

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

In the Matter of Southern Pioneer Electric)
Company, Regarding Violation of the)
Commission's Minimum Standards for) Docket No. 18-SPEE-428-SHO
Payment Methods for Utility Bills by)
Charging Its Customers a Convenience Fee)
to Submit Bill Payment via Electronic)
Check.)

**RESPONSE OF SOUTHERN PIONEER ELECTRIC COMPANY TO
ORDER TO SHOW CAUSE**

Southern Pioneer Electric Company, ("Southern Pioneer"), pursuant to the April 11, 2018 *Order to Show Cause* (the "Show Cause Order") of the State Corporation Commission of the State of Kansas ("Commission" or "KCC"), hereby files its response.

I. Background

1. Southern Pioneer is a Kansas Corporation not-for-profit utility with its principal place of business located in Ulysses, Kansas and distribution and customer service offices in Liberal and Medicine Lodge, Kansas. Southern Pioneer is regulated by the Commission and is a wholly owned subsidiary of Pioneer Electric Cooperative, Inc., a not-for-profit Kansas member-owned electric cooperative not subject to Commission regulation for ratemaking purposes.

2. Southern Pioneer was granted public utility status on November 21, 2013, when the Commission approved the transfer of the retail certificated territory, consumers, Rules and Regulations, and tariffs from Mid-Kansas Electric Company, Inc. to Southern Pioneer in Docket No. 13-MKEE-447-MIS (the "13-447 Docket").

3. On December 8, 2017, Southern Pioneer filed an Application in Docket No. 18-SPEE-241-TAR (the "18-241 Docket"), seeking a waiver from the Commission's Minimum

Standards and proposed revisions to its Schedule of Fees related to the elimination of the assessment of the \$3.95 convenience fee for bill payments made by credit card. Through discovery requests in the 18-241 Docket proceeding, Commission Staff discovered that Southern Pioneer was charging a \$3.95 convenience fee for bill payments made via e-Check.

4. On March 27, 2018, Commission Staff submitted a Report and Recommendation to the Commission, indicating Southern Pioneer may be acting in violation of the Commission's Minimum Standards for Payment Methods for Utility Bills and Allowing the Acceptance of Credit Cards (the "Minimum Standards") by charging a convenience fee to customers who make bill payments via electronic check ("e-Check").¹ Staff states that Southern Pioneer has not been granted a waiver allowing it to charge a convenience fee for bill payments made by e-Check, and such a fee is not provided in the Southern Pioneer's Schedule of Fees in Southern Pioneer's Rules and Regulations.² Therefore, Southern Pioneer has inappropriately charged over \$85,000 in convenience fees for bill payment via e-Check from 2015-2017.³ Staff recommended the Commission issue an Order to Show Cause to determine whether Southern Pioneer is in violation of the Commission's Minimum Standards by charging its customers a convenience fee to submit bill payments via e-Check.⁴

II. Response

5. Southern Pioneer states that that it has been charging a \$3.95 convenience fee for bill payments made via e-Check since April 2012. Southern Pioneer was not aware that it may not be in compliance with the Commission's Minimum Billing Standards until Commission Staff

¹ Staff Report and Recommendation, p. 2.

² Id.

³ Id.

⁴ Id. at p. 3.

contacted Southern Pioneer on March 15, 2018 to inquire whether Southern Pioneer charged a convenience fee for e-Checks and whether Southern Pioneer had received a waiver to do so.

6. Southern Pioneer agrees with Commission Staff that charging a \$3.95 convenience fee for bill payments made by online e-Checks is not provided for in Southern Pioneer's Schedule of Fees in Southern Pioneer's Rules and Regulations.⁵ However, Southern Pioneer believed that the requisite waiver had been received by Mid-Kansas Electric Company, Inc. ("Mid-Kansas") in 2012. Mid-Kansas was the certificated retail electric service provider for the customers located in the Southern Pioneer Division at such time. Mid-Kansas, as the certificate holder, was responsible for receiving the necessary approvals from the Commission to allow Southern Pioneer to bill the \$3.95 Convenience Fee to retail customers located in the Southern Pioneer Division pursuant to the Retail Electric Service Agreement between Mid-Kansas and Southern Pioneer.

7. Upon review of Southern Pioneer's files and inquiry with Mid-Kansas, Southern Pioneer understands that in 2012, Mid-Kansas submitted to the Commission Executive Director a cover letter requesting approval of the Southern Pioneer Division proposed bill insert to provide notice to customers on different options for bill payment, per the Commission's Minimum Standards (J)(9), and in accordance with the Commission Order in Docket No. 04-GIMX-651-GIV. Enclosed with the letter was the proposed Southern Pioneer bill insert ("Proposed Bill Insert") which expressly stated that when paying a customer bill online using an e-Check or debit/credit card, a \$3.95 convenience fee would be assessed for each transaction up to \$500. A copy of the cover letter and Proposed Bill Insert is attached hereto and incorporated herein as Exhibit A.

⁵ Southern Pioneer's Rules and Regulations, Index R&, Section K – Schedule of Fees Section, #7 – Bill Payment, provides that Southern Pioneer will charge a \$3.95 convenience fee for each credit card transaction, but it does not address e-checks. This schedule was inherited from Aquila-WPK as part of the 2007 Mid-Kansas-Aquila asset purchase.

8. Southern Pioneer understands that the Cover Letter and Proposed Bill Insert were forwarded to Commission Staff for review and comment. In an email obtained by Southern Pioneer from Mid-Kansas, dated February 23, 2012, Staff identified three concerns in its review of the proposed Bill Insert, none of which involved concern over the stated \$3.95 transaction fee for e-Checks. This email between Commission Staff and Mid-Kansas is attached hereto and incorporated herein as Exhibit B. Staff's concerns with the Proposed Bill Insert are summarized as follows:

- The closing paragraph states that all five options represent Southern Pioneer's authorized pay agents, yet the payment by mail, Option #2, is not the equivalent of the "Authorized Pay Agent."
- Payment Option #1 lists three office locations for in-person bill payment, yet a report submitted in Docket No. 06-GIMX-679-GIV lists only one office location.
- Payment Option #5 mentions Kiosks available at office locations but clarification is needed as to whether the company has Kiosks at locations other than its business offices, as well as providing who the authorized agent is in the case of Kiosk stations.

9. Southern Pioneer was not involved in any of the subsequent discussions between Commission Staff and Mid-Kansas regarding Commission Staff's identified concerns with the Proposed Bill Insert, but Southern Pioneer was aware that a mark-up of the Proposed Bill Insert was exchanged between Commission Staff and Mid-Kansas. The only modification made to the Proposed Bill Insert was the last paragraph of the insert to address authorized pay agents and list "Pay by Mail" as an exception. A copy of the marked up Proposed Bill Insert is attached hereto and incorporated herein as Exhibit C. There was again no identified concern or requested change

by Commission Staff to the section of the Proposed Bill Insert stating that a \$3.95 convenience fee would be assessed for the customer's payment of the bill online by e-Check.

10. On March 29, 2012, Mid-Kansas submitted to Commission Staff by formal cover letter a final updated bill insert to reflect the Commission Staff's recommendations, attached hereto and incorporated herein as Exhibit D. This final bill insert ("Final Bill Insert") as approved by Commission Staff clearly indicates the online e-Check payment option and associated \$3.95 convenience fee charge. Southern Pioneer began billing the \$3.95 convenience fee for e-Check transactions upon receiving the approved Final Bill Insert from Mid-Kansas.

11. Southern Pioneer asserts that it was charging the \$3.95 convenience fee for online e-Check transactions under the good faith belief that Mid-Kansas had received the requisite waiver from the Commission upon receiving notification from Mid-Kansas that the Final Bill Insert had been approved which expressly provided for the \$3.95 convenience fee for online e-Check transactions. Southern Pioneer was not aware that a waiver had not been received from the Commission or that it was in violation of the Minimum Billing Standards as now asserted by Commission Staff. Southern Pioneer understood by way of the Commission's approval of the Final Bill Insert that it was appropriately charging the \$3.95 convenience fee for bill payments made by online e-Check. If it is determined by the Commission that there is a violation of the Minimum Billing Standards, such a violation was unintentional and merely an oversight or inadvertence by Southern Pioneer in ensuring Mid-Kansas had received the requisite waiver.

12. To the extent the Commission determines Southern Pioneer does not have in place an appropriate waiver of its Schedule of Fees for bill payments under its Rules and Regulations authorizing Southern Pioneer to charge the \$3.95 convenience fee for bill payments made by e-Check, Southern Pioneer requests the Commission grant such a waiver in the instant docket.

WHEREFORE, Southern Pioneer hereby respectfully requests the Commission find Southern Pioneer appropriately relied on the Commission's approval of the Final Bill Insert as a waiver of its Schedule of Fees for bill payments under its Rules and Regulations allowing it to charge the \$3.95 convenience fee for e-checks beginning in April 2012; or alternatively, to the extent the Commission instead determines Southern Pioneer is inappropriately charging the \$3.95 convenience fee for e-Checks, the Commission grant Southern Pioneer a waiver of its Schedule of Fees for bill payments in its Rules and Regulations to allow Southern Pioneer to appropriately charge the \$3.95 convenience fee for e-Check transactions.

Respectfully submitted,

/s/ Lindsay A. Campbell

Lindsay A. Campbell (#23276)
Executive Vice President – General Counsel
Southern Pioneer Electric Company
P.O. Box 430
Ulysses, Kansas 67880
(620) 424-5206 telephone
(620) 356-4306 facsimile
lcampbell@pioneerelectric.coop

**ATTORNEY FOR SOUTHERN
PIONEER ELECTRIC COMPANY**

CERTIFICATE OF SERVICE

I do hereby certify that on the 10th day of May, 2018, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing Response with a copy emailed to the below parties of record.

lsl Lindsay A. Campbell

THOMAS J. CONNORS, Attorney at Law
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
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

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

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
s.rabb@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

PHOENIX ANSHUTZ, LITIGATION ATTORNEY
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
p.anshutz@kcc.ks.gov

BRIAN G. FEDOTIN, DEPUTY GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
b.fedotin@kcc.ks.gov

AMBER SMITH, CHIEF LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
a.smith@kcc.ks.gov



February 20, 2012

Via: UPS # 1Z2635WF0393496220

Patrice Petersen-Klein
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

Re: Docket No. 04-GIMX-651-GIV

Dear Ms. Petersen-Klein:

Enclosed for the Commission's review, per the Minimum Standards (J)(9), is Southern Pioneer Electric Company's (SPEC) proposed bill insert to provide notice to customers on the different options for bill payment.

SPEC would like the insert to go out to their customers on March 25th, and they will also be posting the information in authorized pay centers and on their website.

If you have any questions concerning this information, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Donald L. Gulley". The signature is written in a cursive style.

Donald L. Gulley
Senior Manager, Regulatory Relations and Billing
(785) 623-6630
dgulley@sunflower.net

DLG/rkb

Encl. 1

c. Jeff McClanahan, KCC, via email
Mid-Kansas Records

At Southern Pioneer Electric Company, we offer many ways to pay your electric bill.

We think the best way to pay your bill is the way that works best for you.

***Five ways to pay,
the choice is all yours!***



1 Pay at our Office Locations

To pay a paper bill in person, visit at any of our 3 office locations:

Liberal Office

1490 General Welch Boulevard
Liberal, KS 67901
620.624.7433

Medicine Lodge Office

113 North Main
Medicine Lodge, KS 67104
620.886.5100

Ulysses Corporate Office

1850 W Oklahoma
Ulysses, KS 67880
800.670.4381

2 Pay By Mail

To pay a paper bill by mail

- Please include your Southern Pioneer Electric bill payment stub and a check or money order in the self addressed envelope
- Allow time for postal delivery by the due date.

3 Pay By Phone

To pay your bill by phone, anytime

- Call 1-866-999-4505 anytime, 24/7
- Use your checking account or valid Visa, MasterCard, or Discover debit/credit card
- There is a \$3.95 convenience fee charge for each transaction up to \$500.00

4 Automatic Bank Draft

Your payment is on time, every month

- Payment is automatically deducted from your checking or savings account
- No convenience fees to pay, stamps to buy or checks to write
- Contact our local office by calling 1-800-670-4381 or our website www.southernpioneer.net to sign up for automatic bank draft

5 Pay Online or Kiosk

To pay your bill online, anytime

- Access 24/7 at www.southernpioneer.net
- Use an e-check or valid Visa, MasterCard, or Discover debit/credit card
- There is a \$3.95 convenience fee charge for each transaction up to \$500.00

Kiosk stations are available at all office locations

- Use a valid Visa, MasterCard or Discover debit/credit card
- There is a \$3.95 convenience fee charge for each transaction up to \$500.00

These five payment options are Southern Pioneer's authorized pay agents. All other payment options are considered "Unauthorized Pay Agents". Unauthorized Pay Agents have no contractual requirement with Southern Pioneer Electric Company to operate under rules approved by the Kansas Corporation Commission (KCC). Southern Pioneer Electric provides no assurance as to the timeliness or accuracy of payments made via unauthorized agents.

EXHIBIT B

From: ["Gulley, Don" <Don>](#)
To: [Braun](#)
[Renee](#);
CC:
Date: 3/14/2012 6:48:38 PM
Subject: Re: Status? Mid-Kansas submission for Southern Pioneer bill insert

I am intentionally waiting on KCC approval of WHM-12 before contacting Elena. It is on my to do list but only after we clear that first hurdle.

Don Gulley
Sent from my iPhone

On Mar 14, 2012, at 6:17 PM, "Braun, Renee" <rbraun@sunflower.net> wrote:

Where are we at on this?

From: Braun, Renee [<mailto:rbraun@sunflower.net>]
Sent: Friday, March 02, 2012 5:09 PM
Subject: RE: FYI - Mid-Kansas submission for Southern Pioneer bill insert

I don't know what protocol is on something like this – whether we wait to hear from Jesse on the “issues” Elena has addressed or if we need to address them with SPEC.

From: Gulley, Don
Sent: Friday, March 02, 2012 1:45 PM

EXHIBIT B

To: Braun, Renee
Subject: FW: FYI - Mid-Kansas submission for Southern Pioneer bill insert

Here you go...I haven't digested any of it yet. Let me know if there is something I need to address.

.....

Don Gulley
Sunflower Electric Power Corp.
T 785.623.6630

C 785.259.6055

.....

From: Elena Kanaeva-Larson [<mailto:e.larson@kcc.ks.gov>]
Sent: Thursday, February 23, 2012 2:02 PM
To: Jesse Borjon; Gulley, Don
Cc: Jeff McClanahan; Robert Glass; Steve Boyd; Greta Stephens; Gerrie Lippert
Subject: FW: FYI - Mid-Kansas submission for Southern Pioneer bill insert

Don,

Thank you for your submittal. I have reviewed the document and am forwarding my evaluation to our Public Affairs and Consumer Protection Director for follow up.

Jesse,

EXHIBIT B

The attached document, the Annual Notice to Customers, was submitted to the Utilities Division on behalf of the Southern Pioneer Electric Company. I have reviewed the document and am providing the comments/evaluation for your review and further discussions with the Company (see below). I was informed by the prior Rate Design staff that since this document represents direct communication between Company and its customers, PACP office has been responsible for any follow up + customer information/education as needed per such Company's annual submissions. Please, let me know if you have any further questions/comments. Sincerely, - Elena

What: Southern Pioneer Electric Company (SPEC) Annual Notice to its customers

Submitted under: 04-GIMX-651-GIV/KCC-approved Minimum Standards For Payment Methods for Utility Bills/Section (J)(9)

Reason: SPEC will be inserting this document in the mailings/bills to their customers beginning March 25, as well as for info posting @ their authorized pay centers + on their website.

Concerns:

The Annual Notice document, closing paragraph, states that all 5 options represent SPEC's authorized pay agents. Yet the Payment by Mail, Option #2, although accepted method by the utility + free of charge, is not an equivalent of the "Authorized Pay Agent" à Post Office is not SPEC's agent, and the bill isn't considered received/paid once mailedà only once it is received by the utility (see quote below):

KCC Minimum Standards For Payment Methods For Utility Bills Section (J)(5) "For purposes of determining whether payment has been made, all utility authorized pay centers and authorized vendor/agents shall be considered to be agents of the utility, and payments made to such agents shall be treated the same as if paid directly to the utility".

Pay Option #1 lists 3 office locations for in-person bill payment (Ulysses, Liberal and Medicine Lodge). Yet the report submitted under 06-GIMX-679-GIV (Jurisdictional Authorized Walk-in Pay Stations Annual Compliance Report/2012) lists only 1 Business Office location for SPEC = Ulysses, KS. This inconsistency needs to be explained and/or reconciled.

Payment Option #5 mentions Kiosks available at all office locations. Need to clarify whether the Company has kiosks at locations other than its business offices, plus who is the Authorized Agent is in the case of Kiosk stations.

EXHIBIT B

From: Jeff McClanahan
Sent: Tuesday, February 21, 2012 3:16 PM
To: Robert Glass; Elena Kanaeva-Larson
Subject: FW: FYI - Mid-Kansas submission for Southern Pioneer bill insert

I assume this is required (under billing standards?) so I'm passing it along as an FYI. Please let me know if this needs to be reviewed and receive a formal okay.

From: Braun, Renee [<mailto:rbraun@sunflower.net>]
Sent: Monday, February 20, 2012 4:42 PM
To: Jeff McClanahan
Subject: FYI - Mid-Kansas submission for Southern Pioneer bill insert

Mr. McClanahan,

Don Gulley asked me to provide a courtesy copy of our February 20, 2012 letter and submission on behalf of Southern Pioneer regarding their proposed bill insert for payment options. The original is being sent via UPS to the KCC and should arrive tomorrow (2/21).

If you have any questions or concerns, please let us know.

EXHIBIT B

Reneé K. Braun | Corporate Services Legal Assistant

Sunflower Electric Power Corporation | 301 W. 13th; P.O. Box 1020 | Hays, KS 67601

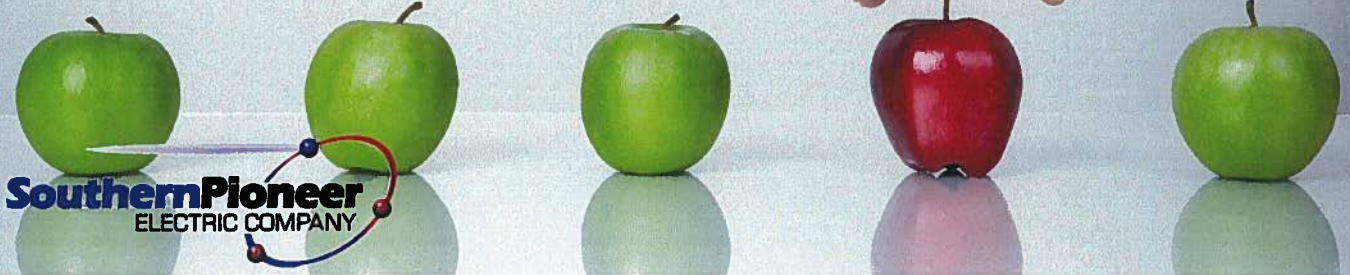
Telephone: (785) 623-3302 | Email: rbraun@sunflower.net

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Ulysses, KS 67880
800.670.4381

2 Pay By Mail

To pay a paper bill by mail

- Please include your Southern Pioneer Electric bill payment stub and a check or money order in the self addressed envelope
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3 Pay By Phone

To pay your bill by phone, anytime

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5 Pay Online or Kiosk

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Kiosk stations are available at all office locations

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With the exception of number 3, Pay By Mail,
+ These five payment options are Southern Pioneer's authorized pay agents. All other payment options are considered "Unauthorized Pay Agents". Unauthorized Pay Agents have no contractual requirement with Southern Pioneer Electric Company to operate under rules approved by the Kansas Corporation Commission (KCC). Southern Pioneer Electric provides no assurance as to the timeliness or accuracy of payments made via unauthorized agents.



March 29, 2012

Via: US Mail

Jesse Borjon
Director of Communications
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604

Re: Docket No. 04-GIMX-651-GIV

Dear Mr. Borjon:

Enclosed please find a copy of Southern Pioneer Electric Company's (SPEC) bill insert, which was updated to reflect KCC Staff recommendations. This copy is for your records.

Sincerely,

A handwritten signature in blue ink that reads "Renee K. Braun". The signature is written in a cursive, flowing style.

Renee K. Braun
Corporate Paralegal, Supervisor
Telephone: (785) 623-3302
rbraun@sunflower.net

Encl. 1

- c. Randy Magnison, via e-mail
- Rae Gorman, via e-mail
- Mid-Kansas Records

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