In the Matter of the Application of)	
Kansas Gas Service, A Division)	
of ONE Gas, Inc. for Approval By)	DOCKET NO. 20-KGSG ^{.090} -TAR
The Commission for a Gas)	
System Reliability Surcharge per)	
K.S.A. 66-2201 through 66-2204)	

DIRECT TESTIMONY

OF

LORNA M. EATON

ON BEHALF OF

KANSAS GAS SERVICE

A DIVISION OF ONE GAS, INC

DIRECT TESTIMONY

OF

LORNA M. EATON

KANSAS GAS SERVICE

DOCKET NO. 20-KGSG-___-TAR

ı	Q.	PLEASE STATE TOUR NAME AND BUSINESS ADDRESS.
2	A.	My name is Lorna M. Eaton. My business address is 7421 West 129th Street, Overland
3		Park, Kansas, 66213.
4	Q.	BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?
5	A.	I am employed by Kansas Gas Service, a Division of ONE Gas, Inc. ("KGS" or the
6		"Company"), as a Manager in the Rates and Regulatory Department.
7	Q.	PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND BUSINESS
8		EXPERIENCE.
9	A.	I received a Bachelor of Science in Geology from Kansas State University in 1996 and
0		worked in the KSU Geology department following graduation. I began my employment
1		with KGS in 2000, as an Accountant in the General Accounting Department and moved
2		to the Financial Planning Department as a Budget Analyst. I joined the Rates and
3		Regulatory Department in 2010 as a Rates Analyst and began my current position in
4		June 2015.
5	Q.	HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?
6	A.	Yes. I provided written testimony in Dockets 12-KGSG-835-RTS, 14-KGSG-111-TAR,
7		15-KGSG-088-TAR, 16-KGSG-104-TAR, 16-KGSG-491-RTS, 18-KGSG-093-TAR,
8		18-KGSG-560-RTS ("560 Docket"), and 19-KGSG-088-TAR ("088 Docket").

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Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

- A. The purpose of my testimony is to support the calculation of the Gas System Reliability

 Surcharge ("GSRS") revenue requirement, the allocation of relevant costs to customer

 classes, the development and design of GSRS rates, and the revised GSRS tariff rider.
- 5 Q. ARE YOU SPONSORING ANY EXHIBITS?

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6 A. Yes. I am sponsoring Exhibits LME-1 through LME-7.

7 Q. PLEASE EXPLAIN THE APPLICABLE GSRS REVENUE RATE PARAMETERS 8 CONTAINED IN THE GSRS STATUTE.

K.S.A. 66-2203 provides parameters for GSRS filings. Pursuant to this statute, the Commission may not approve a GSRS filing if it would produce annualized revenues below the lesser of \$1,000,000 or ½% of the most recent base revenue approved in the utility's most recent general rate proceeding. The most recent general rate proceeding for KGS was the 560 Docket, referenced above. The base revenue authorized for Kansas Gas Service in the 560 Docket was \$318,875,695, resulting in a GSRS in a ½% threshold of \$1,594,378. Thus, the minimum statutory floor for KGS in a GSRS filing until KGS's next general base rate proceeding is completed is \$1,000,000. Exhibit LME-1 establishes the KGS Revenue Requirement at \$4,228,101, thus meeting the minimum threshold.

Similarly, the maximum annualized GSRS revenues contemplated by the statute are capped at 20% of the most recent base revenue approved in the utility's most recent general rate proceeding. Based on the outcome of the 560 Docket, the GSRS recovery 'ceiling' for Kansas Gas Service is currently \$63,775,139. Again, the requested GSRS revenue falls well within the parameters established in the statute. Further, K.S.A. 66-2204 provides a 'rate' ceiling of \$0.80 per month, per filing, by which the residential GSRS rate may increase in any GSRS filing. Exhibit LME-6 sets forth

2		ceiling of \$0.80 per month.
3	Q.	WERE ANY OF THE COSTS INCLUDED WITHIN THIS GSRS REQUEST
4		CONTAINED IN RATE BASE WITHIN THE 560 DOCKET?
5	A.	No.
6	Q.	PLEASE IDENTIFY THE ASPECTS OF THE GSRS CALCULATION.
7	A.	The GSRS application contains the following elements:
8		1. Calculation of the over/under recovery of the previously authorized GSRS
9		revenue, based upon actual GSRS revenue recorded through January 2019;
10		2. The inclusion of system investment projects and government relocation
11		expenditures placed in service after September 1, 2018 and unitized during the
12		period September 1, 2018 through June 30, 2019. KGS witness Mr. Anthony
13		Cellitti will discuss these projects;
14		3. The inclusion of blanket work orders involving the replacement of service lines,
15		mains, and meters placed in service and unitized during the period between
16		September 1, 2018 and June 30, 2019; and
17		4. The inclusion of corporate allocated cyber security projects that were placed in
18		service after September 1, 2018 and unitized between September 1, 2018 and
19		June 30, 2019. KGS witness Mr. Niyo Pearson will discuss these projects.
20	Q.	COULD YOU PLEASE EXPAND ON THE CUTOFF DATE USED TO DETERMINE
21		GSRS ELIGIBLE PROJECTS?
22	A.	Projects included in this filing were those that were both in service and unitized prior
23		to closing the Company's plant accounting records in June 2019. "Unitization," as
24		used in this filing, refers to the accounting process by which project costs are
25		accumulated and amounts are assigned to FERC accounts. Due to the accounting

the incremental residential GSRS charge of \$0.43 per month, which is below the

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tasks necessary to finalize a project, the unitization date occurs after a project is actually in service.

Q. PLEASE PROVIDE AN EXPLANATION OF EXHIBIT LME-1.

A. Exhibit LME-1 summarizes the components of the GSRS Revenue Requirement calculation. The calculation methods and components are consistent with those required in K.S.A. 66-2204 sections (d)(1) through (8). As shown on Line 11, the total GSRS Revenue Requirement is \$4,228,101. The revenue requirement identified in Exhibit LME-1 incorporates all the aspects of the GSRS calculation as discussed above.

10 Q. HOW DID YOU DETERMINE THE CARRYING CHARGE FOR CALCULATING THE 11 GSRS REVENUE REQUIREMENT?

A. The Stipulated Settlement Agreement approved by the Commission in the 560 Docket sets forth the provisions for the carrying charge to be applied to recoverable investments for KGS's GSRS filing. This return of 9.0984% was used in the calculation of the revenue requirement, as shown on Exhibit LME-1.

16 Q. PLEASE EXPLAIN THE PURPOSE OF EXHIBIT LME-2.

A. Exhibit LME-2 summarizes the authorized GSRS revenue approved by the

Commission in the 088 Docket compared to the actual revenues generated from

December 2018 through January 2019. As shown on Line 9, of Exhibit LME -2, the

revenue recovered from KGS' GSRS charge exceeds the authorized GSRS recoveries

by \$14,324. The over-recovery is used to reduce the proposed GSRS charges as

shown on Line 10 of LME-1.

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Q. PLEASE EXPLAIN EXHIBIT LME-3.

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2 A. Exhibit LME-3 identifies the GSRS Gross and Net Plant in Service by FERC account for GSRS eligible expenditures, further classified by category of GSRS expenditure. GSRS eligible projects are identified in K.S.A. 66-2202 sections (f)(1) through (5) and are discussed in greater detail in the testimonies of Company witness Mr. Cellitti and Company witness Mr. Pearson. Column (B) identifies the proposed GSRS 7 expenditures that relate to allocated cyber security projects, Column (C) identifies and proposed safety and governmental relocation projects, and Column (D) identifies the proposed blanket GSRS expenditures. The Accumulated Depreciation of \$472,331 associated with this filing is shown in column (E) and Column (F) identifies the Net GSRS plant by FERC account of \$36,504,036.

12 CAN YOU PLEASE DESCRIBE WHAT YOU MEAN BY "ALLOCATED CYBER Q. 13 **SECURITY PROJECTS"?**

K.S.A. 66-2202 section (f)(4) allows for the inclusion of system security costs including allocated corporate costs. KGS is including cyber security investments that are described in Mr. Pearson's testimony within the GSRS filing that were incurred at the corporate level. The plant in service included in Column (B) on exhibit LME-3 reflect only KGS's portion of the total investment.

19 PLEASE SUMMARIZE EXHIBIT LME-4. Q.

20 A. Exhibit LME-4 identifies the Accumulated Depreciation of \$472,331 identified by FERC 21 Account and Accumulated Deferred Income Taxes of \$2,563,243 associated with 22 Kansas Gas Service's GSRS capital expenditures. The Accumulated Deferred 23 Income Tax ("ADIT") balance represents the liability associated with GSRS investment 24 that is used to reduce GSRS Rate Base.

Q. PLEASE EXPLAIN EXHIBIT LME-5.

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A. Exhibit LME-5 sets forth the calculation of annualized Depreciation Expense associated with GSRS plant, split between allocated cyber security, safety and government relocation projects, and blanket service line. As shown on line 40 of the Exhibit, the annualized Depreciation Expense is \$1,097,729.

6 Q. PLEASE EXPLAIN EXHIBIT LME-6.

Exhibit LME-6 allocates the GSRS revenue requirement to Kansas Gas Service's customer classes as provided for in the agreed upon Stipulation in the 560 Docket as required in the statute. Specifically, the GSRS Revenue Requirement is allocated to each class based upon the proportion of its Pro-Forma revenue to total Pro-Forma revenue as defined in Appendix B, of the Stipulation and Agreement approved in the 560 Docket. The revenue requirement by class is then divided by the number of billing determinants for each class as defined in that same Appendix, to establish the monthly rates.

As shown in column G, the proposed monthly fixed rates by customer class are as follows:

GSRS Proposed Rates						
Customer Class	Monthly Fixed Rate					
RS – Residential Sales	\$0.43					
GSS – General Sales Small	\$0.65					
GSL – General Sales Large	\$1.58					
GSTE – General Sales Transport Eligible	\$5.27					
SGS – Small Generator Sales	\$0.71					
GIS – Gas Irrigation Sales	\$1.71					
STk Small Transportation Service "k" system	\$3.63					
STt – Small Transportation Service "t" system	\$4.05					
GITt – Gas Irrigation Transportation Service "t" system	\$3.67					
LVTk – Large Volume Transportation Service "k" system Tier 1	\$8.99					
LVTk – Large Volume Transportation Service "k" system Tier 2	\$19.80					
LVTk – Large Volume Transportation Service "k" system Tier 3	\$35.19					
LVTk – Large Volume Transportation Service "k" system Tier 4	\$156.38					
LVTt –Large Volume T Transportation Service "t" system Tier 1	\$17.02					
LVTt –Large Volume T Transportation Service "t" system Tier 2	\$27.99					
LVTt –Large Volume T Transportation Service "t" system Tier 3	\$46.95					
LVTt –Large Volume T Transportation Service "t" system Tier 4	\$328.41					
WT - Wholesale Transportation Service	\$57.39					
SSR – Sales Service for Resale	\$13.49					
CNGk – Compressed Natural Gas Transportation Service	\$20.03					
CNGt – Compressed Natural Gas Transportation Service	\$37.14					
KGSSD – Kansas Gas Supply D	\$27.88					

- 1 Q. WHAT IS THE PURPOSE OF EXHIBIT LME-7?
- 2 A. Exhibit LME-7 is the GSRS tariff page, revised to reflect the recalculated rates.
- 3 Q. DOES THIS CONCLUDE YOUR TESTIMONY?
- 4 A. Yes.

VERIFICATION

STATE OF KANSAS)	
)	SS
COUNTY OF JOHNSON)	

Lorna M. Eaton, being duly sworn upon her oath, deposes and states that she is Manager, Rates and Regulatory Department for Kansas Gas Service, a Division of ONE Gas, Inc.; that she has read and is familiar with the foregoing Direct Testimony filed herewith; and that the statements made therein are true to the best of her knowledge, information, and belief.

Lorna M. Eaton

Subscribed and sworn to before me this 2 day of August 2019.

NOTARY PUBLIC

My appointment Expires:

04/05/22



Gas System Replacement Surcharge

Exhibit LME-1

(A)			(B)		(C)		(D)		(E)	(F)
Line No.	Summary	Corporate Allocated Cyber Security		ed Cyber Govt. Relocation			GSRS Blanket Work Orders		Grand Total	Source
1 2	Original Cost Less: Accumulated Depreciation	\$ \$	104,561 (4,843)		14,071,052 (161,738)		23,423,134 (305,749)		37,598,746 (472,331)	Schedule LME-3 Schedule LME-4
3	Net Plant in Service	\$	99,718	\$	13,909,313	\$	23,117,385	\$	37,126,416	
4	Less: Accumulated Deferred Income Taxes	\$	(917)	\$	(148,653)	\$	(2,413,673)	\$	(2,563,243)	Schedule LME-4
5	Net GSRS Rate Base	\$	98,801	\$	13,760,660	\$	20,703,711	\$	34,563,173	
6	Carrying Charge (1)		9.0984%		9.0984%		9.0984%		9.0984%	
7	Pre-Tax Required Return	\$	8,989	\$	1,252,000	\$	1,883,706	\$	3,144,696	Line 5 * Line 6
8	Depreciation Expense	\$	10,328	\$	334,952	\$	752,449	\$	1,097,729	Schedule LME-5
9	GSRS Revenue Requirement (Annual)							\$	4,242,425	Line 7 + 8
10	Plus (Minus): Over-Recovered Balance from Docket No. 18-KGSG-093-TAR							\$	(14,324)	Schedule LME-2
11	Revised GSRS Annualized Revenue Requirement							\$	4,228,101	Line 9 + 10

⁽¹⁾ Carrying Charge of 9.0984% gross of tax was established in Docket 18-KGSG-560-RTS.

Kansas Gas Service A Division of ONE Gas

Gas System Reliability Surcharge

Exhibit LME-2

GSRS Over/Under Cumulative Recovery for 2018-2019

(A)

		(71)
Line		CSDS Decoveries
No.		GSRS Recoveries
1	September-November 2018 Estimate from 19-KGSG-088-TAR	\$715,908
2	September-November 2018 GSRS Recoveries	\$710,364
3	True-Up Actual/Estimate for 2018	(\$5,544)
4	December 2018 Recoveries	\$445,991
5	January 2019 Recoveries	\$450,199
	·	
6	Total Cumulative GSRS Recoveries	\$890,647
7	2019 GSRS Rev. Requirement	\$5,257,937
8	2/12 of 2019 GSRS Rev. Requirement (Dec-Jan)	\$876,323
9	Total Amount Over Recovered through January 2019	\$14,324

Gas System Reliability Surcharge

Plant in Service

		(A)	(B)	(C)	(D)	(E)	(F)
Line No.	Account	Account Title	GSRS Projects Corporate Allocated Cyber Security	GSRS Projects Safety and Govt. Relocation	GSRS Blanket Work Orders	Less: Accumulated Depreciation	Net Plant
1	367	Mains		2,691,624		34,232	2,657,391
2	368	Compressor Station Equipment		23,787		442	
3	369	Meas. And Reg. Station Equipment		98,169		1,235	
4	374.2	Rights of Way		·		-	-
5	376	Mains - Plastic		7,353,101		91,460	7,261,641
6	376.5	Mains - Metallic		1,901,073		17,956	1,883,117
7	376.9	Mains - Cathodic Protection		165,440	909,917	30,377	1,044,980
8	378	Meas. and reg. sta. equip general		177,571		2,110	175,460
9	379	Meas. and reg. sta. equip city gate		12,599		104	12,494
10	380	Services - Plastic		1,086,188	14,315,043	224,504	15,176,727
11	380.5	Services - Metallic		3,612		(31,360)	34,972
12	381	Meters		130,322	8,198,174	91,387	8,237,109
13	381.5	AMR Communication Devices				-	
14	382	Meter installations		8,217		109	8,108
15	383	House Regulators		12,152		116	12,036
16	390.1	Structures and Improvements		375,266		3,158	
17	391.6	Purchased Software	85,980			3,140	
18	391.8	Computer Equipment	18,581			1,703	
19	397	Communication Equipment		31,932		1,656	
20		Total	\$ 104,561	\$ 14,071,052	\$ 23,423,134	\$ 472,331	\$ 36,504,036

Exhibit LME-3

Gas System Reliability Surcharge

Exhibit LME-4

Accumulated Depreciation and Accumulated Deferred Income Tax Liability

Accumulated Depreciation

		(A)	(B)	(C)	(D)	(E)	
_	Account Number	Account	GSRS Projects Corporate Allocated Cyber Security	GSRS Projects Safety and Govt. Relocation	GSRS Blanket Work Orders	Total Accumulated Depreciation	
1	367	Mains	1	24 222		6 24.222	
1				34,232		\$ 34,232	
2	368	Compressor Station Equipment		442		\$ 442	
3	369	Meas. And Reg. Station Equipment		1,235		\$ 1,235	
4	374.2	Rights of Way		24.462		\$ -	
5	376	Mains - Plastic		91,460		\$ 91,460	
6	376.5	Mains - Metallic		17,956		\$ 17,956	
7	376.9	Mains - Cathodic Protection		4,823	25,554	\$ 30,377	
8	378	Meas. and reg. sta. equip general		2,110		\$ 2,110	
9	379	Meas. and reg. sta. equip city gate		104		\$ 104	
10	380	Services - Plastic		12,149	212,355	\$ 224,504	
11	380.5	Services - Metallic		(8,585)	(22,775)	\$ (31,360)	
12	381	Meters		771	90,616	\$ 91,387	
13	381.5	AMR Communication Devices				\$ -	
14	382	Meter installations		109		\$ 109	
15	383	House Regulators		116		\$ 116	
16	390.1	Structures and Improvements		3,158		\$ 3,158	
17	391.6	Purchased Software	3,140			\$ 3,140	
18	391.8	Computer Equipment	1,703			\$ 1,703	
19	397	Communication Equipment	,	1,656		\$ 1,656	
20		Total	\$ 4,843	\$ 161,738	\$ 305,749	\$ 472,331	

Accumulated Deferred Income Tax Liability

		(A)	(B)	(C)	(D)	(E)
			GSRS Projects			
			Corporate	GSRS Projects		
Line			Allocated Cyber	Safety and Govt.	GSRS Blanket	
No.			Security	Relocation	Work Orders	Total ADIT
1	Total		\$ (917)	\$ (148,653)	\$ (2,413,673)	\$ (2,563,243)

Gas System Reliability Surcharge

Exhibit LME-5

Depreciation Expense

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Total

		GSRS Projects Corporate Allocated Cyber Security (A)	(B)	(C)	(D)	(E)	(F)
Line	Account		GSRS Gross	Less: GSRS	Net Depreciable	Depreciation	Annualized
No.	Number	Account	Additions	Retirements	GSRS Plant	Rate	Depreciation
						•	
1	391.6	Purchased Software	85,980	-	85,980	7.69%	6,61
2	391.8	Computer Equipment	18,581	-	18,581	20.00%	3,71
3		Total	104,561	-	104,561		10,32
		CCDC Desired Coffee and Control Delivery					
		GSRS Projects Safety and Govt. Relocation (A)	(B)	(C)	(D)	(E)	(F)
Line	Account	(A)	GSRS Gross	Less: GSRS	Net Depreciable	Depreciation	Annualized
No.	Number	Account	Additions	Retirements	GSRS Plant	Rate	Depreciation
4	367	Mains	2,691,624	(156,339)	2,535,285	2.38%	60,34
5	368	Compressor Station Equipment	23,787	(1,473)	22,314	3,53%	78
6	369	Meas. And Reg. Station Equipment	98,169	(6,437)	91,732	3.18%	2,91
7	374.2	Rights of Way	-	(0,157)		1.45%	2,7.
8	376	Mains - Plastic	7,353,101	(59,438)	7,293,663	2,66%	194.01
9	376.5	Mains - Metallic	1,901,073	(301,319)	1,599,754	2.46%	39,35
10	376.9	Mains - Cathodic Protection	165,440	-	165,440	6.67%	11,03
11	378	Meas. and reg. sta. equip general	177,571	(7,220)	170,350	2.44%	4,15
12	379	Meas. and reg. sta. equip city gate	12,599	(4,400)	8,199	2.13%	17
13	380	Services - Plastic	1,086,188	(303,425)	782,764	3.69%	28,88
14	380.5	Services - Metallic	3,612	(410,681)	(407,069)	4.63%	(18,84
15	381	Meters	130,322	-	130,322	2.84%	3,70
16	381.5	AMR Communication Devices	-	-	-	6.67%	-
17	382	Meter installations	8,217	(1,547)	6,670	3.20%	21
18	383	House Regulators	12,152	(1,832)	10,320	1.97%	20
19	390.1	Structures and Improvements	375,266	-	375,266	1.57%	5,89
20	397	Communication Equipment	31,932	-	31,932	6.67%	2,13
21		Total	14,071,052	(1,254,111)	12,816,941		334,95
		GSRS Blanket Work Orders				and the same	
							(F)
		(A)	(B)	(C)	(D)	(E)	
Line	Account	• • • • • • • • • • • • • • • • • • • •	GSRS Gross	Less: GSRS	Net Depreciable	Depreciation	Annualized
Line No.	Account Number	Account					
No.	Number	Account	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant	Depreciation Rate	Annualized Depreciation
No.	Number 367	Account Mains	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant	Depreciation Rate	Annualized Depreciation
No. 22 23	367 368	Account Mains Compressor Station Equipment	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant	Depreciation Rate 2.38% 3.53%	Annualized Depreciation
No. 22 23 24	367 368 369	Account Mains Compressor Station Equipment Meas. And Reg. Station Equipment	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant - -	2.38% 3.53% 3.18%	Annualized Depreciation - - -
22 23 24 25	367 368 369 374.2	Account Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant	2.38% 3.53% 3.18% 1.45%	Annualized Depreciation
22 23 24 25 26	367 368 369 374.2 376	Account Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant	2.38% 3.53% 3.18% 1.45% 2.66%	Annualized Depreciation
No. 22 23 24 25 26 27	367 368 369 374.2 376 376.5	Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic Mains - Metallic	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant	2.38% 3.53% 3.18% 1.45% 2.66% 2.46%	Annualized Depreciation
22 23 24 25 26 27 28	367 368 369 374.2 376 376.5 376.9	Account Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic Mains - Metallic Mains - Cathodic Protection	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant	2.38% 3.53% 3.18% 1.45% 2.66% 2.46% 6.67%	Annualized Depreciation
22 23 24 25 26 27 28 29	367 368 369 374.2 376 376.5 376.9	Account Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic Mains - Metallic Mains - Cathodic Protection Meas. and reg. sta. equip general	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant	Depreciation Rate 2.38% 3.53% 3.18% 1.45% 2.66% 2.46% 6.67% 2.44%	Annualized Depreciation
22 23 24 25 26 27 28 29 30	367 368 369 374.2 376 376.5 376.9 378	Account Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic Mains - Metallic Mains - Cathodic Protection Meas. and reg. sta. equip general Meas. and reg. sta. equip city gate	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant	2.38% 2.38% 3.53% 3.18% 2.66% 2.46% 6.67% 2.244% 2.13%	Annualized Depreciation
22 23 24 25 26 27 28 29 30 31	367 368 369 374.2 376 376.5 376.9 378 379 380	Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic Mains - Metallic Mains - Cathodic Protection Meas. and reg. sta. equip general Meas. and reg. sta. equip city gate Services - Plastic	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant 909,917 - 14,315,042.57	2.38% 3.53% 3.18% 1.45% 2.66% 2.46% 6.67% 2.44% 2.13% 3.69%	Annualized Depreciation
22 23 24 25 26 27 28 29 30 31 32	367 368 369 374.2 376 376.5 376.9 378 379 380 380.5	Account Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic Mains - Cathodic Protection Meas. and reg. sta. equip general Meas. and reg. sta. equip city gate Services - Plastic Services - Metallic Services - Metallic	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant 909,917 14,315,042.57 (1,235,283)	Depreciation Rate 2.38% 3.53% 3.18% 1.45% 2.66% 2.46% 2.44% 2.13% 3.69% 4.63%	Annualized Depreciation
22 23 24 25 26 27 28 29 30 31 32 33	367 368 369 374.2 376 376.5 376.9 378 379 380 380 380.5	Account Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic Mains - Metallic Mains - Cathodic Protection Meas. and reg. sta. equip general Meas. and reg. sta. equip city gate Services - Plastic Services - Metallic Meters	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant 909,917 - 14,315,042.57	Depreciation Rate 2.38% 3.53% 3.18% 2.66% 2.46% 6.67% 2.44% 2.13% 3.69% 4.63% 2.84%	Annualized Depreciation
No. 22 23 24 25 26 27 28 29 30 31 32 33 34	Number 367 368 369 374.2 376 376.5 376.9 378 379 380 380.5 381 381.5	Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic Mains - Metallic Mains - Cathodic Protection Meas. and reg. sta. equip general Meas. and reg. sta. equip city gate Services - Plastic Services - Metallic Meters AMR Communication Devices	GSRS Gross Additions	Less: GSRS Retirements (1,235,283) (426,119)	Net Depreciable GSRS Plant 909,917 14,315,042,57 (1,235,283) 7,772,055	2.38% 3.53% 3.18% 1.45% 2.66% 2.46% 6.67% 2.13% 3.69% 4.63% 2.84% 6.67%	Annualized Depreciation
22 23 24 25 26 27 28 29 30 31 32 33 34 35	367 368 369 374.2 376 376.5 378.9 380 380.5 381.5 382	Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic Mains - Metallic Mains - Cathodic Protection Meas. and reg. sta. equip general Meas. and reg. sta. equip city gate Services - Plastic Services - Metallic Meters AMR Communication Devices Meter installations	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant 909,917 14,315,042.57 (1,235,283) 7,772,055	Depreciation Rate 2.38% 3.53% 3.18% 1.45% 2.66% 2.46% 6.67% 2.13% 4.63% 4.63% 2.84% 6.67% 3.20%	Annualized Depreciation
No. 22 23 24 25 26 27 28 29 30 31 32 33 34	Number 367 368 369 374.2 376 376.5 376.9 378 379 380 380.5 381 381.5	Mains Compressor Station Equipment Meas. And Reg. Station Equipment Rights of Way Mains - Plastic Mains - Metallic Mains - Cathodic Protection Meas. and reg. sta. equip general Meas. and reg. sta. equip city gate Services - Plastic Services - Metallic Meters AMR Communication Devices	GSRS Gross Additions	Less: GSRS Retirements	Net Depreciable GSRS Plant	2.38% 3.53% 3.18% 1.45% 2.66% 2.46% 6.67% 2.13% 3.69% 4.63% 2.84% 6.67%	Annualized Depreciation

40 Total Depreciation Expense 1,097,729

23,423,134

(1,661,403)

21,761,731

752,449

Kansas Gas Service A Division of ONE Gas

Gas System Reliability Surcharge Development of GSRS Rate

Exhibit LME-6

(A)		(A) (B) (C)		(D)	(E)	(F)	(G)	
				GSRS Revenue				
				Requirement (Based	Customers Per - 18-			
		Pro-Forma Revenue -	% of Revenue	upon ratio of pro-	KGSG-560-RTS			
Line		Docket No. 18-KGSG-560-	Requirement	forma revenue to total		GSRS Annual		S Monthly
No.	Customer Class	RTS	Responsibility	revenue)	Appendix B	Charge		harge
1	Residential Sales RS	\$ 228,136,718	71.544%	3,024,957	583,049	\$ 5.19	\$	0.43
2	General Sales Svc. Small	21,561,638	6.762%	285,894	36,896	\$ 7.75	\$	0.65
3	General Sales Svc. Large	16,644,462	5.220%	220,696	11,621	\$ 18.99	\$	1.58
4	General Sales Svc. Transport Eligible	2,383,361	0.747%	31,602	500	\$ 63.20	\$	5.27
5	Small Generator Sales SGS	431,454	0.135%	5,721	676	\$ 8.46	\$	0.71
6	Gas Irrigation Sales GIS	331,827	0.104%	4,400	214	\$ 20.56	\$	1.71
7	Small Transportation STk	11,498,231	3.606%	152,460	3,497	\$ 43.60	\$	3.63
8	Small Transportation STt	4,441,906	1.393%	58,897	1,211	\$ 48.64	\$	4.05
9	Gas Irrigation Transportation GITt	1,705,800	0.535%	22,618	513	\$ 44.09	\$	3.67
10	Large Volume Transportation LVTk Tier 1 #	1,750,052	0.549%	23,205	215	\$ 107.93	\$	8.99
11	Large Volume Transportation LVTk Tier 2 #	1,684,737	0.528%	22,339	94	\$ 237.64	\$	19.80
12	Large Volume Transportation LVTk Tier 3 #	1,496,729	0.469%	19,846	47	\$ 422.25	\$	35.19
13	Large Volume Transportation LVTk Tier 4 #	8,916,005	2.796%	118,221	63	\$ 1,876.52	\$	156.38
14	Large Volume Transportation LVTt Tier 1 #	693,253	0.217%	9,192	45	\$ 204.27	\$	17.02
15	Large Volume Transportation LVTt Tier 2 #	785,386	0.246%	10,414	31	\$ 335.93	\$	27.99
16	Large Volume Transportation LVTt Tier 3 #	637,325	0.200%	8,451	15	\$ 563.37	\$	46.95
17	Large Volume Transportation LVTt Tier 4 #	13,969,184	4.381%	185,223	47	\$ 3,940.92	\$	328.41
18	Wholesale Transportation WT t #	1,454,338	0.456%	19,284	28	\$ 688.70	\$	57.39
19	Sales Service for Resale SSR	97,657	0.031%	1,295	8	\$ 161.86	\$	13.49
20	CNG k system	163,179	0.051%	2,164	9	\$ 240.41	\$	20.03
21	CNG t system	67,219	0.021%	891	2	\$ 445.64	\$	37.14
22	Kansas Gas Supply D	25,235	0.008%	335	1	\$ 334.60	\$	27.88

23	Total	\$ 318,875,695	100% \$	4,228,101

24 1) Note: Residential Class Limited to annual increase of \$.80/month over the most recent GSRS filing.

		Annual Increase		Cumulative Rate	
25	2019 GSRS Rate - Residential	\$	0.43	\$	0.43
26	Total Residential Rate			\$	0.43

27 # Includes flex revenue.

THE STATE CORPORATION COMMISSION OF KANSAS

Index 44.1

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

SCHEDULE GSRS

All Rate Areas Replacing Sheet 1 Filed November 8, 2018 February 5, 2019

No supplement or separate understanding shall modify the tariff as shown herein.

Sheet 1 of 2

Gas System Reliability Surcharge Rider

Availability

This rider is applicable to every bill for service provided under each of the Company's sales and transportation rate schedules except where not permitted under a separately negotiated contract with a customer. Not applicable to bills for As-Available Gas Sales Service or Interruptible Gas Transportation Service.

Net Monthly Charge

The Gas System Reliability Surcharge (GSRS) shall be a fixed monthly amount calculated as the applicable GSRS times the number of meters serving the customer's account, as indicated by the total number of Service Charges billed.

RS GSS GSL GSTE SGS KGSSD GIS SSR	Residential Sales Service General Sales Service Small General Sales Service Large General Sales Service Transport Eligible Small Generator Sales Service Kansas Gas Supply D Gas Irrigation Sales Service Sales Service Resale	\$ \$ \$ \$ \$ \$	0.000.43 0.000.65 0.001.58 0.005.27 0.000.71 0.0027.88 0.001.71 0.0013.49
STk STt	Small Transportation Service (k) Small Transportation Service (t)	\$ \$	0.00 <u>3.63</u> 0.00 <u>4.05</u>
LVTk Annual Use:	Large Volume Transportation Service (k) Below 10,000 Mcf 10,001 Mcf – 20,000 Mcf 20,001 Mcf – 40,000 Mcf Above 40,001 Mcf	\$ \$ \$ \$	0.008.99 0.0019.80 0.0035.19 0.00156.38
LVTt Annual Use:	Large Volume Transportation Service (t) Below 10,000 Mcf 10,001 Mcf – 20,000 Mcf 20,001 Mcf – 40,000 Mcf Above 40,001 Mcf	\$ \$ \$ \$	0.0017.02 0.0027.99 0.0046.95 0.00328.41
WTt GITt CNGk CNGt	Wholesale Transportation Service (t) Gas Irrigation Transportation Service (t) Compressed Natural Gas General Transportation (k) Compressed Natural Gas General Transportation (t)	\$ \$ \$	0.00 <u>57.39</u> 0.00 <u>3.67</u> 0.00 <u>20.03</u> 0.00 <u>37.14</u>

Issued:	February 5, 2019	18 KGSG-560-RTS
Effective:	February 6, 2019	Approved
Ву:	/S/	Kansas Corporation Commission February 5, 2019 /S/ Lynn Retz
	Janet L. Buchanan, Director – Regulatory Affairs	

THE STATE CORPORATION COMMISSION OF KANSAS

Index 44.2

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

SCHEDULE **GSRS**

All Rate Areas Replacing Sheet 2 Filed November8, 2018 February 5, 2019

No supplement or separate understanding shall modify the tariff as shown herein.

Sheet 2 of 2

Gas System Reliability Surcharge Rider

Definitions and Conditions

- 1. The provisions of this GSRS Rider are intended to recover charges for natural gas public utility plant projects pursuant to K.S.A. 66-2201 through K.S.A. 66-2204.
- 2. The GSRS shall be reflected on a customer's bill as a separate line item.
- 3. The Annual Use for customers served under a Large Volume Transportation (LVT) rate schedule shall be the total volumes billed to the applicable meter in the 12 months ending the most recent April 30. Company may rely on estimated historical usage or projected volumes to establish Annual Use when actual usage is not available
- 4. At the end of each twelve-month calendar period a GSRS is in effect, Company shall reconcile the difference between the revenues resulting from that GSRS and the pre-tax revenues found by the Commission to be appropriate for that period. Company shall calculate a GSRS adjustment which shall, upon Commission approval, recover or refund the difference.
- 5. All provisions of this rider are subject to changes made by order of the Commission.

Issued:	February 5, 2019	
Effective:	February 6, 2019	
Ву:	/S/	
	Janet L. Buchanan, Director – Regulatory Affairs	

18-KGSG-560-RTS
Approved
Kansas Corporation Commission
February 5, 2019
/S/ Lynn Retz