

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of American)
Energies Gas Service, LLC, to Change its) Docket No. 15-AEGG-158-RTS
Rates for Natural Gas Service and for)
Approval of its New Agreements with)
American Energies Pipeline, LLC.)

CURB's Response to the Report and Recommendation of the Commission Staff

The Citizens' Utility Ratepayer Board (CURB) files its response below to the *Report and Recommendation* of the Staff of the Kansas Corporation Commission (Staff), which was filed in the above-captioned docket on February 5, 2015:

Staff recommends that the Commission approve the revised \$1.45/Mcf gas gathering fee of American Energies Gas Service (AEGS) and a revenue decrease of \$20,934, subject to the following conditions:

- (1) eliminate the monthly dollar amount stated in AEGS's proposed Operation Services Agreement;
- (2) approve Staff's amended Operational Services Agreement;
- (3) approve Staff's amended Natural Gas Sales Agreement;
- (4) approve Staff's rate design;
- (5) deny AEGS's request to increase service fees and charges; and
- (6) AEGS must adopt the FERC Uniform System of Accounts.

CURB has reviewed AEGS's Application and has participated in discussions with Staff and the Company concerning the Application. CURB has reviewed the data responses and Staff's *Report*

and Recommendation. CURB concurs with Staff's concerns regarding the Application, and concurs with its recommendations to the Commission.

CURB therefore recommends that the Commission approve Staff's recommended revenue decrease of \$20,934 and the \$1.45/Mcf gas gathering fee, and make its approval subject to the six conditions proposed by Staff in its *Report and Recommendation*.

Respectfully submitted,



David Springe #15619
Niki Christopher #19311
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

CERTIFICATE OF SERVICE

15-AEGG-158-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 16th day of February, 2015, to the following:

James G. Flaherty, Attorney
Anderson & Byrd, LLP
216 S. Hickory, P.O. Box 17
Ottawa, KS 66067
jflaherty@andersonbyrd.com

Samuel Feather, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
s.feather@kcc.ks.gov

Robert Vincent, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
r.vincent@kcc.ks.gov

Jay Van Blaricum, Assistant General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
j.vanblaricum@kcc.ks.gov



Della Smith
Administrative Specialist