

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a General Investigation into)
the Appropriateness of Certain Sections of)
the Kansas Corporation Commission's) Docket No. 15-GIMX-344-GIV
Electric and Natural Gas Billing Standards)
(Billing Standards) Related to On-Premises)
Collections.)

CURB'S RECOMMENDATION REGARDING PILOT PROGRAM

COMES NOW the Citizens' Utility Ratepayer Board ("CURB") and files its final recommendation upon completion of the Pilot Program described below. CURB believes that the Kansas Corporation Commission ("Commission") should approve a permanent waiver from the requirements of Section IV, Item C (2); Section IV, Item G; and Section V, Item D (2) of the Kansas Corporation Commission's Billing Standards ("Billing Standards") as described below for Evergy Kansas Central, Inc. and Southern Pioneer ("the participating utilities"). In support of CURB's position, CURB states and alleges as follows.

BACKGROUND.

1. On February 26, 2015, the Commission issued an Order Adopting Staff's Report and Recommendation and Opening General Investigation, thereby opening a general investigation regarding the appropriateness and effects of eliminating the "knock and collect" requirement of the Commission's electric and natural gas billing standards prior to disconnection of utility service.¹ In particular, the Commission opened the general investigation to evaluate the appropriateness of Section IV, Item C (2); Section IV, Item G; and Section V, Item D (2) of the Commission's electric and natural gas billing standards related to on-premises collections.² In its

¹ Order Adopting Staff's Report and Recommendation and Opening General Investigation, ¶¶5-6 (Feb. 26, 2015)

² Id.

order, the Commission found that all Kansas gas and electric public utilities should be made parties to the proceeding.³ The Commission directed the parties to file comments on the most expeditious means by which the general investigation could proceed.⁴

2. On February 27, 2015, CURB filed a Petition to Intervene and Motion for Protective Order and Discovery Order in this docket.⁵ The Commission granted CURB's petition on March 10, 2015.⁶ CURB filed recommendations regarding the investigation procedures on April 13, 2015,⁷ as did several other parties.

3. On November 17, 2015, the Commission issued an Order on Procedural Schedule and Certifying Questions to the Parties.⁸ In that order, the Commission reviewed the various comments of the parties and encouraged the parties to hold discussions in whichever format the parties agreed was most accommodating, but directed the parties to address additional procedural questions, including whether hearings were necessary to resolve the docket.⁹ The Commission further directed the utility parties to address a number of questions by December 18, 2015, including the number of knock and collects conducted within various timeframes, whether there are any fees associated with various forms of payment, and how customers are specifically notified before and during the steps leading to shut-off.¹⁰ The Commission also directed Staff to file its Report and Recommendation outlining a procedural schedule to resolve the docket.¹¹

3 id.

4 id.

5 Petition to Intervene and Motion for Protection Order and Discovery Order (March 10, 2015)

6 Discovery and Protective Order; Order Designating Prehearing Officer; Order Granting The Citizens' Utility Ratepayer Board's Petition to Intervene (March 10, 2015)

7 CURB's Recommendations Regarding Investigation Procedures (April 13, 2015)

8 Order on Procedural Schedule and Certifying Questions to the Parties (November 17, 2015)

9 id.

10 id.

11 id.

4. The parties timely filed responses to the questions posed by the Commission in its November 17, 2015 order, and the Commission staff filed its required Report and Recommendation (“R&R”) on January 22, 2016.¹² In its January 22, 2016 R&R, Staff recommended that roundtable discussions be approved as providing sufficient information to form an acceptable policy recommendation, without requiring a formal hearing unless disagreements arise between the parties that could not be reconciled informally. Staff proposed a procedural schedule by which the docket could be resolved.¹³ This schedule entailed informal discovery and discussion among the parties to the end that a proposed amendment to the billing standards could be agreed upon by all parties. On February 11, 2016, the Commission adopted Staff’s January 22, 2016 R&R and ordered the parties promptly to begin implementing the proposed procedural schedule.¹⁴ Accordingly, Staff conducted an informal investigation with the Utility Parties.

5. On November 4, 2016, Staff filed an R&R with the Commission following that informal investigation.¹⁵ In that R&R, Staff recognized the potential for cost avoidance arising out of disconnection of utility services through Advanced Metering Infrastructure (“AMI”) meters, commonly referred to as smart meters, versus disconnection through the knock and collect requirement of the Billing Standards. However, Staff noted its concern as to how elimination of knock and collect would affect utility customers. Moreover, Staff was concerned that uneven deployment of AMI meters throughout Kansas would reasonably prevent an amendment to the pertinent billing standards. In these regards, Staff noted that only Evergy and Southern Pioneer had deployed sufficient AMI meters to warrant a change in the pertinent billing standards.

12 Notice of Filing Staff’s Report and Recommendation (January 22, 2016)

13 *id.*

14 Order Adopting Staff’s Report and Recommendation (February 11, 2016)

15 Notice of Filing Staff’s Report and Recommendation (November 4, 2016)

6. Therefore, in its November 4, 2016 R&R, Staff recommended that a temporary waiver of the billing standards be granted to the participating utilities so that a three-year pilot program could be implemented to gather information about the appropriateness and effects of eliminating the knock and collect requirement before utility service disconnection.¹⁶ Staff's proposal contained certain reporting requirements, customer notice requirements and limited the temporary waiver to periods not covered by the Cold Weather Rule ("CWR").¹⁷

7. On November 14, 2016, CURB filed responsive comments to Staff's November 4, 2016 R&R.¹⁸ In its responsive comments, CURB acknowledged that potential costs could be avoided by eliminating the knock and collect procedure prior to utility disconnection, but had concerns regarding eliminating the human contact (and last payment resort). CURB further acknowledged the lack of information concerning AMI metering and the issues presented in this docket. Upon these premises, CURB generally agreed with the November 4, 2016 R&R. CURB suggested that the Pilot Program be limited to three consecutive annual periods with semi-annual reports from the participating utilities. CURB also suggested one additional contact more than proposed by Staff in connection with the Pilot Program.

8. Other parties also filed responses to Staff's November 4, 2016 R&R.¹⁹ Thereafter, Staff filed a reply to the responses of the parties on November 29 2016.²⁰ With respect to CURB's suggestions, Staff agreed that the pilot program should be limited to three annual periods with semi-annual reports to be provided by the participating utilities. Staff also agreed that an additional

16 id.

17 id.

18 CURB's Comments on Staff's Report and Recommendation (November 14, 2016)

19 Southern Pioneer Electric Company's Response to Notice of Filing of Staff's Report and Recommendation and CURB's Comments on Staff's Report and Recommendation (November 21, 2016); Westar Energy Letter of Response to Staff's Report and Recommendation and CURB Comments (November 21, 2016)

20 Commission Staff's Comments on Responses to Staff's Report and Recommendation (November 29, 2016)

contact should be attempted by the utilities before disconnection of utility services. Staff made this reply to show its position with respect to the responses made by the parties and to inform the Commission that considerable progress on forming a mutually agreeable program was being accomplished by the parties, hopefully resulting in a pilot program that would be jointly recommended by the parties to the Commission.²¹

9. Upon the filing of Staff's reply, the participating utilities filed responses. Thereafter, the parties met and negotiated the elements of a pilot program that they could jointly propose to the Commission. On March 7, 2017, the parties filed a Joint Motion to Approve Temporary Waiver.²² The parties anticipated a waiver for Southern Pioneer and Everygy of the knock and collect requirement for a maximum period of three years only to apply to customers with AMI meters installed.²³ The Joint Movant's proposed temporary waiver separated the procedure as to "Cold Weather Rule" and "Non-Cold Weather Rule" periods, as follows:

A. Non-Cold Weather Rule Months (April 1 - October 31):

- (1) Ten (10) days prior to disconnection, the Utility shall mail a "Notice of Disconnection" letter to the Customer. The Utility shall mail this letter separately from a utility bill or any other correspondence.
- (2) Five to seven (5-7) days prior to disconnection, the Utility shall attempt to contact the Customer via the Customer's preferred choice informing the Customer of the Utility's intent to disconnect.
- (3) Two (2) days prior to disconnection, the Utility shall attempt to contact the Customer via a Phone Call informing the Customer of the Utility's intent to disconnect.
- (4) One (1) day prior to disconnection, the Utility shall attempt to contact the Customer via Customer's preferred choice informing the Customer of Utility's intent to disconnect.
- (5) On the day of disconnection, the Utility may disconnect the Customer. The Utility shall not be required to make an on premises collection attempt or leave a door tag.

21 id.

22 Joint Motion to Approve Temporary Waiver (March 7, 2017)

23 id.

B. Cold Weather Rule Months (November 1 - March 31):

(1) Ten (10) days prior to disconnection, the Utility shall mail a "Notice of Disconnection" letter to the Customer. The Utility shall mail this letter separately from a utility bill or any other correspondence.

(2) Five to seven (5-7) days prior to disconnection, the Utility shall attempt to contact the Customer via the Customer's preferred choice informing the Customer of the Utility's intent to disconnect.

(3) Two (2) days prior to disconnection, the utility shall attempt to contact the Customer via a Phone Call informing the Customer of the Utility's intent to disconnect.

(4) One (1) day prior to disconnection, the Utility shall attempt to contact the Customer via a phone call informing the Customer of Utility's intent to disconnect.

(5) If the attempted phone contact described in step iv is not successful, the Utility shall place a door tag at the customer's premises one day prior to disconnection. The Utility may then disconnect service on the day of disconnection (unless otherwise prohibited by the Cold Weather Rule).

(6) If the attempted one contact described in step iv is successful, the Utility shall not be required to place a door tag at the premises one day prior to disconnection. The Utility may then disconnect service on the day of disconnection (unless otherwise prohibited by the Cold Weather Rule). Westar and Southern Pioneer agree to reduce their disconnection and reconnection fees to \$5 and \$0, respectively, and only for those customers subject to the pilot program.²⁴

10. By Order issued on August 7, 2017, the Commission approved a limited waiver of the Commission's Billing Standards as a three-year pilot program (hereafter referred to as "Pilot Program") for Westar, now Evergy Kansas Central (hereinafter sometimes referred to as Evergy) and Southern Pioneer Electric Company ("Southern Pioneer") (collectively "participating electric utilities").²⁵ In that Order, the Commission stated:

The Commission believes the technological advances that AMI meters implement presents an opportunity to streamline utility operations and reduce costs to customers. However, the Commission is also mindful of the ratepayer protections currently contained within the Commission's Billing Standards. The Billing Standards have served the State of Kansas well for decades, and the Commission takes seriously its obligation to carefully evaluate current technology and its effect on utilities and ratepayers. The Pilot Program as requested by the Joint Movants will assist the Commission in evaluating and balancing these interests.²⁶

24 id.

25 Order Approving Pilot Program (August 7, 2017)

26 Order Approving Pilot Program, ¶13 (August 7, 2017)

The Pilot Program included bi-annual reporting requirements, and included customer education requirements. It was also subject to midpoint and final reviews.²⁷

11. On April 13, 2018, Evergy filed its first bi-annual report. This report included data the company collected from October 2017 through March 2018.²⁸ Similarly, on April 17, 2018, Southern Pioneer filed its first bi-annual report on data it collected from October 2017 through March 2018.²⁹

12. Evergy filed its second bi-annual report on October 16, 2018, based upon data it collected from April 2018 through September 2018.³⁰ Similarly, Southern Pioneer filed its second bi-annual report on October 30, 2018. This report included Southern Pioneer data collected from April 2018 through September 2018.³¹

13. On December 7, 2018, Joint Movants filed a motion to modify the midpoint review schedule requesting that the Parties have until January 16, 2019 to submit a recommendation regarding continuation of the Pilot Program.³² The Commission granted this motion by Order issued on February 14, 2019.³³

14. On January 16, 2019, CURB filed its comments based upon its midpoint review.³⁴ In that filing, CURB recommended that the Pilot Program be continued for the participating electric utilities. CURB's recommendation was primarily based upon its belief that continuation of the Pilot Program and its reporting requirements would result in additional data and sufficient

27 id.

28 Semi-Annual Compliance Report Submitted by Westar Energy, Inc. April 2018 (April 13, 2018)

29 Southern Pioneer Electric Company Bi-Annual Report for 10/01/2017 – 03/31/2018 (April 17, 2018)

30 Semi-Annual Compliance Report Submitted by Westar Energy, Inc. October 2018 (October 16, 2018)

31 Southern Pioneer Electric Company Bi-Annual Report for 4/01/2018 – 09/30/2018 (October 30, 2018)

32 Joint Motion to Modify Midpoint Review Schedule (December 7, 2018)

33 Order Adopting Joint Procedural Schedule (February 14, 2019)

34 CURB's Comments Regarding the Midpoint Review (January 16, 2019)

information to allow the Commission to determine whether the Pilot Program should be made permanent. Second, CURB had not identified any negative data or information that would necessitate an early termination of the Pilot Program.

15. Evergy filed its third bi-annual report on April 15, 2019, based upon data it gathered from October 2018 through March 2019.³⁵ Likewise, Southern Pioneer filed its third bi-annual report on April 28, 2019, based upon data from October 2018 through March 2019.³⁶

16. Evergy filed its fourth bi-annual report on October 18, 2019 for the period April 2019 through September 2019.³⁷ Southern Pioneer filed its fourth bi-annual report on October 31, 2019 from data gathered April 2019 through September 2019.³⁸

17. On April 15, 2020, Evergy filed its fifth compliance report from data it gathered during October 2019 through March 2020.³⁹ In addition, Evergy included results in its survey that Evergy believes demonstrate that the pilot is not negatively affecting customers in any way.

18. Southern Pioneer filed its fifth compliance report on April 29, 2020 from statistics it gathered from October 2019 through March 2020.⁴⁰ The company also presented customer survey results regarding the effectiveness of the Knock and Collect program.

19. On June 4, 2020, the Commission approved the following revised Knock and Collect schedule:

October 15, 2020 –	Bi-annual reports by Evergy and Southern Pioneer due;
December 15, 2020 –	Final recommendations regarding whether the applicable Billing Standards should be

35 Semi-Annual Compliance Report Submitted by Westar Energy, Inc. April 2019 (April 15, 2019)

36 Southern Pioneer Electric Company Bi-Annual Report for 04/01/2018 – 09/30/2018 (, 2018)

37 Semi-Annual Compliance Report Submitted by Westar Energy, Inc. October 2019 (October 18, 2019)

38 Southern Pioneer Electric Company Bi-Annual Report for 04/01/2019 – 09/30/2019 (October 31, 2019)

39 Semi-Annual Compliance Report Submitted by Westar Energy, Inc. April 2020 (April 15, 2020)

40 Southern Pioneer Electric Company Bi-Annual Report for 10/01/2019 – 03/31/2018 (April 29, 2020)

January 15, 2021 – permanently modified or whether a permanent waiver should be approved;
Responses to Final Recommendations by other Parties due;
February 26, 2021 – Commission Order due regarding whether the applicable Billing Standards should be permanently modified or whether a permanent waiver should be granted.

Moreover, as part of the request for a revised schedule, the Parties' Motion requested that the Commission extend the effective date of the Knock and Collect Pilot Program from the current end date of September 16, 2020, through 30 days after the date the Commission issues its final order in this docket.⁴¹

20. On October 13, 2020, Southern Pioneer filed its sixth bi-annual report for the period April 2020 through September 2020.⁴² Evergy filed its sixth bi-annual report on October 16, 2020.⁴³

COMPANY REPORTS

21. Evergy and Southern Pioneer have each filed with the Commission six semi-annual reports (these six semi-annual reports will be generally referred to herein as "reports"). The reports cover a three-year period, beginning October 1, 2017 and ending September 30, 2020. The reports show that, over the three-year period, Evergy's deployment of AMI meters has increased from 93 percent on March 31, 2018 to 99.77 percent on September 30, 2020; Southern Pioneer's deployment of AMI meters has remained nearly 100 percent throughout the three-year period, having only 4 analog meters out of 17,000 plus meters.

22. The reports provide insight into the billing and collection practices of Evergy and Southern Pioneer through a number of metrics compiled on a monthly basis throughout the three-

⁴¹ Order Granting Joint Motion for Revised Schedule (June 4, 2020)

⁴² Southern Pioneer Electric Company Bi-Annual Report for 04/01/2020 – 09/30/2020 (October 13, 2020)

⁴³ Semi-Annual Compliance Report Submitted by Evergy Kansas Central, Inc. October 2020 (October 16, 2020)

year period. For example, the reports show the number of customer billings, the number of disconnection notices made ten days before disconnection, the number of additional contacts made by the utility to delinquent customers, the total number of disconnects and the total number of collections made at the door of delinquent analog-metered customers by Evergy. Evergy's reports have a breakdown between AMI meters and analog meters but Southern Pioneer's reports do not.

23. Importantly, these metrics were formed through collaboration between the utilities, KCC staff and CURB, principally occurring in 2016. The collaboration culminated in a Joint Motion filed by said parties with the Commission on March 7, 2017, seeking Commission approval of the creation of a pilot program temporarily waiving the "knock and collect" requirement of the Commission's Billing Standards for Evergy and Southern Pioneer. Essentially, all parties agreed that the metrics would develop sufficient information during the pilot program for the parties to recommend to the Commission whether the "knock and collect" requirement of the Commission's Billing Standards should stay in place for Evergy and Southern Pioneer. As noted above, the Commission approved that Joint Motion on November 17, 2017, thereby approving the metrics.

24. The reports filed in this docket by both Southern Pioneer and Evergy are very detailed and complete. It is unnecessary to detail every aspect of the reports. However, CURB believes that some of the metrics warrant mention. First, the reports show that very few disconnects occurred during the pilot program for both Evergy and Southern Pioneer relative both to the number of customer billings made each month and to the number of customers who were given ten-day disconnect notices during the pilot program. Second, the reports show that a significant number of delinquent customers paid their utility bills after receiving the 10-day notice, with additional delinquent customers paying their utility bills after the five-day, two-day, and one-day notices that utility services would be disconnected. Third, the reports show that personal contact

with the delinquent analog meter customer yielded a very small number of collections during the pilot program. In fact, a large number of payments from delinquent customers were made post-disconnection, with a large majority of those payments being made within the first two days of services being disconnected. Fourth, the reports show that the costs associated with continuing the “knock and collect” requirement of the Commission’s Billing Standards is substantial.

CURB RECOMMENDATION

25. As it pertains to CURB’s recommendation in this docket, CURB believes that its most important role is to advocate for low-income utility ratepayers. By advocating for reliable energy at the lowest reasonable cost, CURB helps to maintain the affordability of energy for low-income Kansans. Affordable energy helps low-income ratepayers to keep the lights on. In accordance with its statutory mission, CURB attempts to do all it reasonably can to ensure that low-income ratepayers will be able to pay their utility bills.

26. CURB looks at the issues of this docket through that lens. CURB recognizes that the “knock and collect” requirement of the Commission’s Billing Standards provides another opportunity for delinquent ratepayers to avoid disconnection of their utilities. That additional opportunity to avert disconnection is important to many. However, the issue in this docket is the efficacy of continuing the “knock and collect” requirement of the Commission’s Billing Standards toward helping low-income ratepayers to maintain their utility services, in light of alternative collection practices, particularly the pilot program in this docket.

27. In its February 5, 2015 R&R in this docket, Staff noted that “the development of digital meters has presented electric companies an opportunity to reduce costs and save resources, but determining the appropriateness of a remote disconnect procedure is an important policy

decision that requires careful consideration and input from a broad range of stakeholders.”⁴⁴ Fundamentally, CURB believes that careful consideration of the issue should include a cost-benefit analysis of continuing the “knock and collect” requirement of the Commission’s Billing Standards for Southern Pioneer and Evergy. This cost-benefit analysis should not be confined merely to the benefit it provides utility customers to avert disconnection. Rather one must also consider whether continuing the “knock and collect” requirement effectively addresses and alleviates the cause why low-income ratepayers’ utility services are disconnected.

28. Upon review of the reports, CURB believes that the “knock and collect” requirement of the Commission’s Billing Standards should be permanently waived for Evergy Kansas Central and Southern Pioneer, but subject to the condition described in paragraph 29 below, so that both utilities can implement the elements of the pilot program permanently without further reporting. There are principally three reasons why CURB so believes. First, the cost of continuing the “knock and collect” requirement of the Commission’s Billing Standards heavily outweighs its benefits toward helping low-income customers maintain their utilities. Second, there are substantial benefits to low-income ratepayers that will occur by making the pilot program permanent. Third, many state public utility commissions do not require on-premises collection attempts by utilities as part of disconnection procedures, and on-premises bill collection is antiquated in light of the changing nature of commerce from a cash-based economy to Ecommerce. CURB will address these points in some detail below in paragraphs 31 through 57.

29. However, CURB urges that the permanent waiver of the “knock and collect” requirement for Evergy Kansas Central and Southern Pioneer carry the condition that the utilities

⁴⁴ Commission Staff Report and Recommendation, p. 2 (February 5, 2015) attached to Order Adopting Staff’s Report and Recommendation and Opening General Investigation (Feb. 26, 2015)

meet with Staff and CURB concerning what the utilities, CURB and Staff can do to target and reduce the energy burden faced by low-income Kansans. CURB hopes that the utilities will commit to this discussion in their responses to CURB's recommendation. CURB's will discuss this request further below in paragraphs 59 through 74.

30. CURB believes that Commission should confine the permanent waiver of the "knock and collect" requirement of the Commission's Billing Standards to Southern Pioneer and Eversource Kansas Central at this time. First, no other utility has asked for a permanent waiver of this requirement. Moreover, the Commission has already recognized the prevalence of AMI meters as forming the basis for avoided costs relative to disconnection of utility services. CURB is unaware of the prevalence of AMI meters among utilities other than Eversource Kansas Central and Southern Pioneer. Other utilities can apply for permanent waivers of the "knock and collect" requirement, and these applications can be determined on their particular set of facts.

Cost-Benefit Analysis of Continuing the "Knock And Collect" Requirement.

31. In CURB's view, the cost of continuing the "knock and collect" requirement of the Commission's Billing Standards significantly outweighs the benefits that the requirement provides towards helping low-income ratepayers, in light of alternative collection practices such as the pilot program. CURB acknowledges that the "knock and collect" requirement benefits low-income ratepayers by providing one last potential contact with the utility whereby a delinquent ratepayer can pay his or her bill or agree to a payment plan to avoid disconnection. That contact is not guaranteed, however. If the ratepayer is not home or does not come to the door, the utility is only required to leave a notice upon the premises indicating that utility service has been disconnected.

32. Indeed, the reports show that the percentage of delinquent accounts that are resolved at the door through "knock and collect" is less than two percent of total delinquent

billings. For example, Evergy's reports show that for the period October 2017 through March 2018, Evergy collected past-due accounts from 780 analog metered customers through "knock and collect" out of 47,270 total delinquent billings of analog metered customers. For the period April 2018 through September 2018, Evergy collected past-due accounts from 361 analog metered customers out of 20,063 total delinquency billings of analog metered customers. The statistics show that a very small percentage of customers actually paid their utility bills through "knock and collect" in order to avoid disconnection.

33. Actually, the reports indicate that the vast majority of delinquent customers do not wait for "knock and collect" to pay their past-due bills in order to avoid disconnection. A number of customers pay their delinquent bills upon the 10-day, five-day, two-day, and one-day notices provided to them by Evergy. The vast majority of Evergy and Southern Pioneer customers do not need someone to attempt to collect at their doors; they need access to funds.

34. Indeed, common sense indicates that the reason why low-income ratepayers do not pay their utility bills on time is their lack of funds. The "knock and collect" requirement of the Commission's Billing Standards does not change that reality. In fact, some studies show that when confronted by a creditor, many debtors give up food, medicine or other essentials due to the pressure to bring the accounts current.⁴⁵ Likewise, when a utility representative confronts a customer at the door, informing the customer that his or her utility services will be disconnected unless the past-due bill current is paid immediately or the customer agrees to a payment schedule,

⁴⁵ See for example, Testimony of April Kuehnhoff, National Consumer Law Center Before the U.S. House of Representatives Committee on Financial Services regarding "Examining Legislation to Protect Consumers and Small Business Owners from Abusive Debt Collection Practices" (September 26, 2019); retrieved at https://www.nclc.org/images/pdf/debt_collection/testimony-kuehnhoff-debt-collection-sept2019.pdf. See also Laura M. Tach & Sara Sternberg Greene, "Robbing Peter to Pay Paul": *Economic and Cultural Explanations for How Lower-Income Families Manage Debt*, 61 *Social Problems* 1 (Feb. 2014).

the customer often scrambles to find money. “Knock and collect” does not lighten the customer’s burden, it complicates it.

35. However, CURB believes that there is a humanitarian aspect of any requirement that utilities must knock on delinquent customer’s doors before disconnecting those customer’s utilities. Yet, the customer does not necessarily prefer that personal contact. Some studies show that debtors least prefer personal contact by their creditors in the collection of past-due accounts.⁴⁶ At its base, “knock and collect” is an attempt to collect past-due utility accounts. There is no credit counseling involved. There is no debt forgiveness. If the delinquent customer cannot pay the bill or agree to a payment plan, the customer is disconnected.

36. Rather, the humanitarian aspect of personal contact with delinquent customers through “knock and collect” benefits the utility inasmuch it is a human-to-human reminder that there are some who cannot pay their utility bills through no fault of their own. CURB anticipates that information about the interactions utility personnel experience in collecting past-due bills through “knock and collect” travels upwards through the organizations to the executives of the utilities. In these regards, one would hope that utilities would develop great empathy for those who need their services but struggle to afford them. Antithetical to human interaction, the practice of merely flipping a switch to disconnect an essential service needed by a human being is a sterile practice, devoid of human contact. Low-income customers should not be treated merely as an account. Human contact is a beneficial touchpoint with low-income customers.

⁴⁶ Consumer Financial Protection Bureau. Consumer Experiences with Debt Collection, Findings from the CFPB’s Survey of Consumer Views on Debt. (January 12, 2017) Retrieved at <https://www.consumerfinance.gov/data-research/research-reports/consumer-experiences-debt-collection-findings-cfpbs-survey-consumer-views-debt/>

37. However, the cost avoided by discontinuing the “knock and collect” requirement of the Commission’s Billing Standards is substantial. For example, the reports filed by Evergy show that the pilot program resulted in approximately \$700,000.00 in avoided costs for the period from October 2018 through September 2019. For the same period, the reports filed by Southern Pioneer (having approximately 17,000 customers) show that the pilot program avoided \$50,000.00 in costs annually. In sum, the reports show that it would cost substantial monies for Evergy and Southern Pioneer to continue the “knock and collect” requirement.

38. Importantly, these costs would be borne by ratepayers through higher bills if the “knock and collect” requirement were continued. These costs do not have significant impact upon any particular customer’s bill, due to the large number of customers who pay their bills on time relative to the number of customers who do not pay their bills before the date of disconnection. However, the high costs of continuing the “knock and collect” requirement relative to the actual benefits of the requirement cannot be ignored. It is an expensive requirement potentially benefiting relatively very few customers. For that reason, CURB struggles to find justification in continuing the “knock and collect” requirement. Yet, there are additional reasons to discontinue the requirement.

39. Ratepayer cost aside, the real travesty in spending large sums of money on the “knock and collect” requirement is that these expenditures do not materially address the cause of the delinquencies. In particular, continuing the “knock and collect” requirement of the Commission’s Billing Standards would do little to reduce the energy burden suffered by low-

income ratepayers in Kansas. Energy burden is defined as a disproportionate allocation of financial resources on energy expenditures by low-income households.⁴⁷

40. Statistics show that 115,678 Kansan owner-occupied households (15% of all owner-occupied households) had housing costs (including utility bills) in excess of 30% of household income in 2019.⁴⁸ In addition, 150,921 Kansas rental households had housing costs in excess of 30% of income in 2019, constituting 42% of all Kansas rental households.⁴⁹ A review of the percentage of Evergy and Southern Pioneer ratepayers who become delinquent on utility bills shows a parallel, and perhaps some correlation, to these statistics. In short, CURB believes that the energy burden faced by low-income consumers contributes to their inability to meet housing costs. While the “knock and collect” requirement of the Commission’s Billing Standards allows delinquent customers an opportunity to avert disconnection, it does not alleviate the underlying energy burden faced by low-income customers.

41. Indeed, in CURB’s view the “knock and collect” requirement is not cost-beneficial in alleviating the energy burden. True, outreach conducted by utilities under the Commission’s Billing Standards to inform customers of available bill assistance or energy efficiency strategies may be marginally helpful. Yet, these outreach efforts may not be enough. Moreover, outreach can be conducted by utilities without the need of on-premises debt collection.

42. If the “knock and collect” requirement is continued, Evergy and Southern Pioneer will spend large sums of money on a program that does not materially address the underlying cause of the delinquencies. The high cost of continuing the “knock and collect” requirement of the

47 Bird, Stephen; Hernandez, Diana, Energy Burden and the Need for Integrated Low-Income Housing and Energy Policy (November 2010) Retrieved at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4819257/>

48 Kansas State Data Center Institute for Policy & Social Research. The University of Kansas Housing Data in the American Community Survey (December 10, 2020)

49 id.

Commission's Billing Standards relative to the benefit provided to low-income customers is manifest. By continuing the "knock and collect" requirement of the Commission's Billing Standards, monies spent on that requirement do not significantly elevate low-income Kansas households out of their energy burden.

43. Continuing the "knock and collect" requirement has even more than nominal costs. Personal contact with customers creates some health risk and cost associated with avoiding these risks, such as PPE, etc. The risk and costs associated with personal contact has become very apparent with the COVID 19 pandemic. Yet, even in the absence of the pandemic, there is always risk that contact between the utility customer and utility representative could spread infectious diseases, among other risks. There is also a safety risk for utility representatives who carry cash with them after receiving payment from customers. These representatives could be targeted by thieves.

44. In sum, the "knock and collect" requirement of the Commission's billing has costs that substantially outweigh the benefits of the requirement. Relatively very few Evergy or Southern Pioneer customers rely upon "knock and collect" to pay their past-due utility bills. More importantly, the fact that "knock and collect" does not significantly help reduce the energy burden faced by many low-income Kansans dictates that this requirement be permanently waived.

Benefits of Continuing the Pilot Program to Replace "Knock And Collect".

45. The pilot program offers several important benefits to the ratepayers who struggle to pay their utility bills. With the pilot program, there is a reduction in the disconnection charge from \$15 to \$5 per transaction with no charge for reconnection due to the reduced costs associated

with AMI meters. Customers save \$30 per disconnection/reconnection. When a customer is already struggling to pay their utility bills, adding \$30 to a delinquent bill is not helpful.

46. In addition, the pilot program results in additional notice of potential disconnection being made to the utility customer. Under the pilot program, delinquent customers are given disconnection notices at ten (10), five to seven (5-7), two (2), and one (1) day prior to disconnection. The additional notices are beneficial especially when combined with the communication methods being chosen by the customer (phone call, email, or text message). Under the pilot program, delinquent customers will receive notices in the manner they believe most suitable to them and more opportunities to make payment before their service is disconnected.⁵⁰

47. Finally, the pilot program was made possible by the installation of AMI meters throughout Evergy's and Southern Pioneer's systems. Consequently, customers can be reconnected within a matter of a few hours (sometimes minutes) after their bills are paid. With analog meters, the goal (which was not always met) was same-day reconnection after payment. On cold and hot weather days, the speed of reconnection is a benefit arising from AMI meters which formed the basis for the pilot program.

48. To recap, the pilot program will result in lower disconnection/reconnection fees, which benefits customers who are disconnected in spite of "knock and collect." The pilot program also allows customers to choose the means by which they will receive notice of impending disconnection and to receive more notice than under the Commission's Billing Standards. Finally, the pilot program would not have been possible without AMI meters that allow for much quicker reconnection than was possible with analog meters. The speed by which services are reconnected

⁵⁰ Mike Rinehart, Westar Energy, Application for Westar Energy Inc. and Kansas Gas and Electric Company, 15-WSEE-188-MIS, October 30, 2014.

through AMI meters obviates the need for last minute notice to avert disconnection with analog meters that entailed days to reconnect services. Therefore, CURB believes that the benefits of the pilot program further justify discontinuance of the “knock and collect” requirement.

“Knock and Collect” is Not Required for Public Utilities in Many Other States.

49. It does not appear that attempted on-premises collection of past-due accounts is universally required by state public utility commissions. In these regards, CURB has conducted some cursory research concerning public utility commissions that are in the geographic region of Kansas and elsewhere.⁵¹ While Missouri requires on-premises notification at the time of disconnection, it does not appear to require expressly that the utility representative attempt to collect payment at that time. Further, CURB believes that the public utility commissions in Oklahoma and Iowa do not require utilities to have personal contact with their customers before they disconnect services for non-payment. Some state public utility commissions list personal contact as an option for providing notice, but attempted on-premises collection does not appear to be universally required.

50. In Oklahoma, the Public Utility Commission establishes rules for utility disconnection.⁵² Under those rules, a utility can disconnect a customer for failing to pay a bill in full upon notice. The utility may disconnect service on the date specified in the notice or within thirty (30) days thereafter, during regular business hours, so long as the disconnection does not

51 The research that CURB conducted on utility collection practices is very cursory and subject to error. However, in general, CURB is confident in saying that on-premises attempted collection of past-due utility bills does not appear to be required in all states. It does not appear to be cited as a “best practice” universally.

52 Oklahoma Corporation Commission. Electric Utility Rules. Secgion165:35-21-1. Updated, Effective 7/1/2002

occur within the last two (2) hours of the business day, nor shall service be disconnected on a holiday, nor after noon (12:00 p.m.) on Fridays until Monday morning.⁵³

51. In Iowa, the utility must provide notice to the consumer at least 12 days before the utility service can be disconnected for nonpayment.⁵⁴ This notice must include the reason for disconnecting utility service. In addition, the utility must also attempt to reach the consumer by telephone or in person before it disconnects service.⁵⁵

52. In each of the foregoing states, CURB cannot find any requirement that the utility is required to attempt to collect the delinquent account from the consumer in person at their residence before disconnecting service. While Iowa does require a notification attempt either in person or by telephone before disconnection, it does not require “knock and collect.” Moreover, Missouri does not appear to require an attempt to collect the delinquency on-premises at time of disconnection. The pilot program with multiple notices in the manner requested by the customer, including notice one day in advance of disconnection, puts the pilot program at par with Iowa and Missouri, in CURB’s view.

53. Indeed, under the pilot program, Evergy and Southern Pioneer must provide notice at 10 days, five days, two days and one day before disconnection. The consumer has the choice on how to be notified. He or she can change that preference at any time. It is difficult to fathom that a delinquent utility consumer will not be notified that his or her bill is past-due and their services subject to disconnection. Rather, CURB believes that the real issue in non-payment is the lack of funds for some utility consumers, and “knock and collect” does not materially address that issue.

53 id.

54 CURB located this information from the following website: <https://www.sierraclub.org/iowa/blog/2020/04/utility-disconnections>

55 id.

54. Moreover, with computer and electronic advances, Ecommerce allows consumers to pay bills electronically. Under the pilot program, there are several options for consumers to choose how to pay their bills. Merely a few years ago, people shopped exclusively at brick and mortar stores, paid by check, used the U.S. mail to send that payment, and communicated chiefly in writing or by telephone. People did not have texting capabilities. People did not have email accounts. People did not generally use electronic fund transfers.

55. The world of commerce has changed. CURB believes that disconnection procedures with AMI meters should encompass new Ecommerce standards and conveniences. CURB believes that the notices provided by the pilot program benefit the consumer and are appropriate today. CURB recognizes that there may be some consumers who do not have access to computers, internet, or even telephone. As to these exceptions, the utility can work with the customer. However, CURB is unaware of the nature of such exceptions and believes there is enough flexibility in the pilot program to weather such exceptional circumstances.

56. Moreover, the requirement that utilities allow customers to pay delinquencies to a utility representative while they are on the premises immediately preceding disconnection is open to potential fraud. Persons imitating utility personnel can go to consumers' doors and attempt to defraud the customers by threatening disconnection if payments are not immediately made. Eliminating "knock and collect" could alleviate that potential source of fraud, particularly if customers are informed that utilities do not attempt to collect past-due utility accounts on-premises.

57. Therefore, CURB believes that the pilot program is reasonable, in light of how other state public utility commissions handle utility delinquencies. Moreover, the pilot program is appropriate relative to Ecommerce conventions. Importantly, in the three-years that the pilot

program has been in existence, Evergy and Southern Pioneer report that they have not had complaints about the new protocols. Therefore, CURB believes that neither the practices of other state PUCs nor the lack of electronic advances warrants continuation of the “knock and collect” requirement of the Commission’s Billing Standards.

58. However, for the reasons set forth below, CURB suggests that the Commission’s approval of a permanent waiver should be conditioned upon the participating utilities engaging with CURB, Staff and other interested stakeholders to address the energy burden suffered by a substantial number of Kansas ratepayers. In these regards, CURB hopes that the utilities will commit to a discussion with CURB and Staff concerning what efforts can be made by the utilities, CURB and Staff toward alleviating the energy burden faced by low-income customers without the need for a condition to elimination of the “knock and collect” requirement in this docket. CURB believes that the parties can work together and present programs within a reasonably short time after the Commission’s Order in this docket.

Eliminating the “Knock and Collect” Requirement Should be Conditioned upon a Commitment of the Utilities to Meet with CURB and Staff to Address the Energy Burden.

59. The “knock and collect” requirement of the Commission’s Billing Standards was obviously intended to benefit utility customers who were unable to pay their utility bills on time. It recognized the energy burden suffered by some Kansas ratepayers, thus providing one last opportunity for the delinquent customer to avoid disconnection by payment or an agreement to enter into a payment plan with the utility. The Commission has found that the “knock and collect” requirement has served Kansas ratepayers well throughout the years.⁵⁶

⁵⁶ Order Adopting Staff’s Report and Recommendation and Opening General Investigation (Feb. 26, 2015)

60. The “knock and collect” requirement of the Commission’s Billing Standards coincided with the existence of analog meters since remote disconnection of utility services was impossible. However, with AMI meters, disconnection of utility services can be performed remotely which allows cost to be avoided. Indeed, as discussed earlier, Evergy and Southern Pioneer have reported thousands of dollars of costs that can be avoided by eliminating the “knock and collect” requirement permanently.

61. Even with the nearly universal replacement of analog meters with AMI meters by the participating utilities, the “knock and collect” requirement of the Commission’s Billing Standards would continue to provide delinquent ratepayers a last resort to avoid disconnection. Albeit the numbers are very small (and arguably would not justify the expenditures of thousands of dollars to continue the requirement), some Kansas ratepayers still use “knock and collect” to avoid disconnection of utility services. No doubt, there is some value in keeping low-income utility customers connected to necessary utility services. In fact, upon information and in good faith, CURB believes that the Staff’s survey questions were intended to determine the need for “knock and collect” to remain as a payment option so that ratepayers would not be disconnected. CURB believes that Staff was looking to determine the value of attempted on-premises collection.

62. Significantly, the value of attempted on-premises collection lies in its attempt to help those who are energy burdened. The energy burden confronted by many Kansans is the cause for many utility delinquencies in Kansas. Therefore, to reduce the number of utility delinquencies, the energy burden suffered by many Kansans must be alleviated.

63. Indeed, it is failure of the “knock and collect” requirement to reduce significantly the energy burden that most persuades CURB to advocate for permanent waiver of that requirement for Evergy Kansas Central and Southern Pioneer. The energy burden is a very real

and growing problem. According to the American Council for an Energy Efficiency Economy (ACEEE), about 23 percent of households in the United States have incomes at or below the federal poverty guideline, yet may pay up to three times more on home energy cost, as a proportion of total income, than does the average U.S. household.⁵⁷ As shown earlier, 15% of Kansans who own their home are cost-burdened.

64. In describing the energy burden, ACEEE notes that low-income households encounter several disadvantages regarding energy affordability. For example, low-income householders may live in homes that are weather inefficient and may own older and less efficient appliances, including heating and cooling units.⁵⁸ It is not necessary to discuss those disadvantages here. Yet, it is important to note that utilities, consumer advocates and public utility commissions could do more to address and alleviate the energy burden faced by many utility customers.

65. Indeed, research shows three distinct but interrelated effects of the energy burden: (a) illness and stress, (b) financial challenges, and (c) housing instability.⁵⁹ In addition to these effects, arrearages caused by the inability of low-income households to pay their utility bills affect utilities and, ultimately, all other consumers by adding costs of collection and unrecoverable debt to the system. In short, there is societal benefit to alleviating the energy burden suffered by many Kansans.

66. Thus, one of the chief reasons why CURB believes the pilot program should be approved as a permanent waiver of the “knock and collect” requirement of the Commission’s

57 American Council for an Energy-Efficient Economy. Supporting Low-Income Energy Efficiency: A Guide for Utility Regulators. (2020) Retrieved from <https://aceee.org/sector/state-policy/toolkit/supporting-low-income>

58 id.

59 Bird, Stephen; Hernandez, Diana, Energy Burden and the Need for Integrated Low-Income Housing and Energy Policy (November 2010) Retrieved at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4819257/>

Billing Standards is that a knock at a low-income household does not materially alleviate the energy burden suffered by many Kansans. In CURB's view, the "knock and collect" requirement does not really address the causes why some household cannot pay their utility bills, and the effects thereof. It has substantial cost relative to the benefit it provides to those who are energy-burdened.

67. The cost of continuing the "knock and collect" requirement in view of its failure to address effectively the energy burden faced by Kansans is not justifiable. However, the Commission must take advantage of the opportunities created by identifying the issues in this docket, or those opportunities may become wasted. Therefore, CURB requests the Commission condition discontinuing the "knock and collect" requirement upon a commitment of the utilities to engage with CURB and Staff to discuss what can be efficiently done by the parties to address the energy burden suffered by several Kansans.

68. CURB recognizes that the costs avoided by allowing the pilot program to be used as a permanent waiver of the "knock and collect" requirement for the participating utilities reduce utility expenses and thereby reduce rates for ratepayers. However, at the overall potential avoided costs reported by the participating utilities, there would be minimal rate impact for an individual ratepayer. In short, reducing expenses for the participating utilities, thus reducing rates by an insignificant margin, would not be felt by any individual ratepayer. Yet, using this docket as a springboard to help low-income customers to be able to afford their utility bills would be a needed relief for many.

69. Kansans are a generous and caring people. Cognizant of the many efforts that Kansas utilities have made to help ratepayers through the effects of COVID 19, CURB believes that utilities would want to do a little more to help those of their customers who are in need. CURB believes that funds expended for those purposes would be recoverable by the utilities in their rate

cases. If ratepayers, utilities and the Commission are not sympathetic about customers whose energy burden has been amplified by COVID 19, when will they ever be?

70. CURB acknowledges that the utilities already attempt to help low-income customers through outreach and other means. Yet, CURB believes that more can be done. CURB is merely asking for a discussion, in connection with this docket, as to what more can be done to help low-income utility customers to be able to pay their bills.

71. The permanent waiver of the “knock and collect” requirement of the Commission’s Billing Standards presents an opportunity to address the energy burden faced by many Kansans. It is an issue that is in the interest of the public generally. Certainly, it is possible to take up that issue later. Yet, the opportunity is “knocking” at the door right now.

72. Thus, CURB hopes that the participating utilities and Staff will look favorably upon this proposal and will agree to meet and discuss the possibilities so that a proposal could be presented to the Commission. Therefore, CURB hopes that the participating utilities will commit to such a discussion without the Commission imposing a condition for approval of the permanent waiver of “knock and collect” requirement of the Commission’s Billing Standards. CURB looks forward to the participating utilities’ responses to CURB’s recommendation.

73. CURB welcomes the opportunity to discuss the possibilities with the parties to this docket. CURB would appreciate any feedback from the participating utilities and Staff as to what parties can do to address the energy burden suffered by many Kansans. There are many avenues available, from energy efficiency measures, to educational campaigns toward utility assistance programs to many other means. Open discussion can benefit all.

74. CURB posits the following:
- A. The Staff, CURB, and participating utilities should work together to reduce the economic burden of low-income Kansans, to arrive at some program which would be subject to approval by the Commission.
 - B. Utilities should commit to address the energy burden suffered by low-income Kansans, through discussion with Staff and CURB; by means of weatherization, energy efficiency, educational programs, or other appropriate means.
 - C. The costs expended by utilities to address the energy burden should be recoverable from ratepayers.
 - D. If the parties cannot agree to work together on this issue, the Commission should condition the permanent waiver the “knock and collect” requirement of the Commission’s Billing Standards upon commitment of the utilities to meet with CURB and the Staff to address the energy burden in Kansas.

CONCLUSION

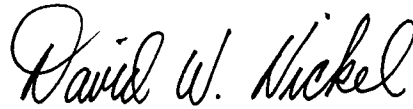
75. CURB appreciates the opportunities to work with the participating utilities concerning the pilot program and to furnish its comments regarding the same. Further, CURB appreciates the work that the participating utilities put forth in compiling data and presenting the many semi-annual reports in this docket. CURB believes that the pilot program was successful.

76. In view of the reports, CURB believes that the cost of continuing the “knock and collect” requirement of the Commission’s Billing Standards significantly outweigh its benefits. Utilities in surrounding states are not required to contact their delinquent customers personally before disconnection of those customers’ utility service. Most importantly, CURB believes that the “knock and collect” requirement of the Commission’s Billing Standards does not materially affect the energy burden suffered by those ratepayers who cannot pay their utility bills on time. To continue the “knock and collect” requirement at substantial cost is wasteful. Therefore, CURB requests that the Commission approve a permanent waiver of the “knock and collect” requirement

of the Commission's Billing Standards for the participating utilities so that they can employ the pilot program. No further reporting mechanisms should be required.

77. However, CURB requests that the Commission condition the permanent waiver of the "knock and collect" requirement of the Commission's Billing Standards on the utilities commitment to meet with CURB and Staff to find ways to address and alleviate the energy burden faced by many low-income Kansans. If the parties commit to such a discussion in their responses to CURB's recommendations, a condition to the elimination of the "knock and collect" requirement may not be necessary. CURB believes that this discussion should not be delayed.

Respectfully submitted,



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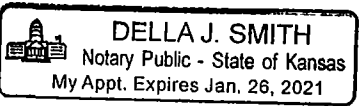
VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, David W. Nickel, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.

David W. Nickel
David W. Nickel

SUBSCRIBED AND SWORN to before me this 15th day of December, 2020.



Della J. Smith
Notary Public

My Commission expires: 01-26-2021.

CERTIFICATE OF SERVICE

15-GIMX-344-GIV

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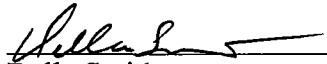
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