

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

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

**SOUTHERN PIONEER ELECTRIC COMPANY’S RECOMMENDATION
REGARDING CONTINUATION OF PILOT PROGRAM**

Southern Pioneer Electric Company (“Southern Pioneer”) hereby submits its recommendation regarding continuation of the pilot program waiving the Knock and Collect requirement for Southern Pioneer and Westar. (“Pilot Program”)¹ The Pilot Program contains a “Midpoint Review” for parties and the Corporation Commission of the State of Kansas’ (“Staff” and “Commission” respectively) to evaluate the performance of the Pilot Program.²

I. BACKGROUND

1. For purposes of brevity, Southern Pioneer will not recite the procedural background in this proceeding. Rather, Southern Pioneer will focus its general comments on the value of recommending continuation of the Pilot Program for the remainder of the 36-month period.

II. SOUTHERN PIONEER’S GENERAL COMMENTS

2. As approved by the Commission, effective October 1, 2017, Southern Pioneer implemented the Pilot Program for both the cold weather rule and the non-cold weather rule periods, and subsequently submitted two comprehensive bi-annual reports as agreed to by the parties and ordered by the Commission.³

¹ Order Approving Pilot Program (Aug. 17, 2017).

² Id. at pp. 6-7.

³ Id. at pp. 5-6.

3. During the first 12-months of the Pilot Program, as a result of the additional call attempts after the issuing of the 10-day delinquent customer notice, Southern Pioneer has experienced an overall reduction in the number of consumers delinquent at each phase of the collection process and the ultimate number of customer contacts at the time of disconnection if payment was not made. This acceleration in payments has enhanced Southern Pioneer's cash flow and management of delinquent debt.

4. During the first 12-months of the Pilot Program, Southern Pioneer has not received any customer complaints regarding the Pilot Program, the Pilot Program's stepped-up call frequency, lack of on premise attempt to collect or remote disconnection.

5. During the first 12-months of the Pilot Program, due to Southern Pioneer's rural 10-county southwest and south central Kansas service territory and the waiver of the requirement to no longer travel long distances to knock and attempt to collect prior to disconnection, Southern Pioneer conservatively calculated that it has avoided a moderate cost of approximately \$58,753. This has allowed Southern Pioneer to redirect its operations staff and the associated equipment to other critical utility maintenance or service functions in order to continue to provide reliable and safe electric service.

II. SOUTHERN PIONEER'S RECOMMENDATION

6. Because of the stepped up contacts resulting in accelerated payments positively impacting delinquent debt, the ability to avoid costs by utilizing Southern Pioneer's installed and fully deployed automated meter infrastructure technology to remotely disconnect, the efficiencies created by being able to redirect operational resources to provide safe and reliable service, and the absence of customer complaints equating to customer acceptance, Southern Pioneer requests that

the Commission authorize continuation of the Pilot Program for the duration of the 36-month period.

WHEREFORE, Southern Pioneer respectfully submits this recommendation for consideration and requests the Commission issue an order authorizing continuation of the pilot program for the remainder of the 36-month period.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above document was electronically served, this 16th day of January, 2019 to:

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