

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

In the Matter of the Application of Kansas Gas     )  
Service a Division of ONE Gas, Inc. for     )  
Approval by the Commission for a Gas System     )  
Reliability Surcharge per K.S.A. 66-2201     )     Docket No. 19-KGSG-088-TAR  
through 66-2204.     )

**KANSAS GAS SERVICE'S RESPONSE TO  
STAFF'S REPORT AND RECOMMENDATION**

Kansas Gas Service, a division of ONE Gas, Inc. ("KGS" or "Company") responds to Staff's Report and Recommendation as follows:

1. On August 24, 2018, KGS filed its Application for approval to revise its Gas System Reliability Surcharge (GSRS) tariff amount to recover \$57,177,870 in capital costs as permitted under K.S.A. 66-2201 *et. seq.* KGS requested a revenue requirement of \$5,251,239 under this tariff.

2. On August 29, 2018, the Citizens' Utility Ratepayer Board ("CURB") filed a Petition to Intervene in this case which was granted in the Commission's September 18, 2018, Order Granting CURB's Petition to Intervene.

3. On October 24, 2018, Staff filed its Report and Recommendation wherein Staff recommended approval of a revenue requirement of \$5,257,937, an increase of \$6,698 over the Company's request. Staff made adjustments to the revenue estimates included in the application for July and August 2018, that were updated for known information after the filing of the Application. Staff also recommended disallowances of \$72,380 of the total requested capital costs. These disallowances included the cost of the replacement of service lines that were associated with replacements as a result of excavation damages for which KGS was responsible due to mis-locates

or failure to mark lines.

4. Kansas Gas Service has reviewed Staff's Report and Recommendation and agrees to accept the adjustments set forth by Staff in its Report and Recommendation, without waiving its right to raise objection to Staff's recommended treatment of these issues in future GSRS filings. The recommended adjustments to the Company's filing would result in a total GSRS revenue recovery of \$5,257,937. Kansas Gas Service also agrees that the new rates as set forth in Staff's Exhibit 6, of the Memorandum supporting the Report and Recommendation are fair and reasonable. Thus, upon issuance of an Order approving the application (as revised by Staff's adjustments), Kansas Gas Service will file the updated tariff reflecting the new rates.

**WHEREFORE**, Kansas Gas Service requests that the Commission issue an Order approving its Application subject to the revisions of Staff in its Report and Recommendation.

Respectfully submitted,



Judy Jenkins Hitchye, KS #23300

Managing Attorney

Kansas Gas Service, a division of ONE Gas, Inc.

7421 W. 129<sup>th</sup> Street

Overland Park, Kansas 66213-6918

Phone: 913-319-8617

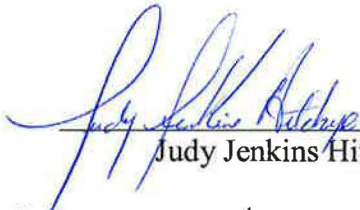
Fax: 913-319-8622

[judy.jenkinshitchye@onegas.com](mailto:judy.jenkinshitchye@onegas.com)


**VERIFICATION**

STATE OF KANSAS                    )  
  )ss:  
COUNTY OF JOHNSON            )

I, Judy Jenkins Hitchye, of lawful age, being first duly sworn upon oath, states as follows: I am a Managing Attorney for Kansas Gas Service, a Division of ONE Gas, Inc. I have read the above *Response to Staff's Report and Recommendation* and all the statements therein are true to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Judy Jenkins Hitchye No. 23300

SUBSCRIBED AND SWORN to before me this 29<sup>th</sup> day of October, 2018.

  
\_\_\_\_\_  
Notary Public

Appointment/Commission Expires: 06/05/2022



**CERTIFICATE OF SERVICE**

I, Judy Jenkins Hitchye, hereby certify that a copy of the above and foregoing *Response to Staff's Report and Recommendation* was forwarded this 29<sup>th</sup> day of October, 2018, addressed to:

THOMAS J. CONNORS, Attorney at Law  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[tj.connors@curb.kansas.gov](mailto:tj.connors@curb.kansas.gov)

TODD E. LOVE, ATTORNEY  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[t.love@curb.kansas.gov](mailto:t.love@curb.kansas.gov)

DAVID W. NICKEL, CONSUMER COUNSEL  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[D.NICKEL@CURB.KANSAS.GOV](mailto:D.NICKEL@CURB.KANSAS.GOV)

SHONDA RABB  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[s.rabb@curb.kansas.gov](mailto:s.rabb@curb.kansas.gov)

DELLA SMITH  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[d.smith@curb.kansas.gov](mailto:d.smith@curb.kansas.gov)

PHOENIX ANSHUTZ, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[p.anshutz@kcc.ks.gov](mailto:p.anshutz@kcc.ks.gov)

JANET BUCHANAN, DIRECTOR- REGULATORY AFFAIRS  
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.  
7421 W 129TH ST

OVERLAND PARK, KS 66213-2713

[janet.buchanan@onegas.com](mailto:janet.buchanan@onegas.com)

JUDY JENKINS HITCHYE, MANAGING ATTORNEY  
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.

7421 W 129TH ST

OVERLAND PARK, KS 66213-2713

[judy.jenkins@onegas.com](mailto:judy.jenkins@onegas.com)



---

Judy Jenkins Hitchye, KS Bar No. 23300

Managing Attorney

KANSAS GAS SERVICE

A Division of ONE Gas, Inc.

7421 West 129<sup>th</sup> Street

Overland Park, Kansas 66213-5957

(913) 319-8615 Phone

(913) 319-8622 Fax

[judy.jenkinshitchye@onegas.com](mailto:judy.jenkinshitchye@onegas.com)