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May 13, 2019

VIA ELECTRONIC TRANSMISSION

Ms. Lynn Retz
Secretary to Commission
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604

Re: In the Matter of the Application of The Empire District Electric Company for
Approval of the Commission to Make Certain Changes in its Charges for Electric
Service.

Docket Number 19-EPDE-223-RTS

Dear Ms. Retz:

Enclosed please find the *Direct Testimony for Crystal Turner* for filing in the above-referenced matter. Please feel free to contact me with any questions or concerns regarding this filing.

Sincerely,

Judy Jenkins Hitchye

JH/sef
Encl.

cc: Attorneys of Record

In the Matter of the Application of The)
Empire District Electric Company for Approval)
of the Commission to Make Certain Changes) Docket No. 19-EPDE-223-RTS
in its Charges for Electric Service.)

DIRECT TESTIMONY

OF

CRYSTAL D. TURNER

ON BEHALF OF KANSAS GAS SERVICE

A DIVISION OF ONE GAS, INC.

DIRECT TESTIMONY
OF
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A DIVISION OF ONE GAS, INC.

1 **I. POSITION AND QUALIFICATIONS**

2 **Q. Please state your name and business address.**

3 A. My name is Crystal D. Turner. My business address is 15 East Fifth Street in Tulsa, Oklahoma.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by ONE Gas, Inc., (“ONE Gas” and/or “OGS”) as a Rates Specialist.

6 **Q. Please describe your educational background and professional experience.**

7 A. I received a Master’s of Science Degree in Quantitative Financial Economics from Oklahoma
8 State University in 2012 and a Bachelor’s of Science Degree in Statistics with minors in
9 Mathematics and Spanish as well as an Honors Degree with International Emphasis from
10 Oklahoma State University in 2008. I began my career with ONE Gas in May 2014 as a Rates
11 Analyst I. In May 2016, I was promoted to a Rates Analyst II and in April 2018, I was promoted
12 to Rates Specialist. Prior to joining ONE Gas, I worked as a Risk Analyst for Seminole Energy
13 Services, LLC from February 2012 to April 2014. From May 2011 to January 2012, I worked as
14 a Technical Sales Support Intern for Enogex. In my current capacity with ONE Gas, my
15 responsibilities include performing advanced level of accounting activities; analyzing and
16 preparing advanced studies and reports related to cost of service, rate design, alternative
17 ratemaking, and depreciation.

1 **Q. Have you previously testified before any state regulatory commissions?**

2 A. Yes. I have provided testimony in the following proceedings:

- 3 • Direct and rebuttal testimony on behalf of Kansas Gas Service in Kansas Corporation
- 4 Commission (“Commission”) Docket No. 16-KGSG-491-RTS;
- 5 • Rebuttal testimony on behalf of Oklahoma Natural Gas in Oklahoma Corporation
- 6 Commission Cause No. PUD 201500213;
- 7 • Direct testimony on behalf of Oklahoma Natural Gas in Oklahoma Corporation
- 8 Commission Cause Nos. PUD 201700079, PUD 201800028 and PUD 201900018;
- 9 • Direct testimony on behalf of Texas Gas Service in the 2017 Rio Grande Valley municipal
- 10 statement of intent; and
- 11 • Direct testimony on behalf of Texas Gas Service in Gas Utilities Docket No. 10766 before
- 12 the Railroad Commission of Texas.

13 **II. PURPOSE OF TESTIMONY**

14 **Q. What is the purpose of your testimony?**

15 A. The purpose of my testimony is to discuss, on behalf of Kansas Gas Service, a Division of ONE

16 Gas Inc., (“KGS” or “the Company”), (1) the problematic issues related to energy efficiency

17 and energy conservation; (2) an inappropriate water heating, space heating and all-electric

18 customer subsidizations; and (3) the competitive consequences caused by outdated rate

19 designs such as those proposed by The Empire Electric Company (“Empire”) as specifically

20 related to the three current Residential tariffs (Residential General Service, Residential

21 General – Water Heating Service, and Residential Total Electric Service) and two Commercial

22 and Industrial tariffs (“C&I”) for C&I customers having electric load below 40kW (Commercial

23 Service and Small Heating Service). These proposed tariffs are not only misaligned with Staff’s

24 historical policy to encourage energy efficiency and conservation through rate design, but

1 they also force customers with diversified energy sources to subsidize the water heating,
2 space heating and all-electric customers or switch fuel sources. The proposed tariffs should
3 be corrected to remove the subclass subsidies and the incentives to load build for Empire.

4 **Q. Do you sponsor any exhibits to support your testimony?**

5 A. Yes, I sponsor the following three exhibits:

- 6 • Exhibit CDT – 1 KGS Recommended Residential Rate Design for Empire Electric;
- 7 • Exhibit CDT – 2 KGS Recommended C&I below 40kW Rate Design for Empire Electric; and
- 8 • Exhibit CDT – 3 KGS Recommended Rate Design Bill Impacts.

9 **Q. What criteria has Staff historically used to establish rate design?**

10 A. As previously described by Dr. Robert H. Glass¹, Staff has identified four important factors
11 required for designing utility rates:

- 12 • Fair Cost Appointment;
- 13 • Energy Efficiency and Energy Conservation;
- 14 • Gradualism; and
- 15 • Economic Development.

16 **Q. Has Empire relied on Staff's criteria to establish its proposed rate design?**

17 A. No, Empire does not discuss any considerations related to energy efficiency and energy
18 conservation in regard to the construction of their proposed rate design.

¹ Direct Testimony of Dr. Robert H. Glass, Docket No. 10-KCPE-415-RTS, page 17.

1 **Q. Please discuss the energy efficiency and energy conservation criteria and how it is related**
2 **to this case.**

3 A. First, the phrase *energy efficiency* is used to describe the decrease in energy use to perform
4 an equivalent function.² For example, a customer with a new energy efficient water heater
5 will produce the same level of hot water as she did with her old water heater but will use less
6 energy to do so. Second, *energy conservation* is a change in a customer's behavior that results
7 in a decrease in energy usage by the customer.³ For example, a customer may engage in
8 energy conservation by choosing to set their thermostat to a lower temperature in the winter
9 than they would like, thus requiring less energy to heat the home at the expense of their
10 comfort level. Utility rates can be designed to encourage either *energy efficiency* and/or
11 *energy conservation*, just as they can be designed to discourage it. Ultimately, rates should
12 be designed so that the customer pays the full cost of the electricity that they consume.

13 Empire has proposed declining block rate structures for: Residential General Service,
14 Residential General – Water Heating Service, Commercial Service and Small Heating Service.
15 A declining block rate means that as the customer's electricity usage increases, the cost of the
16 electricity decreases. As noted by Staff Witness, Dr. Glass, this type of rate is counteractive
17 to the Commission's policy to encourage energy efficiency and energy conservation.⁴ Dr.
18 Glass has also previously relied on research that claimed eliminating declining block rates
19 incentivizes consumers to conserve energy or use energy more efficiently.⁵

² U.S. Energy Information Administration, "Use of Energy in the United States Explained – Energy Efficiency and Conservation", February 1, 2019. https://www.eia.gov/energyexplained/index.php?page=about_energy_efficiency

³ U.S. Energy Information Administration, "Use of Energy in the United States Explained – Energy Efficiency and Conservation", February 1, 2019. https://www.eia.gov/energyexplained/index.php?page=about_energy_efficiency

⁴ Direct Testimony of Dr. Robert H. Glass, Docket No. 10-KCPE-415-RTS, page 19.

⁵ Direct Testimony of Dr. Robert H. Glass, Docket No. 12-KCPE-764-RTS, pages 6-7.

1 KGS supports Staff's prior recommendations on this issue and the Commission's policy
2 that electricity rates should reflect the cost to provide service rather than consumption.
3 Empire should not be allowed to give its residential and C&I customers having an electric load
4 below 40kW a discount for using more energy through declining block rates as proposed in
5 this case.

6 **Q. Has Empire provided sufficient evidence to support the use of declining block rates for**
7 **Residential customers?**

8 A. No, they have not provided any evidence that the archaic declining block rates are appropriate
9 for the Residential General Service and/or Residential General – Water Heating Service
10 customers.

11 **Q. Has Empire provided sufficient evidence to support the use of declining block rates for C&I**
12 **customers having electric load below 40kW?**

13 A. No, Empire has not provided any evidence that the outdated declining block rates are
14 appropriate for the C&I customer having an electric load below 40kW on the Commercial
15 Service and Small Heating Service tariffs.

16 **Q. Can Empire recover its required revenue without a declining block rate?**

17 A. Yes, it is my opinion that Empire can recover its required revenue without a declining block
18 rate for the respective Residential and/or C&I customers having electric load below 40kW
19 while still addressing bill continuity and gradualism concerns through the KGS recommended
20 Residential and C&I rate design, especially if Empire receives approval for the proposed
21 Revenue Stabilization Rider. As explained by KGS witness, Justin W. Clements, the decoupling
22 mechanism proposed by Empire is an appropriate solution to address volatility of customer
23 usage. I will discuss the KGS recommended rate design further in the Recommendations and
24 Conclusion section of my testimony.

1 **Q. Is Empire encouraging additional electricity usage through its proposed rate design?**

2 A. Yes, Empire is encouraging additional electricity usage and even fuel switching with its
3 proposed rate design. For example, as proposed, the Residential rate design recommends
4 the same monthly customer charge for all Residential customers. However, Empire has
5 proposed **lower volumetric rates** for the Residential General - Water Heating Service and the
6 Residential Total Electric Service customers than the volumetric rates proposed for the
7 Residential General Service customers. As proposed it should be noted, the Residential Total
8 Electric Service customers volumetric rates are the lowest of the three. Additionally, the Small
9 Heating Service proposed volumetric rate is also less than the proposed Commercial Service
10 volumetric rate for C&I customers having an electric load below 40kW. The difference
11 between these two C&I tariffs is that the terms of the Small Heating Service tariff requires the
12 customer to also have “permanently installed and regular usage of electric space heating
13 equipment”.⁶ This proposed rate design results in an unreasonable penalty, (higher electric
14 rates), to Empire’s customers who have chosen to diversify their energy sources. Ultimately,
15 these customers (such as customers who use KGS for space heating), will pay more for the
16 same electric services received by other Empire residential customers and/or C&I customers
17 having an electric load below 40kW.

18 **Q. Has Empire provided sufficient evidence to support the Residential Service customers**
19 **subsidizing the Residential General – Water Heating Service and Residential Total Electric**
20 **Service customers?**

21 A. No, Empire has not provided sufficient evidence to support the discounted usage rates
22 provided to the Residential General – Water Heating Service and Residential Total Electric
23 Service. **Furthermore, Empire has recommended a 16.5% revenue increase to each of the**

⁶ Direct Testimony of Timothy S. Lyons, Docket No. 19-EPDE-223-RTS, Figure 1 page 6.

1 **Residential classes even though the Cost of Service Summary clearly shows that the**
2 **Residential General – Water Heating Service and Residential Total Electric Service classes**
3 **require a larger percent increase than the Residential Service class.**⁷ Empire is blatantly
4 ignoring the Residential subclass subsidization that is occurring and is not attempting to
5 correct it, resulting in load building, fuel-switching and discouragement of energy efficiency
6 & conservation.

7 **Q. Has Empire provided sufficient evidence to support the Commercial Service customers**
8 **subsidizing the Small Heating Service customers?**

9 A. No, Empire has not provided sufficient evidence to support the discounted usage rates for the
10 Small Heating Service customers. Additionally, Empire has recommended a 5.4% revenue
11 increase for the Small Heating Service customers compared to the 3.9% Commercial Service
12 customers. However, according to the Cost of Service Summary under Revenues at Equalized
13 Rates of Return, the Commercial Service customers should be receiving a percentage
14 decrease to revenues.⁸ This fact further displays Empire's unmistakable intent to load build
15 and/or to encourage fuel-switching.

16 **Q. What is the Commissions policy on fuel-switching incentives?**

17 A. In the precedential⁹ Order to Close Docket No. 09-GIMX-160-GIV¹⁰, the Commission states in
18 Finding of Fact 14:

19 Based on the comments filed by the parties, the Commission observes that a
20 focus of this docket has become whether rate levels and structures incent
21 customers to substitute one fuel source for another, for example rate structures
22 that encourage customers to substitute electric energy for natural gas or vice
23 versa. As a matter of public policy, the Commission concludes that it is
24 inappropriate to implement rate structures designed to protect firms from
25 competition.

⁷ Direct Testimony of Timothy S. Lyons, Docket No. 19-EPDE-223-RTS, EXHIBIT TSL-2, page 2.

⁸ Direct Testimony of Timothy S. Lyons, Docket No. 19-EPDE-223-RTS, EXHIBIT TSL-2, page 2.

⁹ Amended Order to Close Docket No. 09-GIMX-160-GIV, Page 1.

¹⁰ Order to Close Docket in Docket No. 09-GIMX-160-GIV, Pages 6-7.

1
2 The Commission goes on to state in Finding of Fact 16 of the same docket that:

3 . . . every unjust or unreasonably discriminatory or unduly preferential rule,
4 regulation, classification, rate, charge or exaction is prohibited and is unlawful
5 and void, and that the Commission has the power to require all electric public
6 utilities to establish and maintain just and reasonable rates. K.S.A. 66-101b. The
7 Commission is mindful that if it finds any rate, rule and regulation, practice or
8 act is found to be unjust, unreasonable, unfair, unjustly discriminatory or
9 unduly preferential, or in violation of Kansas laws, the Commission has the
10 power to establish, and order substituted therefor, such rates or rules and
11 regulations as the Commission determines to be just, reasonable and
12 necessary. K.S.A. 66-101f.

13 **Q. Does Empire's proposed rate design encourage fuel switching?**

14 A. Yes, as presented, Empire's proposed declining block rates (and subsidization) for water
15 heating and all-electric residential customers and space heating C&I customers having electric
16 load below 40kW cause a competitive imbalance for other energy sources such as the natural
17 gas service provided by KGS, by promoting fuel switching. Large swings in customers base
18 and energy usage from customer fuel switching will significantly impact a natural gas utility
19 company's ability to recover their allowed revenue requirement as customers leave the
20 system. This fuel switching, in the long run, will result in the imposition of additional cost
21 increases on a gas utility's remaining customers.

22 **III. RECOMMENDATIONS AND CONCLUSION**

23 **Q. Do you have a recommended Residential rate design?**

24 A. Yes, I recommend Empire consolidate the Residential General Service, Residential General –
25 Water Heating Service, and Residential Total Electric Service into one Residential General
26 Service tariff with a monthly customer charge of \$17.00 and a volumetric charge of \$0.07172
27 to recover the same total target Residential revenue proposed by Empire. Please see, the
28 attached Exhibit CDT – 1, containing the KGS recommended Residential rate design.
29 Alternatively, to promote gradualism, I recommend Empire close the Residential General –

1 Water Heating Service and Residential Total Electric Service tariffs so that new and existing
2 customers cannot join these tariff groups and cause further discrimination against the
3 Residential General Service group.

4 **Q. Do you have a recommended C&I rate design for customers having an electric load below**
5 **40kW?**

6 A. Yes, I recommend Empire consolidate the Commercial Service and Small Heating Service
7 tariffs into one General Commercial Service tariff for C&I customers having an electric load
8 below 40kW with a monthly customer charge of \$20.00 and a volumetric charge of \$0.08679
9 resulting in the same total target C&I revenue for C&I customers having an electric load below
10 40kW as proposed by Empire. Exhibit CDT – 2, attached hereto, contains the KGS
11 recommended C&I below 40kW rate design. Similar to my Residential recommendation to
12 promote gradualism, I alternatively recommend Empire close the Small Heating Service tariff
13 so that new and existing customers cannot join this tariff grouping and further distort the C&I
14 subsidization for customers having an electric load below 40kW.

15 **Q. Have you prepared a Customer Bill Impact analysis for your recommended Residential and**
16 **Commercial rate designs?**

17 A. Yes, I have prepared an annual average Customer Bill Impact analysis comparing the KGS
18 recommended rates to both the current and proposed Empire rates as provided in Exhibit
19 CDT – 3, as attached hereto. This analysis identifies the percent increases to current classes
20 that are more reflective of Empire's Cost of Service Summary¹¹ which show that the
21 residential water heating, residential all-electric and C&I space heating tariffs require a larger
22 percent revenue increase.

¹¹ Direct Testimony of Timothy S. Lyons, Docket No. 19-EPDE-223-RTS, EXHIBIT TSL-2, page 2.

1 **Q.** **Does this conclude your testimony?**

2 **A.** Yes, it does.

VERIFICATION

STATE OF OKLAHOMA)
) ss.
COUNTY OF TULSA)

Crystal D. Turner, being duly sworn upon her oath, deposes and states that she is a Rates Specialist for 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.


Crystal D. Turner

Subscribed and sworn to before me this 9th day of May 2019.




NOTARY PUBLIC

My appointment Expires:

October 25, 2021

KGS Recommended Rate Design
Residential General Rate Design

Base Rate Revenues	Empire Proposed Residential General Service			Empire Proposed Residential General - Water Heating Service			Empire Proposed Residential Total Electric Service			KGS Recommended Residential General Service		
Target Revenues	5,791,366			926,057			2,662,617			9,380,041		
Current Revenues	4,969,878			794,715			2,285,058			8,049,651		
\$ Difference	821,488			131,342			377,559			1,330,389		
% Difference	16.5%			16.5%			16.5%			16.5%		
	kWh Usage			kWh Usage			kWh Usage			kWh Usage		
Annual Usage - First Block	30,026,795			4,569,222			34,436,656			107,534,881		
Annual Usage - Second Block	32,335,503			6,166,706			-			-		
Total Usage	62,362,298			10,735,927			34,436,656			107,534,881		
Number of Bills	66,530			9,139			22,401			98,070		
Average Annual Use (kWh)	11,248			14,097			18,447			13,158		
Average Monthly Use (kWh)	937			1,175			1,537			1,097		
Residential General Rate Design	Rate	Units	Revenues	Rate	Units	Revenues	Rate	Units	Revenues	Rate	Units	Revenues
Proposed Rates												
Customer Charge	\$ 17.00	66,530	\$ 1,131,010	\$ 17.00	9,139	\$ 155,363	\$ 17.00	22,401	\$ 380,817	\$ 17.00	98,070	\$ 1,667,190
1st Block kWh	\$ 0.07920	30,026,795	2,378,041	\$ 0.07341	4,569,222	335,434	\$ 0.06626	34,436,656	2,281,800	\$ 0.07172	107,534,881	7,712,851
2nd Block kWh	\$ 0.07058	32,335,503	2,282,316	\$ 0.07058	6,166,706	435,261	\$ -	-	-	\$ -	-	-
Revenue at Proposed Rates			5,791,366			926,057			2,662,617			\$ 9,380,041
Total Proposed Empire Residential Revenue Difference												9,380,041 -

KGS Recommended Rate Design
Commercial & Industrial below 40kW Rate Design

Base Rate Revenues	Empire Proposed Commercial Service			Empire Proposed Small Heating Service			KGS Recommended General Commercial Service (C&I customer below 40kW)		
Target Revenues	1,912,389			239,147			2,151,536		
Current Revenues	1,841,135			226,836			2,067,971		
\$ Difference	71,253			12,311			83,565		
% Difference	3.9%			5.4%			4.0%		
	kWh Usage			kWh Usage			kWh Usage		
Annual Usage - First Block	5,230,724 700			896,011 1000			21,210,130		
Annual Usage - Second Block	13,200,007			1,883,388			21,210,130		
Total Usage	18,430,731			2,779,399			21,210,130		
Number of Bills	14,215			1,317			15,532		
Average Annual Use (kWh)	15,559			25,325			16,387		
Average Monthly Use (kWh)	1,297			2,110			1,366		
Commercial & Industrial below 40kW Rate Design	Rate	Units	Revenues	Rate	Units	Revenues	Rate	Units	Revenues
Proposed Rates									
Customer Charge	\$ 20.00	14,215	\$ 284,300	\$ 20.00	1,317	\$ 26,340	\$ 20.00	15,532	\$ 310,640
1st Block kWh	\$ 0.09589	5,230,724	501,564	\$ 0.08320	896,011	74,544	\$ 0.08679	21,210,130	1,840,896
2nd Block kWh	\$ 0.08534	13,200,007	1,126,525	\$ 0.07341	1,883,388	138,263	\$ -	-	-
Revenue at Proposed Rates			1,912,389			239,147			\$ 2,151,536
Total Proposed Empire Residential Revenue Difference									2,151,536 -

Customer Bill Impacts

Description		Current Rates	KGS Recommended Rates	Company Proposed Rates					Change from Current to Recommended		Change from Current to Proposed		
(a)	(b)	(c)	(d)	Year-Round Average Monthly Bill									
					Average								
					Monthly Usage	Current	Recommended	Proposed	Dollars	%	Dollars	%	
Residential General Service													
Monthly Customer Charge		\$ 14.00	\$ 17.00	\$ 17.00	Annual	937	\$ 75.77	\$ 84.23	\$ 88.33	\$ 8.46	11.2%	\$ 12.56	16.6%
Volumetric Rates	All kWh		\$ 0.07172										
	1st Block kWh	600	\$ 0.06858	\$ 0.07920									
	2nd Block kWh		\$ 0.06112	\$ 0.07058									
Residential General - Water Heating Service													
					Average								
					Monthly Usage	Current	Recommended	Proposed	Dollars	%	Dollars	%	
Monthly Customer Charge		\$ 14.00	\$ 17.00	\$ 17.00	Annual	1,175	\$ 86.98	\$ 101.26	\$ 101.61	\$ 14.28	16.4%	\$ 14.63	16.8%
Volumetric Rates	All kWh		\$ 0.07172										
	1st Block kWh	600	\$ 0.06309	\$ 0.07341									
	2nd Block kWh		\$ 0.06112	\$ 0.07058									
Residential Total Electric Service													
					Average								
					Monthly Usage	Current	Recommended	Proposed	Dollars	%	Dollars	%	
Monthly Customer Charge		\$ 14.00	\$ 17.00	\$ 17.00	Annual	1,537	\$ 101.98	\$ 127.26	\$ 118.86	\$ 25.28	24.8%	\$ 16.88	16.6%
Volumetric Rates	All kWh	\$ 0.05723	\$ 0.07172	\$ 0.06626									
Commercial Service													
					Average								
					Monthly Usage	Current	Recommended	Proposed	Dollars	%	Dollars	%	
Monthly Customer Charge		\$ 19.00	\$ 20.00	\$ 20.00	Annual	1,297	\$ 133.28	\$ 132.53	\$ 138.03	\$ (0.75)	-0.6%	\$ 4.75	3.6%
Volumetric Rates	All kWh		\$ 0.08679										
	1st Block kWh	700	\$ 0.09284	\$ 0.09589									
	2nd Block kWh		\$ 0.08263	\$ 0.08534									
Small Heating Service													
					Average								
					Monthly Usage	Current	Recommended	Proposed	Dollars	%	Dollars	%	
Monthly Customer Charge		\$ 19.00	\$ 20.00	\$ 20.00	Annual	2,110	\$ 175.23	\$ 203.17	\$ 184.71	\$ 27.94	15.9%	\$ 9.48	5.4%
Volumetric Rates	All kWh		\$ 0.08679										
	1st Block kWh	1000	\$ 0.07891	\$ 0.08320									
	2nd Block kWh		\$ 0.06963	\$ 0.07341									

CERTIFICATE OF SERVICE

I, Judy Jenkins Hitchye, hereby certify that a copy of the above and foregoing *Direct Testimony for Justin Clements* was forwarded this 13th day of May 2019, addressed to:

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