



Douglas J. Law
Associate General Counsel
Douglas.Law@blackhillscorp.com

1731 Windhoek Drive
Lincoln, NE 68512
P: 402.221.2635

December 3, 2024

Lynn M. Retz
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604

RE: Docket No. 24-GIMG-453-GIG
*Response of Black Hills/Kansas Gas Utility Company, LLC in Support of
Responses of Atmos Energy and Kansas Gas Service*

Dear Ms. Retz:

Enclosed for filing is the Response of Black Hills/Kansas Gas Utility Company, LLC in Support of Responses of Atmos Energy and Kansas Gas Service filed on behalf of Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy.

Respectfully submitted,

/s/ Douglas J. Law

Douglas J. Law, KS Bar #29118
Associate General Counsel

DL:ce

cc: Service List
Rob Daniel
Nick Smith
Rami Alnajjar

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of the Gas) Docket No. 24-GIMG-453-GIG
Utilities for a Waiver to the Commission’s)
Electric and Natural Gas Utilities’ Billing)
Standards Related to Allow for a Permanent)
Discontinuance of the Knock and Collect)
Provision in Said Billing Standards.

**RESPONSE OF BLACK HILLS/KANSAS GAS UTILITY COMPANY, LLC IN
SUPPORT OF RESPONSES OF ATMOS ENERGY AND KANSAS GAS SERVICE**

Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills Energy (“Black Hills” or “Company”) hereby submits this response in support of the recently filed reply comments (“Replies”) of Atmos Energy (“Atmos”), and Kansas Gas Service (“KGS”) regarding the Kansas Corporation Commission (the “Commission”) Staff’s Report and Recommendation (“Staff’s R&R”) and the Citizen Utility Ratepayers Board (“CURB”) reply filed in the above-captioned docket. This filing is made in support of the permanent waiver of the “knock and collect” provision of the Commission’s *Electric, Natural Gas, and Water Billing Standards* (“Billing Standards”) and to address the issues of 1) disconnection and reconnection fees and 2) energy insecurity as discussed in the filings.

I. PERMANENT WAIVER OF THE KNOCK AND COLLECTION PROVISION OF THE BILLING STANDARDS

The Commission Staff, CURB, Atmos, and KGS have each provided comments in support of, or not opposed to, a permanent waiver of the “knock and collect” provision of the Billing Standards. The Commission Staff made an additional recommendation that Black Hills’ permanent

waiver be “contingent on the implementation of a customer education campaign and sufficient notification to its customers through bill inserts and website updates”¹.

Black Hills supports the Commission Staff’s recommendation that the Commission grant Black Hills a permanent waiver of the knock and collect provision of the Billing Standards, including the customer education program and notification process. Black Hills, pending Commission approval, proposes including education material on this change in Company procedure to its website and providing a link to these materials to customers that receive their bills electronically. For customers that receive physical bills, a bill insert will be sent that contains the same educational material as the electronic version.

II. DISCONNECTION AND RECONNECTION FEES AS A RESULT OF NONPAYMENT

The issue of reinstating disconnection and reconnection fees to their pre-pilot program levels is a contested issue in this proceeding. Staff has recommended reinstating these fees, while CURB has suggested removing disconnection and reconnection fees in cases of non-payment and to socialize the costs of these fees to prevent undue hardship for low-income customers². Both Atmos and KGS support Staff’s recommendation to reinstate these fees to their pre-pilot levels and contend that any subsidization of these fees be done in the utilities’ next general rate case so that costs are recovered in base rates at the time the fees are eliminated³⁴.

¹ Notice of Filing of Staff’s Report and Recommendation filed November 6, 2024, Docket No. 24-GIMG-453-GIG (“24-453 Docket”)

² The Citizens’ Utility Ratepayer Board Response to Staff’s Report and Recommendation filed November 15, 2024, 24-453 Docket, p. 17-19

³ Atmos Energy Corporation’s Reply to CURB’s Response to Staff’s Report and Recommendation filed November 26, 2024, 24-453 Docket, p. 5

⁴ Kansas Gas Service’s Reply to CURB’s Response to Staff’s Report and Recommendation filed November 27, 2024, 24-453 Docket, p. 6

Black Hills agrees with Atmos and KGS that to the extent the Commission agrees with CURB and decides to socialize certain disconnect and reconnection costs, then it should be done in the Company's next general rate case so that these costs are recovered through base rates.

III. ENERGY INSECURITY

CURB's reply to Staff's R&R includes a request to the Commission to "express strong support for study and work conducted by Kansas utilities, Staff, CURB....to reduce energy insecurity in Kansas." As both Atmos and KGS affirmed in their Replies⁵⁶, Black Hills also supports the continued collaboration between Commission Staff, CURB, and other stakeholders to create effective solutions for energy insecurity in Kansas.

CONCLUSION AND REQUEST FOR COMMISSION ACTION

In conclusion, Black Hills Energy respectfully requests that the Commission grant the permanent waiver of the knock and collect provision for Black Hills Energy, as recommended by Staff, and emphasize that any future adjustments to disconnection and reconnection fees be handled exclusively within the rate case process.

Black Hills remains committed to working collaboratively with CURB, Staff, and all stakeholders to address energy insecurity in Kansas and ensure that customers have access to safe, reliable, and affordable natural gas service.

WHEREFORE, Black Hills Energy respectfully requests that the Commission:

1. Grant a permanent waiver of the knock and collect provision of the Billing Standards for Black Hills; and

⁵ *Id.*, Atmos, p. 6.

⁶ *Id.*, KGS, p. 6-7.

2. Address any adjustments to disconnection and reconnection fees exclusively within general rate cases as decided by the Commission.

Dated this 3rd day of December 2024.

Respectfully submitted,

BLACK HILLS/KANSAS GAS UTILITY COMPANY, LLC

By: /s/ *Douglas J. Law*

Douglas J. Law

Associate General Counsel

KS Bar # 29118

1731 Windhoek Drive

Lincoln, NE 68512

douglas.law@blackhillscorp.com

Counsel for Black Hills/Kansas Gas Utility Company, LLC
d/b/a Black Hills Energy

CERTIFICATE OF SERVICE

24-GIMG-453-GIG

I, the undersigned certify that a true and correct copy of the foregoing was served via electronic service this 3rd day of December, 2024 to the following:

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| James G. Flaherty, Attorney Anderson & Byrd, LLP 216 S. Hickory, PO Box 17 Ottawa, KS 66067 jflaherty@andersonbyrd.com | Shelly M. Bass, Senior Attorney Atmos Energy Corporation 5430 LBJ Freeway 1800 Three Lincoln Centre Dallas, TX 75240 shelly.bass@atmosenergy.com |
| Kathleen R. Ocanas Division VP of Rates & Reg Affairs Atmos Energy Corporation 25090 W. 110 th Terr Olathe, KS 66061 Kathleen.Ocanas@atmosenergy.com | Gerard Weston Atmos Energy Corporation 1555 Blake St, Ste. 400 Denver, CO 80202 Gerard.weston@atmosenergy.com |
| Rob Daniel, Directory of Regulatory Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills Energy 655 East Millsap Road Fayetteville, AR 72703 Rob.Daniel@blackhillscorp.com | Nick Smith, Manager – Regulatory & Finance Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills Energy 601 North Iowa Street Lawrence, KS 66044 Nick.Smith@blackhillscorp.com |
| Rami Alnajjar, Sr. Regulatory Analyst Black Hills/Kansas Gas Utility Company, LLC dba Black Hills Energy 601 North Iowa Street Lawrence, KS 66044 Rami.alnajjar@blackhillscorp.com | Joseph R. Astrab, Attorney Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 Joseph.Astrab@curb.kansas.gov |
| Todd E. Love, Attorney Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 Todd.Love@curb.kansas.gov | David W. Nickel, Consumer Counsel Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 David.Nickel@curb.kansas.gov |

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| <p>Shonda Rabb Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 Shonda.Rabb@curb.kansas.gov</p> | <p>Della Smith Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 Della.Smith@curb.kansas.gov</p> |
| <p>Brian G. Fedotin, General Counsel Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604 Brian.Fedotin@ks.gov</p> | <p>Carly Masenthin, Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604 Carly.Masenthin@ks.gov</p> |
| <p>Susan B. Cunningham SVP/Regulatory & Govt Affairs & Counsel Kansas Electric Power Co-Op, Inc. 600 SW Corporate View PO Box 4877 Topeka, KS 66604-0877 scunningham@kepco.org</p> | <p>Janet Buchanan, Director of Rates & Regulatory Kansas Gas Service, A Division of One Gas, Inc. 7421 W. 129th Street Overland Park, KS 66213 Janet.buchanan@onegas.com</p> |
| <p>Robert E. Vincent, Managing Attorney Kansas Gas Service, A Division of One Gas, Inc. 7421 W. 129th Street Overland Park, KS 66213 Robert.vincent@onegas.com</p> | |

/s/ Douglas J. Law