

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

MAY 09 2012

by
State Corporation Commission
of Kansas

In the Matter of the Application of Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy, for Approval of the Commission for Gas System Reliability Surcharge per K.S.A. 66-2201 through 66-2204.)
) Docket No. 12-BHCG-055-TAR
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)
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)

CURB'S RESPONSE TO MOTION OF BLACK HILLS ENERGY

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB"), and files this response to the Motion of Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy to extend by twelve (12) months the 60-month deadline for Gas System and Reliability Surcharge (GSRS) proceedings under K.S.A. 66-2203(b) and K.S.A. 66-2203(c), pursuant to K.S.A. 66-2203(d). In support of its response, CURB states as follows:

1. In its May 4, 2012 motion, Black Hills Energy requests the Commission issue an order extending the 60-month deadline as set forth in K.S.A. 66-2203(b) and K.S.A. 66-2203(c) by twelve months, and allowing Black Hills Energy to make its next GSRS Application filing with the Commission.

2. In response, CURB notes that the statute sections cited above require a natural gas utility with a GSRS to file a rate case no less often than every 60 months, unless the utility requests up to a twelve-month extension of the deadline. The Commission may grant the motion as it deems the extension reasonable or necessary. CURB has no objection to the Commission granting Black Hills Energy's motion for an extension.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'M. D.', written in a cursive style.

David Springe #15619
Niki Christopher #19311
C. Steven Rarrick #13127
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

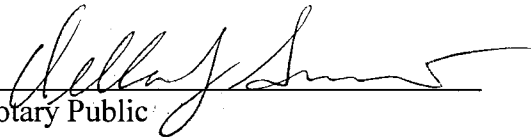
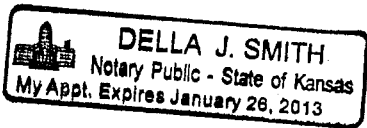
I, Niki Christopher, of lawful age, being first duly sworn upon her oath states:

That she is an attorney for the Citizens' Utility Ratepayer Board; that she has read the above, and foregoing document and upon information and belief, states that the matters therein appearing are true and correct.



Niki Christopher

SUBSCRIBED AND SWORN to before me this 9th day of May, 2012.


Notary Public

My Commission expires: 01-26-2013.

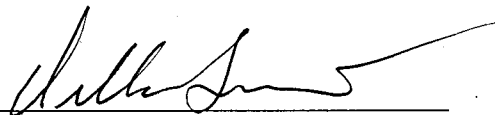
CERTIFICATE OF SERVICE

12-BHCG-055-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 9th day of May, 2012, to the following:

Judy Jenkins
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
Hand Delivered

James G. Flaherty, Attorney
Anderson & Byrd, LLP
216 S. Hickory
P.O. Box 17
Ottawa, KS 66067



Della Smith
Administrative Specialist