# THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of a General Investigation to	)	
Evaluate Allowing Electric and Gas Utilities	)	
the Authority to Accept Irrevocable	)	Docket No. 19-GIMX-256-GIV
Letters of Credit in Lieu of Cash	)	
Deposits for System Expansion Related	)	
to Residential Development.	)	

#### **ENTRIES OF APPEARANCE**

COMES NOW, David W. Nickel, Thomas J. Connors and Todd E. Love hereby enters their appearances as counsel on behalf of the Citizens' Utility Ratepayer Board (CURB).

- 1. On January 8, 2019, the Kansas Corporation Commission (Commission) opened a docket for a general investigation to evaluate allowing electric and gas utilities the authority to accept irrevocable letters of credit in lieu of cash deposits for system expansion related to residential development.
- 2. The Commission made CURB a party to this docket to be served with copies of entries of appearances, comments, forms, and pleadings.
- 3. In addition to undersigned counsel, please serve the following CURB representatives with all electronic notices, pleadings, and correspondence regarding this docket:

Shonda Rabb
Public Service Administrator II
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
Email: s.rabb@curb.kansas.gov

Della Smith Senior Administrative Specialist Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 Email: d.smith@curb.kansas.gov

WHEREFORE, CURB respectfully requests inclusion of said counsel on record and to receive any future documents in this matter.

## Respectfully submitted,

David W. Nickel, Consumer Counsel #11170

Thomas J. Connors, Attorney #27039

Todd E. Love, Attorney #13445

Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

Topeka, KS 66604

(785) 271-3200

d.nickel@curb.kansas.gov

tj.connors@curb.kansas.gov

t.love@curb.kansas.gov

**Attorneys for CURB** 

#### **VERIFICATION**

STATE OF KANSAS	)	
COUNTY OF SHAWNEE	)	ss:

I, Thomas J. Connors, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.

Thomas J. Connors

SUBSCRIBED AND SWORN to before me this 10<sup>th</sup> day of January, 2019.

DELLA J. SMITH

Notary Public - State of Kansas
My Appt. Expires Jan. 26, 2021

otary Public

My Commission expires: 01-26-2021.

### **CERTIFICATE OF SERVICE**

#### 19-GIMX-256-GIV

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 10<sup>th</sup> day of January, 2019, to the following:

COLE BAILEY, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3354 c.bailey@kcc.ks.gov

BRIAN G. FEDOTIN, DEPUTY GENERAL COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 b.fedotin@kcc.ks.gov

MICHAEL NEELEY, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 m.neeley@kcc.ks.gov

Della Smith

Administrative Specialist