## THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners:	Dwight D. Keen, Chair
	Shari Feist Albrecht
	Susan K. Duffy

In the Matter of the Application of Kansas Gas ) Service, a Division of ONE Gas, Inc., for ) Approval by the Commission for Gas System ) Docket No. 19-KGSG-088-TAR Reliability Surcharge Per K.S.A. 66-2201 ) through 66-2204 )

### **ORDER APPROVING GAS SYSTEM RELIABILITY SURCHARGE**

This matter comes before the State Corporation Commission of the State of Kansas ("Commission") for consideration and decision. Having reviewed the pleadings and record, the Commission makes the following findings and conclusions:

#### BACKGROUND

1. On March 28, 2019, Kansas Gas Service, a Division of ONE Gas, Inc., ("KGS") filed an Application with the Commission seeking approval of the 2018 Gas System Reliability Surcharge ("GSRS") True-Up. The True-Up filing supported an over recovery of GSRS revenue in the amount of \$14,324, for the period of September 2018 to January 2019.

2. On November 8, 2018, in the instant docket, the Commission approved KGS' request for a total GSRS revenue requirement of \$5,257,937. Additionally, KGS filed a rate case, Docket No. 18-KGSG-560-RTS ("18-560 Docket"), on June 29, 2018, in which the previous GSRS amount was included in base rates as required by K.S.A 66-2204(f)(1).

3. On February 6, 2019, KGS' new base rates became effective. Accordingly, KGS was required to file a True-Up based on K.S.A. 66-2204(f)(2).

#### DISCUSSION

4. On June 21, 2019, Commission Staff ("Staff") filed a Report and Recommendation, analyzing and recommending approval of KGS' GSRS True-Up. Staff noted that during the period from September 2018 through January 2019, KGS over-recovered the amount of GSRS revenue authorized in the subject docket on November 8, 2018. The amount of \$14,324, if immediately reconciled through the use of a one-time refund to customers, would result in a credit to residential customers of \$0.02.

5. Additionally, Staff noted that certain statutory provisions require KGS to file a True-Up relating to the rebasing of its GSRS charge when KGS' base rates changed in the 18-560 docket. While KGS is required to reconcile the differences after a base rate case, there is no mention in any statutory provision indicating if the over-recovery should be charged or refunded to customers.

6. Ultimately, Staff determined that given the deminimis nature of the credit, and in order to promote administrative efficiency, KGS' request to postpone the refund of its True-Up until its next GSRS filing should be approved.

### FINDINGS AND CONCLUSIONS

7. Upon review of the record as a whole, the Commission finds Staff's recommendation to be reasonable and adopts the same. KGS shall be allowed to defer inclusion of its over-recovery, in the amount of \$14,324, until KGS' next GSRS filing.

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## THEREFORE, THE COMMISSION ORDERS:

A. Kansas Gas Service's request to defer inclusion of its over-recovery in the amount of \$14,324 until its next GSRS filing is approved.

B. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).<sup>1</sup>

C. The Commission retains jurisdiction over the subject matter and parties for the purpose of entering such further orders as it deems necessary.

## BY THE COMMISSION IT IS SO ORDERED.

Keen, Chair; Albrecht, Commissioner; Duffy, Commissioner Dated: 07/09/2019

Lynn M. Ret

Lynn M. Retz Executive Director

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<sup>&</sup>lt;sup>1</sup> K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

Utilities Division 1500 SW Arrowhead Road Topeka, KS 66604-4027

Dwight D. Keen, Chair Shari Feist Albrecht, Commissioner Susan K. Duffy, Commissioner



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Laura Kelly, Governor

# REPORT AND RECOMMENDATION UTILITIES DIVISION

- TO: Chair Dwight D. Keen Commissioner Shari Feist Albrecht Commissioner Susan K. Duffy
- **FROM:** Brad Hutton, Auditor Justin Grady, Chief of Accounting and Financial Analysis Jeff McClanahan, Director of Utilities
- **DATE:** June 21, 2019
- **SUBJECT:** Docket No. 19-KGSG-088-TAR: In the Matter of Application of Kansas Gas Service a Division of ONE Gas, Inc. for Approval by the Commission for a Gas System Reliability Surcharge per K.S.A. 66-2201 through 66-2204.

# **EXECUTIVE SUMMARY:**

On March 28, 2019, Kansas Gas Service (KGS) filed an Application for approval of the 2018 Gas System Reliability Surcharge (GSRS) True-Up. The True-Up filing supported an overrecovery of GSRS revenue in the amount of \$14,324 for the period of September 2018 to January 2019. Staff performed an audit, discussed below, and recommends approval of KGS' request to defer the refund of the True-Up until its next GSRS filing, with an anticipated filing date later this year.

# **BACKGROUND:**

In the subject Docket, KGS requests to defer refunding to customers an over-recovery of \$14,324 in the Company's next GSRS filing, which is anticipated to be filed later this year.

On November 8, 2018, in this Docket, the Commission approved KGS's request for a total GSRS revenue requirement of \$5,257,937. KGS filed a rate case in Docket 18-KGSG-560-RTS on June 29, 2018, in which the previous GSRS amount was included in base rates as required by K.S.A. 66-2204 (f) (1):

"A natural gas public utility that has implemented a GSRS pursuant to the provisions of K.S.A. 66-2202 through 66-2204, and amendments thereto, shall file revised rate schedules to reset the GSRS to zero when new base rates and charges become effective

for the natural gas public utility following a commission order establishing customer rates in a general rate proceeding that incorporates in the utility's base rates, subject to subsections (h) and (i), eligible costs previously reflected in the currently effective GSRS"

KGS' new base rates became effective February 6, 2019. Accordingly, KGS is required to file a True-Up based on K.S.A. 66-2204 (f) (2) which states:

"upon the inclusion in a natural gas public utility's base rates subject to subsections (h) and (i) of eligible costs previously reflected in a GSRS, the natural gas public utility shall immediately thereafter reconcile any previously unreconciled GSRS revenues as necessary to ensure that revenues resulting from the GSRS match as closely as possible the appropriate pretax revenues as found by the commission for that period."

In this Docket, KGS filed a True-Up of its previously approved GSRS to comply with the abovereferenced statutory provisions.

## **ANALYSIS:**

In the period September 2018 through January 2019,<sup>1</sup> KGS over-recovered the amount of GSRS revenue authorized in the subject docket on November 8, 2018. The amount of \$14,324, if immediately reconciled through the use of a one-time refund to customers, would result in a credit to residential customers of \$(0.02). In its True-up filing, KGS requested that in lieu of a one-time credit to customers that it be allowed to defer theses costs until the Company's next GSRS filing.

As discussed in the background section above, there is a statutory provision that requires KGS to file a True-Up, relating to the rebasing of its GSRS charge when KGS' base rates changed in its most recent base rate case. While KGS is required to reconcile the differences after a base rate case, there is no mention of when this should be charged or refunded to customers in K.S.A. 66-2204.

Given the de minimis nature of the credit and to promote administrative efficiency, Staff supports KGS' request to postpone the refund of its True-Up to ratepayers until its next GSRS filing. Staff Reviewed the True-Up calculations included in the filing and found no errors in the calculations or supporting documentation.

#### **RECOMMENDATION:**

Staff recommends the Commission approve KGS' request to defer inclusion of its over-recovery in the amount of \$14,324 until KGS' next GSRS filing. KGS's GSRS filing has an anticipated filing date of later this calendar year.

<sup>&</sup>lt;sup>1</sup> Estimated recoveries for September through November of 2018 were used in KGS' previous GSRS. This True-Up filing includes the actual recoveries for those months.

## **CERTIFICATE OF SERVICE**

19-KGSG-088-TAR

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of

electronic service on 07/09/2019

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/S/ DeeAnn Shupe DeeAnn Shupe