

**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 and) Docket No. 15-GIMX-344-GIV
Natural Gas Billing Standards Related to On-)
Premises Collections.)

KANSAS GAS SERVICE PILOT KNOCK & COLLECT COMPLIANCE REPORT

Kansas Gas Service, a division of ONE Gas, Inc. (“Kansas Gas Service,” or “Company”), in accordance with the Commission’s order in Docket No. 15-GIMX-344-GIV, respectfully submits its semi-annual compliance report as required by the Commission’s July 14, 2020, Order issued in this docket.

1. Kansas Gas Service is a natural gas public utility operating in the state of Kansas pursuant to certificates of convenience and necessity issued by the State Corporation Commission of the State of Kansas (“Commission”). Kansas Gas Service’s principal place of business within the state of Kansas is located at: 7421 West 129th Street, Overland Park, Kansas 66213

2. The names, addresses and phone numbers of persons authorized to receive notices and communications with respect to this Compliance Report on behalf of Kansas Gas Service are as follows:

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3. In accordance with the *Joint Motion to Approve Temporary Waiver* by Commission Staff dated March 7, 2017, the *Joint Recommendation Regarding Continuation of*

Knock and Collect Pilot dated October 31, 2019, and the Commission's *Order Approving Joint Recommendation Regarding Continuation of Knock and Collect Pilot* dated April 21, 2020, issued in this docket, Kansas Gas Service submits the following information:

- a. The number of bills sent out each month.
- b. Number of 10 Day Disconnect Notices by month.
- c. Number of Non-Pay Shut Off Orders by month.
- d. Number of communication attempts at the 5 to 7-day mark by month.
- e. Number of accounts making payments after the 5 to 7-day communication attempt and method of payment by month.
- f. Number of communication attempts at the 48-hour mark by month.
- g. Number of accounts making payments after the 48-hour communication attempt and before the 24-hour communication attempt and method of payment by month.
- h. Number of phone call attempts at the 24-hour mark prior to disconnection by month.
- i. Number of door tags performed by month during the Cold Weather Rule.
- j. Number of accounts making payments after the 24-hour communication attempt and before disconnection and method of payment by month.
- k. Not Applicable.
- l. Number of disconnections by month.
- m. Number of accounts paid for reconnection and method of payment by month.
- n. Distribution of the time between disconnection, payment and reconnection.
- o. The manner in which the utility informed customers of any available bill assistance programs during the reporting period.
- p. Knock and Collect Waiver of On-Premise Collection Customer Survey.
- q. Customer complaints with respect to this pilot program.
- r. Cost savings attributable to this pilot program.

WHEREFORE, Kansas Gas Service, a Division of ONE Gas, Inc., prays the Commission

and its Staff accept this compliance report and for such other relief as the Commission deem just and reasonable.

Respectfully submitted,

/s/ Robert Elliott Vincent

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Knock and Collect Waiver of On-Premise Collection Pilot

Docket No. 15-GIMX-344-GIV

Semi-Annual Compliance Report

April 15, 2024

Overview

On August 17, 2017, the Commission issued an order in Docket No. 15-GIMX-344-GIV, approving a pilot program waiving the knock and collect requirement for the electric utilities Southern Pioneer and Evergy Kansas Central (hereafter referred to as “Pilot Program”). In lieu of amending its Billing Standards, the Commission approved this Pilot Program to evaluate the potential customer benefits and impacts of the approved alternative customer contact methods. On July 14, 2020, the Commission granted a motion for Kansas Gas Service to be made party to the Pilot Program with an effective date of June 19, 2020. Participation in the program allows Kansas Gas Service to replace on-premises collection visits with alternative contact methods during the Pilot Program period. This is Kansas Gas Service, a division of ONE Gas Inc.’s, (“Kansas Gas Service” or “Company”) eighth compliance report for the Pilot Program. This report covers the months of October 2023 through March 2024.

A. Number of Bills Sent Out (By Month):

The table below lists the number of customer bills that Kansas Gas Service issued during each calendar month for the months of October 2023 through March 2024. Please note, the number of customer bills issued will vary from month to month depending on the timing of the issuance of final bills. The following are examples of potential causes of variances:

- A premises (customer location) may see a regular bill and a final bill for one customer account in the same month depending on the date of disconnection.
- A premises may see a final bill for the former customer and an initial bill for the new customer in the same month, e.g., during periods of high utility turnover due to the beginning and/or ending of college semesters; or, activity resulting from the beginning or the ending of the Cold Weather Rule periods.

| Month | Number of Bills |
|---------------|-----------------|
| October 2023 | 701,298 |
| November 2023 | 650,403 |
| December 2023 | 648,102 |
| January 2024 | 705,796 |
| February 2024 | 682,651 |
| March 2024 | 679,348 |

B. Number of 10-Day Disconnect Notices (By Month):

The table below provides a list of the number of 10-day disconnect notices that Kansas Gas Service issued during each calendar month for the months of October 2023 through March 2024.

| Month | 10-Day Disconnection Notices |
|---------------|-------------------------------------|
| October 2023 | 9,869 |
| November 2023 | 9,670 |
| December 2023 | 12,503 |
| January 2024 | 18,236 |
| February 2024 | 18,264 |
| March 2024 | 15,780 |

C. Number of Non-Pay Shut-Off Orders Issued (By Month):

Kansas Gas Service cancels a non-pay shut off order when the customer makes a payment or pay arrangements after the non-pay order was issued. Additionally, the Company cancels a non-pay order in those instances when Kansas Gas Service experiences field personnel shortages in particular areas due to previously scheduled work obligations, availability of personnel due to scheduling issues or at the direction of Kansas Gas Service management. Please note that during the Cold Weather Rule (November 1st through March 31st), residential non-pay shut off orders will not be issued unless the forecasted temperature is 35 degrees or above in the 48-hour period following the scheduled disconnection of service.

| Month | Residential Non-Pay Shut Off Order | Non-Residential Non-Pay Shut Off Order |
|---------------|---|---|
| October 2023 | 1,874 | 80 |
| November 2023 | 1,844 | 71 |
| December 2023 | 2,668 | 90 |
| January 2024 | 6,568 | 200 |
| February 2024 | 7,218 | 271 |
| March 2024 | 7,724 | 326 |

D. Number of Communication Attempted at the 5-7 Day Mark (By Month):

The table below separates the number of communication attempts by phone call, text message or email at the 5 to 7-day mark for customers with an outstanding balance. As directed by the Commission's Order in this docket, Kansas Gas Service is actively gathering preferred method communication data from its customers and will use that information to direct its communication attempts in the future.

| Month | Phone Call | Text Message | Email |
|---------------|-------------------|---------------------|--------------|
| October 2023 | 4,019 | 1,328 | 1,716 |
| November 2023 | 4,258 | 1,401 | 1,702 |
| December 2023 | 5,230 | 1,704 | 2,128 |
| January 2024 | 11,890 | 3,715 | 4,656 |
| February 2024 | 15,532 | 4,423 | 5,817 |
| March 2024 | 16,429 | 4,545 | 6,027 |

E. Number of Accounts Showing Payments Received After the 5-7 Day Communication Attempt and Before the 48-hour Communication Attempt and Methods of Payment:

Pursuant to the Pilot Program requirements, Kansas Gas Service is required to provide a record of the number of payments received between the issuance of the 5 to 7 day and the 48-hour notices. The payment information references all payments received which includes full payments, partial payments and pay agreement payments.

| Payment Method | October 2023 | November 2023 | December 2023 | January 2024 | February 2024 | March 2024 |
|-----------------------|---------------------|----------------------|----------------------|---------------------|----------------------|-------------------|
| ACH/Debit/Credit | 833 | 784 | 763 | 1,821 | 3,439 | 4,099 |
| Bank Draft | 0 | 1 | 1 | 3 | 4 | 2 |
| Energy Assistance | 6 | 2 | 3 | 35 | 35 | 34 |
| Payment Kiosk | 9 | 6 | 6 | 27 | 55 | 48 |
| Lockbox | 37 | 30 | 48 | 123 | 261 | 234 |
| Manual Payment | 2 | 3 | 0 | 3 | 2 | 0 |
| Online Bank/Bill Pay | 7 | 12 | 5 | 23 | 38 | 61 |
| Pay Station | 36 | 32 | 30 | 85 | 131 | 159 |
| Unknown | 0 | 0 | 1 | 1 | 7 | 92 |

F. Number of Communication Attempts at the 48-Hour Mark (By Month):

The table below shows the number of phone call, text message and email attempts for customers with an outstanding balance at the 48-hour mark.

| Month | Phone Call | Text Message | Email |
|---------------|-------------------|---------------------|--------------|
| October 2023 | 3,056 | 960 | 1,230 |
| November 2023 | 3,118 | 922 | 1,135 |
| December 2023 | 3,734 | 1,182 | 1,431 |
| January 2024 | 9,268 | 2,793 | 3,463 |
| February 2024 | 11,170 | 3,019 | 3,891 |
| March 2024 | 12,493 | 3,230 | 4,171 |

G. Number of Accounts Recording Payments After the 48-Hour Communication Attempt and Before the 24-Hour Communication Attempt and Method of Payment (By Month):

Pursuant to the Pilot Program requirements, Kansas Gas Service is required to provide a record of the number of payments received between the issuance of the 48-hour notice and the 24-hour notice. The table below shows the number of customer accounts making payments after receipt of the 48-hour phone call communication attempt. The payments consist of full payments, partial payments and pay agreement payments.

| Payment Method | October 2023 | November 2023 | December 2023 | January 2024 | February 2024 | March 2024 |
|-----------------------|---------------------|----------------------|----------------------|---------------------|----------------------|-------------------|
| ACH/Debit/Credit | 302 | 266 | 250 | 560 | 950 | 1,121 |
| Bank Draft | 2 | 0 | 1 | 1 | 3 | 2 |
| Energy Assistance | 5 | 0 | 3 | 7 | 16 | 10 |
| Payment Kiosk | 9 | 8 | 7 | 7 | 11 | 12 |
| Lockbox | 20 | 23 | 21 | 135 | 92 | 88 |
| Manual Payment | 0 | 0 | 0 | 0 | 1 | 0 |
| Online Bank/Bill Pay | 4 | 1 | 2 | 9 | 11 | 13 |
| Pay Station | 20 | 19 | 13 | 23 | 46 | 58 |
| Unknown | 0 | 0 | 0 | 1 | 21 | 51 |

H. Number of Phone Call Attempts at the 1-Day Mark Prior to Disconnection (By Month):

Pursuant to the Pilot Program requirements, Kansas Gas Service is required to provide a record of the number of communication attempts at the 24-hour mark for customers with an outstanding balance.

| Month | Phone Call | Text Message | Email |
|---------------|-------------------|---------------------|--------------|
| October 2023 | 2,667 | 826 | 1,035 |
| November 2023 | 2,593 | 770 | 944 |
| December 2023 | 3,347 | 1,068 | 1,270 |
| January 2024 | 8,064 | 2,465 | 2,995 |
| February 2024 | 9,690 | 2,650 | 3,364 |
| March 2024 | 11,325 | 2,926 | 3,698 |

I. Number of Door Tags Provided (By Month) During the Cold Weather Rule:

Pursuant to the Pilot Program requirements, Kansas Gas Service is required to provide a record of the number of door tags that were provided during the Cold Weather Rule.

| Month | Meter Total |
|---------------|--------------------|
| October 2023 | 0 |
| November 2023 | 182 |
| December 2023 | 0 |
| January 2024 | 6 |
| February 2024 | 456 |
| March 2024 | 1,238 |

J. Number of Accounts Making Payments After the 24-Hour Communication Attempt and Before Disconnection and Method of Payment:

Pursuant to the Pilot Program requirements, Kansas Gas Service is required to provide a record of the number of payments received following the 24-hour notice.

| Payment Method | October 2023 | November 2023 | December 2023 | January 2024 | February 2024 | March 2024 |
|-----------------------|---------------------|----------------------|----------------------|---------------------|----------------------|-------------------|
| ACH/Debit/Credit | 767 | 662 | 692 | 1,382 | 2,709 | 3,626 |
| Bank Draft | 2 | 8 | 9 | 14 | 13 | 13 |
| Energy Assistance | 14 | 2 | 12 | 34 | 62 | 100 |
| Payment Kiosk | 11 | 8 | 12 | 18 | 32 | 73 |
| Lockbox | 23 | 18 | 16 | 76 | 135 | 176 |
| Manual Payment | 0 | 0 | 2 | 2 | 1 | 0 |
| Online Bank/Bill Pay | 8 | 6 | 6 | 12 | 28 | 55 |
| Pay Station | 50 | 36 | 36 | 95 | 155 | 208 |
| Unknown | 0 | 0 | 3 | 2 | 5 | 188 |

K. Not Applicable.

L. Number of Disconnections (By Month):

The table below reflects the total number of disconnections, by month, due to non-payment for both residential and commercial customers.

| Month | Residential Disconnections | Non-Residential Disconnections |
|---------------|-----------------------------------|---------------------------------------|
| October 2023 | 762 | 28 |
| November 2023 | 80 | 29 |
| December 2023 | 1 | 7 |
| January 2024 | 0 | 42 |
| February 2024 | 170 | 67 |
| March 2024 | 590 | 120 |

M. Number of Customer Accounts Requesting Reconnection (and Method of Payment -By Month):

The table below shows the number of accounts that submitted payment following disconnection and requested reconnection of service. This accounting includes the method of payment.

| Month | October 2023 | November 2023 | December 2023 | January 2024 | February 2024 | March 2024 |
|----------------------|---------------------|----------------------|----------------------|---------------------|----------------------|-------------------|
| ACH/Credit/Debit | 319 | 122 | 24 | 21 | 70 | 170 |
| Bank Draft | 1 | 1 | 0 | 0 | 0 | 0 |
| Energy Assistance | 0 | 2 | 0 | 0 | 0 | 0 |
| Kiosk | 8 | 2 | 1 | 0 | 0 | 3 |
| Lockbox | 2 | 0 | 1 | 2 | 2 | 2 |
| Manual Payment | 0 | 1 | 0 | 0 | 0 | 1 |
| Online Bank/Bill Pay | 0 | 0 | 0 | 0 | 0 | 0 |
| Pay Station | 18 | 8 | 1 | 2 | 7 | 9 |
| Unknown | 0 | 0 | 0 | 0 | 0 | 0 |
| Blank | 42 | 15 | 1 | 5 | 10 | 29 |

N. Distribution of the Time Between Disconnection, Payment and Reconnection:

The table below shows the average time frame between the disconnection of service, the issuance of payment and the reconnection of service.

| Month | Days Between Disconnection & Payment | Days Between Payment & Reconnection |
|---------------|--------------------------------------|-------------------------------------|
| October 2023 | 7 | 2 |
| November 2023 | 25 | 7 |
| December 2023 | 66 | 19 |
| January 2024 | 78 | 11 |
| February 2024 | 18 | 3 |
| March 2024 | 10 | 3 |

O. The Manner in which Kansas Gas Service Informed Customers of Any Available Bill Assistance Programs During the Reporting Period:

Bill Assistance Programs

Kansas Gas Service informs its customers about energy assistance programs in a variety of ways. The Company's Customer Service Representatives are provided ongoing training in the various resources available to assist customers in need. Additionally, Kansas Gas Service provides extensive information on available assistance through multiple online platforms open to both customers and company personnel. This information is kept current and available to customers on the Company's website at <https://www.kansasgasservice.com/save-money/assistance-programs>.

Kansas Gas Service maintains a robust outreach program designed to reach our most at-risk customers and provides them with a means to continue service within their ability to pay. This program includes the employment of Customer Advisors to assist customers directly. Each advisor provides an alternate escalation route for customer contact center employees to refer our most at-risk customers. These Customer Advisors traditionally attend outreach events and take advantage of resource fairs across Kansas to personally contact customers eligible and in need of energy assistance.

Using the resources mentioned above, Kansas Gas Service is confident that it has contacted thousands of Kansans and provided valuable information to aid them with their bills and to ensure they are aware of the resources available to them, and to help them in moments of need.

Media Events

Kansas Gas Service public relations department worked with Kansas Department for Children and Families on bringing awareness of the Low-Income Energy Assistance Program season. Kansas Gas Service also participated in assisting customers with their applications at the first community event in Wichita. Media coverage included KSN television, KRSL and KVOE radio stations as well as the JCPost newspaper from Junction City.

Social Media

Kansas Gas Service informed its customers of financial assistance (energy assistance, payment options, alternate payment plans) availability through social media platforms Facebook, Twitter and Nextdoor.

Kansas Gas Service Website

The Kansas Gas Service website features a revolving link message, “Need Help Paying Your Bill”, “Payment Options for Every Budget”, and a Financial Assistance Program box on the home page to draw attention to the availability of payment arrangements as well as financial resources. In addition, www.kansasgasservice.com/answers is available to address increasing cost of natural gas bills as well as the newly established www.kansasgasservice.com/ratecase that provides links to financial assistance.

Natural Gas Newsletter

The Company included information regarding financial hardship resources and bill assistance in the November and December 2023 as well as the January, February and March 2024 Kansas Gas Service Pipeline customer newsletters.

Helping Hand Letter and Bookmark

Kansas Gas Service distributes a “Helping Hand” letter and bookmark on an individual basis to each customer that experiences a disconnection due to non-payment of the customer’s bill if the customer is located in the top low-income zip codes. The letter directs the customer to the Kansas Gas Service CARES web page for information concerning the availability of financial assistance.

Bill Messaging

Kansas Gas Service included a message during the months of December 2023 and March 2024 regarding payment options, alternative pay agreements and other financial resources that are available by visiting the Kansas Gas Service CARES and Share The Warmth web page.

Bill Insert

Kansas Gas Service included a bill insert during the month of February 2024 that informed customers of the Share The Warmth program.

Field Technician Cards

Kansas Gas Service field technicians have been provided with informational cards advising customers of the 2024 Rate Review. The cards include a QR code that links to www.kansasgasservice.com/ratecase webpage that hosts links to financial assistance.

P. Knock and Collect Waiver of On-Premises Collection Customer Survey:

In February 2024, Kansas Gas Service concluded its eighth customer survey required in the Knock and Collect & Waiver docket. The Company's goal was to survey 400 customers in the third survey. At the conclusion of the survey period, Kansas Gas Company ultimately surveyed 447 of its customers. The Kansas Gas Service Survey Script used is as follows:

Kansas Gas Service is committed to safe business practices for our customers and employees. In order to reduce transmission of COVID-19, Kansas Gas Service is part of a pilot program that is not collecting payments at the door on the day the customer is scheduled to be disconnected due to non-payment. Instead, Kansas Gas Service is providing additional communication to the customer in advance of disconnection and have reduced our disconnection and reconnection fees.

The survey results (as provided below) shows that 18.79% of Kansas Gas Service customers surveyed are aware of the change in policy of collecting payment at the door, prior to disconnection for non-pay. Likewise, of the 447 customers surveyed, 6.94% of them indicated that they had been negatively impacted by the change while 79.64% of customers indicated that they have not been impacted. These results are also presented in the charts below:

| Q1: Are you aware of these changes made to knock and collect procedures? | | |
|---|-------------|---------|
| February 2024 | Q1 Response | % Total |
| Yes | 84 | 18.79% |
| No | 363 | 81.21% |
| Total | 447 | 100.00% |

| Q2: How much have you been impacted by this change to knock and collect procedures? | | |
|--|-------------|---------|
| February 2024 | Q2 Response | % Total |
| Not Impacted | 356 | 79.64% |
| Somewhat Impacted | 60 | 13.42% |
| Negatively Impacted | 31 | 6.94% |

| | | |
|-------|-----|---------|
| Total | 447 | 100.00% |
|-------|-----|---------|

Further, when asked questions regarding the payment methods, 87.70% of those surveyed indicated that the Kansas Gas Service payment options are meeting their needs and 8.05% of customers responded with indication that their payment needs were not being met. The question and responses are provided as follows:

Although Kansas Gas Service does not collect payments at the door prior to disconnecting service, we offer a variety of other payment methods, including online bill payment, pay by phone, automatic payments, pay stations and pay by mail.

| Q3: How would you rate Kansas Gas Service's payment options? | | |
|---|-------------|---------|
| February 2024 | Q3 Response | % Total |
| Completely Meets My Needs | 392 | 87.70% |
| Somewhat Meets My Needs | 19 | 4.25% |
| Doesn't Meet My Needs | 36 | 8.05% |
| Total | 447 | 100.00% |

Q. Customer Complaints Regarding the Knock and Collect Waiver Pilot Program:

Kansas Gas Service has received one customer complaint regarding its participation in the Pilot Program between the months of October 2023 through March 2024.

R. Cost Savings Attributable to the Knock and Collect Waiver Pilot Program

Because Kansas Gas Service is unable to disconnect remotely, it is still required to make physical trips to disconnect, reconnect and to perform requisite safety checks. Therefore, any potential cost savings experienced during this time period is de minimis.

VERIFICATION

STATE OF KANSAS)
) ss
COUNTY OF JOHNSON)

Robert Vincent of lawful age, being first duly sworn upon oath, deposes and states:
That she is an attorney for Kansas Gas Service, a Division of ONE Gas, Inc.; that he has
read the above and foregoing *Compliance Filing* and that the statements therein contained
are true according to her knowledge, information and belief.


Robert Elliott Vincent

Subscribed and sworn before me this 15th day of April, 2024.


Notary Public

My Appointment Expires: 6/5/26



CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing *Compliance Filing* was forwarded this 15th day of April 2024, addressed to:

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