

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

In the Matter of Kansas Gas Service, a )  
Division of ONE Gas, Inc.'s Compliance )  
with the Commission's July 9, 2020 Order ) Docket No. 21-KGSG-042-CPL  
in Docket No. 20-GIMG-423-ACT. )

**KANSAS GAS SERVICE'S COMPLIANCE FILING - NARRATIVE**

Kansas Gas Service, a Division of One Gas, Inc., (Kansas Gas Service or Company), in compliance with the Commission's Order dated July 9, 2020, in Docket No. 20-GIMG-423-ACT ("Order"), respectfully submits its Compliance filing - Narrative.

The Company states and reports as follows:

1. Kansas Gas Service is a natural gas public utility operating in the state of Kansas pursuant to certificates of convenience and necessity issued by the Commission. Kansas Gas Service's principal place of business within the state of Kansas is located at: 7421 West 129<sup>th</sup> Street, Overland Park, Kansas 66213.

2. The names, addresses and phone numbers of the persons authorized to receive notices and communications with respect to this compliance filing on behalf of Kansas Gas Service are as follows:

Judy Jenkins Hitchye, Managing Attorney  
Kansas Gas Service  
a Division of ONE Gas, Inc.  
7421 West 129th Street  
Overland Park, Kansas 66213  
(913) 319-8615  
[judy.jenkinshitchye@onegas.com](mailto:judy.jenkinshitchye@onegas.com)

and,

Janet Buchanan, Rates and Regulatory Director

Kansas Gas Service  
a Division of ONE Gas, Inc.  
7421 West 129th Street  
Overland Park, Kansas 66213  
(913) 319-8662  
[janet.buchanan@onegas.com](mailto:janet.buchanan@onegas.com)

3. Pursuant to the Order issued in Docket No. 20-GIMG-423-ACT, which adopted Staff's Report and Recommendation dated May 21, 2020, ("Report and Recommendation"), Kansas Gas Service is required to file a detailed narrative describing the processes and procedures for identifying and tracking cost increases and decreases associated with the response to COVID-19 with updates as additional information becomes available.<sup>1</sup>

4. In accordance with the Report and Recommendation, Kansas Gas Service hereby attaches its narrative, hereto as "Exhibit C".

**WHEREFORE**, Kansas Gas Service, a Division of ONE Gas, Inc., prays the Commission accept this compliance filing and for such other relief as the Commission may deem just and proper.

Respectfully submitted,

/s/ J. J. Hitchye  
Judy Jenkins Hitchye, KS Bar #23300  
KANSAS GAS SERVICE  
7421 West 129<sup>th</sup> Street  
Overland Park, Kansas 66213-2634  
(913) 319-8615, telephone  
(913) 319-8622, facsimile  
[Judy.JenkinsHitchye@onegas.com](mailto:Judy.JenkinsHitchye@onegas.com)  
Attorney for Kansas Gas Service, a Division  
of One Gas, Inc.

---

<sup>1</sup> See, Staff's Report and Recommendation at *Executive Summary*, Page 4, Section 1 (Docket No. 20-GIMG-423-ACT, dated May 21, 2020).

VERIFICATION

STATE OF KANSAS        )  
  )  
COUNTY OF JOHNSON    )

I, Judy Jenkins Hitchye, of lawful age, being first duly sworn upon oath, states as follows: I am a Managing Attorney for Kansas Gas Service, a Division of ONE Gas, Inc. I have read the above *Compliance Filing - Narrative* and all the statements therein are true to the best of my knowledge, information and belief.

/s/ J.J. Hitchye  
Judy Jenkins Hitchye

*Affiant*

SUBSCRIBED AND SWORN to before me on 8/7/2020.

  
Notary public

My Appointment Expires:

6/5/22



**CERTIFICATE OF SERVICE**

I, Judy Jenkins Hitchye, hereby certify that a copy of the above and foregoing *Compliance Filing - Narrative* was forwarded this 7<sup>th</sup> day of August, 2020, addressed to:

JOSEPH R. ASTRAB  
ATTORNEY CITIZENS' UTILITY  
RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[j.astrab@curb.kansas.gov](mailto:j.astrab@curb.kansas.gov)

TODD E. LOVE  
ATTORNEY CITIZENS' UTILITY  
RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[t.love@curb.kansas.gov](mailto: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](mailto:D.NICKEL@CURB.KANSAS.GOV)

SHONDA RABB  
CITIZENS' UTILITY RATEPAYER  
BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[s.rabb@curb.kansas.gov](mailto:s.rabb@curb.kansas.gov)

DELLA SMITH  
CITIZENS' UTILITY RATEPAYER  
BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[d.smith@curb.kansas.gov](mailto:d.smith@curb.kansas.gov)

COLE BAILEY  
LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[c.bailey@kcc.ks.gov](mailto:c.bailey@kcc.ks.gov)

LAUREN LAUSHMAN  
OFFICE OF GENERAL COUNSEL  
ATTORNEY  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[l.laushman@kcc.ks.gov](mailto:l.laushman@kcc.ks.gov)

TERRI PEMBERTON  
CHIEF LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[T.pemberton@KCC.KS.GOV](mailto:T.pemberton@KCC.KS.GOV)

JANET BUCHANAN  
DIRECTOR - REGULATORY AFFAIRS  
KANSAS GAS SERVICE, A DIVISION OF  
ONE GAS, INC.  
7421 W 129TH ST  
OVERLAND PARK, KS 66213-2713  
[janet.buchanan@onegas.com](mailto:janet.buchanan@onegas.com)

JUDY JENKINS HITCHYE  
MANAGING ATTORNEY  
KANSAS GAS SERVICE, A DIVISION OF  
ONE GAS, INC.  
7421 W 129TH ST  
OVERLAND PARK, KS 66213-2713  
[judy.jenkinshitchye@onegas.com](mailto:judy.jenkinshitchye@onegas.com)

*Isl J.J. Hitchye*

Judy Jenkins Hitchye, KS Bar No. 23300  
Managing Attorney  
KANSAS GAS SERVICE  
A Division of ONE Gas, Inc.  
7421 West 129<sup>th</sup> Street  
Overland Park, Kansas 66213-5957  
(913) 319-8615 Phone  
(913) 319-8622 Fax  
[judy.jenkinshitchye@onegas.com](mailto:judy.jenkinshitchye@onegas.com)

# EXHIBIT C

**Staff Request:**

*One month from a Commission Order approving the AAO, the Gas Utilities shall file a detailed narrative, with numerical examples if possible, describing the processes and procedures they plan to utilize to identify and track all cost increases and decreases associated with the response to COVID-19. Additionally, each utility should report on its proposed methodology for quantifying any lost revenues that it has experienced during the COVID-19 pandemic.*

*Staff anticipates that an appropriately responsive filing would detail the accounting controls and processes to identify and track cost increases and decreases, the specific methodology behind identifying the baseline from which these costs will be compared, cost categories and account codes anticipated to be utilized, and other utility-specific details. This filing should be updated as additional information becomes available that changes the content of the original filing.*

**Response:**

ONE Gas established expense account 9210106 to track costs directly associated with the COVID-19 pandemic. On March 13, 2020 communication of this new account was distributed internally including answers to potential questions regarding when it should be used. An example of this distribution is included as 21-KGSG-042-CPL Attachment A. This account identifies incremental costs incurred as part of the COVID-19 pandemic response so that such costs can be isolated and verified. As expense reports are submitted, charges with invoice support are reviewed by the manager of the employees originating the expenses to ensure that recording to the 9210106 account is appropriate and proper.

KGS is also monitoring expense reductions during the COVID-19 pandemic. The company has identified cost decreases, that offset these incremental expense increases discussed above, that are tracked in Travel/Entertainment and Training categories for both KGS and those expenses allocated through Dstrigas. KGS's last rate case in Docket No. 18-KGSG-560-RTS (560 Docket) was resolved through a black box settlement which now makes it difficult to establish the level of these specific expense categories included in base rates. Thus, KGS is using a 3-year average to establish a baseline for "normal" levels of these expenses. In order to calculate a variance from "normal" operations, the current month expense is compared to the three-year average expense for that month.

Additionally, bad debt expenses, waived late payment fees, reconnect, and collection charges are all compared to the Staff's position, adjusted for the final settlement revenue increase, in the 560 Docket in order to quantify lost revenue. Again, a black-box settlement was reached in the 560 Docket making it difficult to establish the level of fees and bad debt expense included in base rates. However, Staff's adjusted test year is used as a baseline for revenue analysis purposes since there was little or no disagreement on these issues.

**Staff Request:**

*One month from a Commission Order approving the AAO, the Gas Utilities shall file a detailed narrative describing what customer programs/protections each has implemented to assist its customers as a result of the COVID-19 pandemic. This is an opportunity for the Gas Utilities to highlight the customer assistance they are providing over and above the minimum or baseline customer protections that the Commission requires for all regulated utilities. Additionally, if the Gas Utilities have made charitable donations to customer assistance organizations or provided other direct customer financial assistance, those efforts should be detailed here. This filing should be updated as additional information becomes available that changes the content of original filing.*

**Response:**

Kansas Gas Service has offered the following additional customer programs and enhanced customer contacts to assist our customers as a result of the COVID-19 pandemic beyond the requirements in the Commission’s orders. Enhanced customer contact efforts include:

- Contacting customers with past due balances in advance of resuming disconnects to discuss payment arrangements and provide social service agency information;
- Messaging on the top of all bills “Trouble paying your bill due to the COVID-19 pandemic? Contact us to discuss options;”
- Text message prior to a disconnection for nonpayment with link to pay bill;
- Bill insert to notify all customers of the suspension of the "knock and collect" requirement and again provide payment options;
- A third payment arrangement offering following two COVID-19 broken payment arrangements which allows the customer to pay 50% of balance and the remainder over up to three months; and,
- Payment arrangement offerings for large commercial customers.

Kansas Gas Service and the ONE Gas Foundation has made approximately \$105,000 in donations to the following organizations to assist in their COVID-19 relief efforts.

<b>Name of Organization</b>
United Way of Southeast Kansas
United Way of Wyandotte County
Family Health Care - KCKS
Caritas Clinics
Salina Area United Way
Flint Hills United Way
Manhattan Rotary Club

YWCA of Topeka
Boys and Girls Club
Helping Hands Humane Society
United Way of Reno County
United Way of Central Kansas
United Way of Greater Kansas City, COVID Relief Fund
Greater Manhattan Community Foundation
Topeka Community Foundation
Wichita Community Foundation

Kansas Gas Service provided meals to the following front-line organizations as a sign of appreciation for their work to responding to the COVID-19 crisis.

<b>Name of Organization</b>
Wyandotte County Sheriff's Office
St. Vincent Clinic
Health Partnership Clinic
Caritas Clinics
Topeka Police Department
HealthCore Clinic



**Jaynes, Graham A.**

---

**From:** Hokett, Rodney G.  
**Sent:** Friday, March 13, 2020 3:32 PM  
**To:** <Distribution List>  
**Subject:** COVID 19 - Account for Expense Tracking

ONE Gas has established the following account to track all expenses directly associated with COVID 19 response. Please see guidance below for using this account and forward to your team as appropriate.

**9210106 – A&G COVID 19 RESPONSE**

<u>Company</u>	<u>To CC</u>	<u>From CC</u>	<u>Account</u>	<u>EID</u>	<u>RFU</u>
xxx	xxxx	xxxx	9210106	xx	000000

**Potential Questions**

What types of expenses should we use this account for?

- Any new expense directly tied to COVID 19 response such as additional supplies, new employee PPE, contractor or consultant labor, or additional labor directly related to our response.

What types of expenses should we not use this account for?

- This account should not be used for any normal expenses that would have been incurred without the COVID 19 pandemic (i.e. regular or exempt labor, normal PPE, normal contract labor, etc.). This account would not be utilized for capital work.

What Cost Center and Company do I use?

- Please utilize your normal company and cost center so we can accurately identify where the expense occurred.

What expense indicator should I use?

- Please use the appropriate expense indicator based on the type of expense (i.e. 11 Labor, 15 Overtime, 21 Mis. S&E, 23 Contractor, 51 Stores Issues, 52 Direct Purchase Materials, etc.)

What if I am unsure if I should use this account or have already charged expenses somewhere else?

- Please contact Jeff Husen, Madiha Shaikh, Mario Parras, Rodney Hokett or someone on their team.

Thanks.  
Rodney

***Rodney Hokett***