

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

JOINT APPLICATION

Atmos Energy Corporation ("Atmos Energy") and Kansas Gas Service, a Division of ONE Gas, Inc. ("Kansas Gas Service") (collectively, "Gas Utilities") file this Joint Application requesting an order from the Kansas Corporation Commission ("Commission") granting a permanent waiver to the Commission's Electric and Natural Gas Utility Billing Standards ("Billing Standards") to allow for a discontinuance of the knock and collect requirement prior to disconnecting of utility service. In support of their Joint Application, the Gas Utilities state as follows:

1. On February 4, 2021, the Commission issued an order in Docket No. 15-GIMX-344-GIV ("344 Docket") granting Evergy Kansas Central and Southern Pioneer permanent waivers of the knock and collect requirement of the Commission's Billing Standards. The Commission allowed the Gas Utilities on an interim basis to continue their then current practice of substituting the physical interaction between employees and customers required under the knock and collect provisions of the Commission's Billing Standards with additional notices by phone and text messages which provided customers a link to allow them to pay their delinquent bills electronically. The Commission also allowed the Gas Utilities to seek a permanent waiver of the knock and collect requirement by filing an application for such in a separate docket after conferring with the Commission Staff ("Staff") and the Citizens' Utility Ratepayer Board ("CURB").

2. As part of their participation in the 344 Docket, Atmos Energy and Kansas Gas Service submitted semi-annual compliance filings setting forth data collected from customers related to the pilot program. They also submitted results from customer surveys relating to the pilot program. The Gas Utilities request that the semi-annual compliance filings and customer survey reports filed in the 344 Docket be referred into this new docket by reference.

3. Per the representations made in the 344 Docket, removal of the knock and collect procedure results in the following that do not serve the interests of either the utility or the customer:

(a) It removes any embarrassment which may occur for customers when a Gas Utility employee attempts to collect an outstanding bill at their door prior to disconnection;

(b) it reduces the risk for scam artists or imposters to take advantage of customers; and

(c) it eliminates field situations where an employee's life has been threatened and required law enforcement involvement.

The Commission also recognized in its order that nearby states do not require attempted collection in person before service is disconnected and that on-premises collection of past-due amounts is not universally required by other state public utility commissions.

4. The Gas Utilities propose to substitute the physical interaction between employees and customers with the additional notices by phone and text messages that were instituted as part of the 344 Docket pilot program. Those additional notices provide customers a link which allows customers to pay delinquent bills electronically and provides a reasonable substitution to the payment option provided under the knock and collect process.

5. Per the Commission's order in the 344 Docket, the Gas Utilities have met with Staff and CURB to discuss the permanent waiver of the knock and collect requirement prior to disconnection and the replacement of that requirement with the additional notices by phone, text messages and email (and the link to the electronic payment options) that were instituted as part of the 344 Docket pilot program. The provisions discussed with Staff and CURB were as follows and were separated for disconnections during non-cold weather rule months (April 1 - October 31) and cold weather rule months (November 1 - March 31):

(a) During non-cold weather rule months (April 1 - October 31):

(1) Ten (10) days prior to disconnection, the utility shall send Customer a disconnection notice which shall be effective upon mailing and shall be effective for one month after the initial date upon and after which Natural Gas Service can be disconnected. The utility shall maintain an accurate record of the date of mailing and the effective dates of the invoice.

(2) Five (5) to Seven (7) days prior to disconnection, the utility shall attempt to contact the Customer via the Customer's preferred choice of contact (phone call, text message, electronic mail), informing the Customer of the utility's intent to disconnect and include a link to electronic payment options available for the Customer to pay its bills.

(3) Two (2) days prior to the disconnection, the utility shall attempt to contact the Customer via a phone call, informing the Customer of the utility's intent to disconnect and include a link to electronic payment options available for the Customer to pay its bills.

(4) One (1) day prior to disconnection, the utility shall attempt to contact the Customer via the Customer's preferred choice of contact, informing the Customer of the utility's intent to disconnect and include a link to electronic payment options available for the Customer to pay its bills.

(5) The utility may then disconnect service on the day of disconnection.

(6) The utility shall not be required to make an on premise collection attempt or leave a disconnect message on the Customer's door.

(b) During cold-weather rule months (November 1 - March 31):

(1) Ten (10) days prior to disconnection, the utility shall send Customer a disconnection notice which shall be effective upon mailing and shall be effective for one month after the initial date upon and after which Natural Gas Service can be disconnected. The utility shall maintain an accurate record of the date of mailing and the effective dates of the invoice.

(2) Five (5) to Seven (7) days prior to disconnection, the utility shall attempt to contact the Customer via the Customer's preferred choice of contact (phone call, text message, electronic mail), informing the Customer of the utility's intent to disconnect and include a link to electronic payment options available for the Customer to pay its bills.

(3) Two (2) days prior to the disconnection, the utility shall attempt to contact the Customer via a phone call, informing the Customer of the utility's intent to disconnect and include a link to electronic payment options available for the Customer to pay its bills.

(4) One (1) day prior to disconnection, the utility shall attempt to contact the Customer via the Customer's preferred choice of contact, informing the Customer of the utility's intent to disconnect and include a link to electronic payment options available for the Customer to pay its bills. If the attempted phone contact is not successful the utility shall place a disconnect message at the Customer's premise on the day prior to disconnection and include a link to electronic payment options available for the Customer to pay its bills. If the attempted phone contact is successful, the utility shall not be required to place a disconnect message at the Customer's premises on the day prior to the disconnection.

(5) The utility may then disconnect service on the day of disconnection unless otherwise prohibited by the cold weather rule.

(6) The utility shall not be required to make an on premise collection attempt.

The other provisions contained in the Billing Standards relating to disconnections would remain unchanged.

6. Per the Commission's Order, the Gas Utilities also discussed with Staff and CURB potential solutions to address the energy burden facing many low-income Kansans. The Gas Utilities

discussed the possibility of proposing in their next general rate cases an alternative residential rate design option that adjusts the amount recovered in the facility or customer charge and the amount recovered in the commodity charge and explained how that could assist both low-income customers who are on fixed incomes and actively attempt to reduce their usage to lower their gas bills and low-income customers who are not able to reduce their usage due to the age and/or lack of adequate insulation of their residence can lower their gas bills. The Gas Utilities also discussed the possibility of proposing energy efficiency programs for Commission approval to assist low-income customers.

7. Section VI of the Billing Standards provides the procedures for requesting a waiver.

It states that:

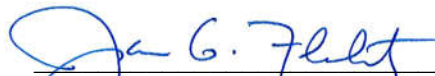
The requirements contained in these standards may be waived in individual cases by the Commission upon written request by the utility and by showing that compliance with the requirement would not serve the interests of either the utility or the customer.

The Gas Utilities participation in the previous Commission-approved pilot shows that the practice of substituting the physical interaction between employees and customers with the additional notices by phone, text or email, which included a link that allowed customers to pay delinquent bills electronically, has proven to be beneficial for both the utilities and their customers. For the reasons set forth in paragraph 3 of this Application, which were all recognized in the Commission's Order, mandated interaction between the utility's employees and customers on the day of disconnection does not serve the interest of either the utility or the customer. Eliminating the physical interaction on the day of disconnection and replacing it with additional customer notices, including notices using the customer's preferred method of notification, and providing the customer a link to where he or she can pay their bill electronically, removes any embarrassment which may occur for customers when a Gas Utility employee attempts to collect an outstanding bill at their door prior to disconnection. It will also

reduce the risk for scam artists or imposters to take advantage of customers. It will eliminate situations where an employee's life has been threatened and required law enforcement involvement and other on premise incidents. In addition, the results of the customer surveys done during the current pilot program period indicate a positive view of the utilities' procedures during the pilot period.

8. The Gas Utilities are requesting that the above-mentioned changes to the Billing Standards be approved on a permanent basis without the requirement for a new pilot program. Their participation in the current pilot program and the results of that participation are sufficient to warrant approval of changes proposed in this Application on a permanent basis and without the need for a second pilot program.

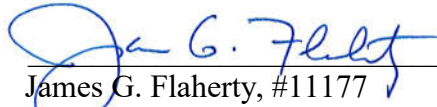
WHEREFORE, the Gas Utilities request that the Commission issue an order approving their Application and granting such further relief as the Commission deems appropriate.



James G. Flaherty, #11177
ANDERSON & BYRD, LLP
216 S. Hickory ~ P.O. Box 17
Ottawa, Kansas 66067
(785) 242-1234, telephone
(785) 242-1279, facsimile
jflaherty@andersonbyrd.com

Shelly M. Bass, Associate General Counsel
Atmos Energy Corporation
5430 LBJ Freeway, 1800 Three Lincoln Centre
Dallas, Texas 75240
(972) 855-3756, telephone
(972) 855-3080, facsimile
shelly.bass@atmosenergy.com

Attorneys for Atmos Energy Corporation



James G. Flaherty, #11177
ANDERSON & BYRD, LLP
216 S. Hickory ~ P.O. Box 17
Ottawa, Kansas 66067
(785) 242-1234, telephone
(785) 242-1279, facsimile
jflaherty@andersonbyrd.com

Robert Elliott Vincent, #26028
KANSAS GAS SERVICE
7421 West 129th Street
Overland Park, Kansas 66213-2634
(913) 319-8615, telephone
(913) 319-8622, facsimile
robert.vincent@onegas.com

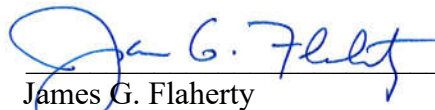
Attorneys for Kansas Gas Service,
a Division of ONE Gas, Inc.

VERIFICATION

STATE OF KANSAS
COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states:

That he is the attorney for the Gas Utilities, named in the foregoing Joint Application and is duly authorized to make this affidavit; that he has read the foregoing and knows the contents thereof; and that the facts set forth therein are true and correct.


James G. Flaherty

SUBSCRIBED AND SWORN to before me this 15th day of December, 2023.





Notary Public

Appointment/Commission Expires: