

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

In the Matter of a General Investigation to)
Fully Investigate the Parameters and)
Intricacies of a Customer Opt-Out) Docket No. 19-GIME-012-GIE
Program for Advanced Metering)
Infrastructure Digital Electric Meters.)

CURB'S INITIAL COMMENTS

COMES NOW, The Citizens' Utility Ratepayer Board ("CURB") and submits its initial comments pursuant to the schedule set forth in the State Corporation Commission of the State of Kansas ("Commission") *Order Adopting Proposed Procedural Schedule* ("Procedural Schedule") issued in this docket¹, and states as follows:

I. CURB's Initial Comments

1. CURB analyzed Commission Staff's four parameters recommended for review and comment, those parameters are as follows:

- a. The types of meters that would be preferred in a meter opt-out program;
- b. The installation costs associated with each meter type and/or billing strategy;
- c. The operating costs associated with each meter type and/or billing strategy; and
- d. The effects of economy of scale on the costs of an opt-out program.²

After a careful analysis, CURB determined that those four parameters are best answered by the utilities that have entered an appearance in this docket given that CURB does not have access to the necessary information to weigh in on those specific parameters for the purposes of initial comments. However, CURB reserves the right to respond to any arguments or information filed

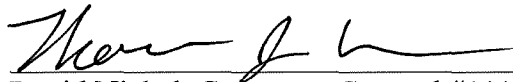
¹ See Order Adopting Proposed Procedural Schedule (October 16, 2018).

² *Id.* at p. 3.

by parties in their initial comments for the purposes of reply comments, which the Commission has provided for in its Procedural Schedule in this docket.³

WHEREFORE, CURB respectfully submits its Initial Comments for the Commission's review and consideration and such other relief as the Commission deems just and proper.

Respectfully submitted,



David Nickel, Consumer Counsel #11170

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Todd E. Love, Attorney #13445

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³ *Id.*

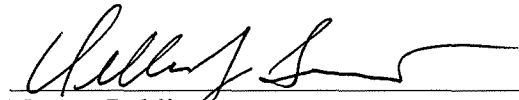
VERIFICATION

STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

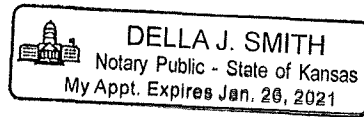
I, Thomas J. Connors, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge,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


Thomas J. Connors

SUBSCRIBED AND SWORN to before me this 16th day of November, 2018.


Notary Public

My Commission expires: 01-26-2021.



CERTIFICATE OF SERVICE

19-GIME-012-GIE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 16th day of November, 2018, to the following:

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