and Regulations either
2 into the new tariff, or onto the website.

3 If Southern Pioneer wishes to file an application for a new parallel generation
4 tariff, any modifications to R10 should be handled in the future docket. It is
5 generally the case that old versions of tariffs or regulations are not removed before
6 future revisions are filed. This avoids any ambiguity or discrepancy during the gap
7 between the deletion of the old and the implementation of the new tariff. Staff
8 recommends that no changes be made to R10 at this time, and that the proposed
9 changes be resubmitted with Southern Pioneer's future application for a new
10 parallel generation tariff.

11 **III. Conclusion**

12 **Recommendation**

13 **Q. Please summarize Staff's recommendations.**

14 A. For R3, Staff recommends that Sections A.2.b and A.2.c should not be changed so
15 as to remain consistent with the Billing Standards. Also, Section B.7 should be
16 rewritten to clearly define criteria for why a customer would be considered a
17 financial risk to the Utility. Lastly, the proposed change to Section B.6 should be
18 rejected, as the added language would unjustifiably depart from the Billing
19 Standards.

20 For R4, Staff recommends the proposed deletion from Section A.13.a instead
21 be revised to indicate what regulations are followed when an adjustment is based
22 on an estimated meter reading. Additionally, Staff recommends that subparagraphs
23 (a) and (b) of Section E.1 not be removed, as these mirror to the Billing Standards.

1 For R5, Staff recommends that Section C.i.6 not be removed, as its removal
2 would contradict the Billing Standards. Additionally, elimination of Sections C.ii.4
3 and C.ii.6 would counter the rationale presented in Docket 15-344 that additional
4 communication attempts provide customers with a sufficient opportunity to avoid
5 disconnection for nonpayment. Therefore, Staff recommends that Sections C.ii.4
6 and C.ii.6 not be removed.

7 For R10, Staff recommends that the Application and SGIP for parallel
8 generation customers not be removed from the Rules and Regulations at this time.
9 Southern Pioneer has indicated that it intends to file a new parallel generation tariff
10 in the future; it would be appropriate to make all changes to Section 10 that mirror
11 what changes, if any, are adopted by the Commission at the conclusion of that
12 future docket.

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

14 **A. Yes. Thank you.**

UNSWORN DECLARATION UNDER PENALTY OF PERJURY

Under penalties of perjury, I declare that I am Douglas Hall of the Utilities Division of the Kansas Corporation Commission, that I have read and am familiar with the foregoing Direct Testimony, and that the statements contained herein are true and correct to the best of his knowledge, information and belief. Executed on 6/24/2025.



Douglas Hall
Rate Analyst
State Corporation Commission of the
State of Kansas

CERTIFICATE OF SERVICE

25-SPEE-353-TAR

I, the undersigned, certify that a true and correct copy of the above and foregoing Direct Testimony was served via electronic service this 24th day of June, 2025, to the following:

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