

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

In the Matter of the Complaint Against Kansas
Gas Service by Lisa D. Bennett.

Docket No. 25-KGSG-396-COM

**COMPLAINANT'S REPLY TO RESPONDENT'S REPLY TO EMERGENCY MOTION
FOR IMMEDIATE REINSTATEMENT OF GAS SERVICE**

Lisa D. Bennett ("Complainant"), pursuant to K.A.R. 82-1-218, respectfully submits this reply to the response filed by Kansas Gas Service ("Respondent") dated May 20, 2025. In further support of her Emergency Motion, Complainant states:

1. Mootness Claim is Misplaced

While Respondent claims the Motion is moot due to same-day restoration, the disconnection itself violated procedural protections and caused significant hardship, including lack of essential utilities. Harm was suffered during those hours, and Respondent's actions warrant scrutiny and consequences.

2. Bad Faith and Pattern of Conduct

Though Respondent asserts the disconnection was unintentional, this "harmless error" occurred while a formal complaint was pending. This contradicts fair dealing expectations and suggests a failure in internal controls or intentional retaliation.

3. Disputed Amounts and Due Process

Complainant has repeatedly disputed the account charges and the terms of the alleged payment plan, as reflected in both informal and formal complaints. Under Section 5.07, disconnection must be postponed pending full investigation. Respondent's notices and calls do not cure the violation of due process protections when the underlying dispute was unresolved.

4. Request for Relief

Complainant respectfully requests that the Commission:

- Recognize that the May 15, 2025 disconnection was procedurally improper and harmful;
- Order Kansas Gas Service to refrain from any further disconnect actions until full resolution of the pending complaint;
- Consider sanctions or consumer protections to prevent recurrence;
- Award any other relief deemed just and appropriate.

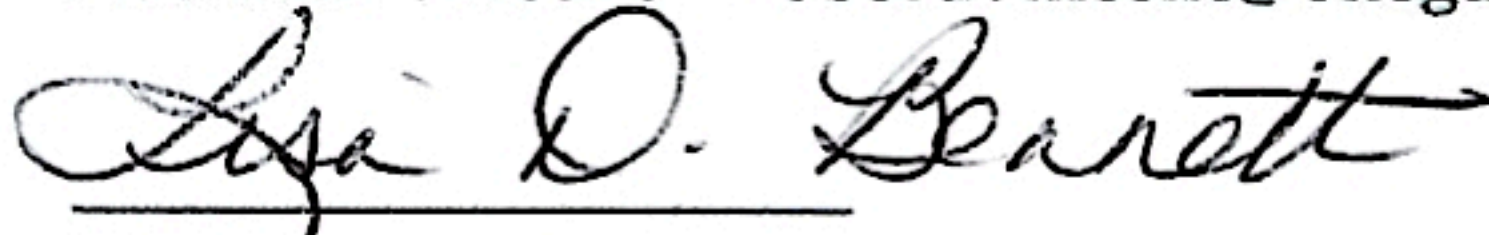
Respectfully submitted,

Lisa D. Bennett
P.O. Box 20365
Wichita, Kansas 67208

CERTIFICATE OF SERVICE

I hereby certify that on this May 21, 2025, a true and correct copy of the foregoing Reply was served via email to:

Brett W. Berry – Brett.Berry@ks.gov
Brian G. Fedotin – Brian.Fedotin@ks.gov
Robert E. Vincent – Robert.Vincent@onegas.com



Lisa D. Bennett