

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

In the Matter of Record Natural Gas Prices )  
and Potential System Reliability Issues from ) Docket No. 21-GIMX-303-MIS  
Unprecedented and Sustained Cold Weather. )

**STAFF’S REPORT AND RECOMMENDATION**

The Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) hereby files its Report and Recommendation (R&R), attached hereto as **Attachment A** and incorporated herein by reference, stating and recommending the following:

**I. BACKGROUND**

1. On February 15, 2021, the Commission opened this docket and issued an Emergency Order (Order) in response to record wholesale natural gas prices and potential utility system reliability issues associated with extreme and sustained arctic weather affecting Kansas and other states throughout the Midwest. As part of that Order, the Commission ordered and authorized jurisdictional utilities to “coordinate efforts and take all reasonably feasible, lawful, and appropriate actions to ensure adequate delivery of natural gas and electricity to interconnected, non-jurisdictional utilities in Kansas[,]” to “do all things possible and necessary to ensure natural gas and electricity utility services continue to be provided to their customers in the State[,]” and to defer the costs associated with these activities to a regulatory asset account.<sup>1</sup>

2. Additionally, the Commission directed each jurisdictional utility to file a compliance report in this docket detailing the costs incurred as a result of the weather events, and

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<sup>1</sup> Order, p. 3, ¶¶ A-C.

“present a plan to minimize the financial impacts of this event on ratepayers over a reasonable time frame.”<sup>2</sup>

3. As part of on-going discussions with respect to the unprecedented and sustained cold weather experienced in February, Staff has been working with Kansas utilities to better understand the pricing and reliability circumstances surrounding the events. Based on these discussions, and Staff’s evolving understanding of the events, it is Staff’s opinion that the financial impact plans contemplated in the Commission’s Order in this matter should be filed by the utilities in company-specific dockets.

4. Staff also recommends that as part of the company-specific dockets, the Commission permit Staff to investigate several general topics about the events, which will be refined as necessary to match each utility’s circumstances. The non-exhaustive list of general topics is set forth in greater detail in Attachment A.

5. Staff posits that having distinct, company-specific dockets will assist in the management of potential intervenors who may only be interested in participating in a proceeding for a given utility, as well as allow for the protection of any confidential information pertaining to market pricing, purchasing practices, power-marketing strategies and other company-specific information. Further, having company-specific dockets will allow the instant docket to be used as the repository for the industry-wide reports or findings resulting from investigations by entities such as FERC, NERC, SPP and others. It is Staff’s thought that approaching matters in this fashion will reduce confusion, and allow for a more efficient set of processes.

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<sup>2</sup> Order, p. 3, ¶ 5.

WHEREFORE, Staff respectfully submits the attached Report and Recommendation for Commission consideration.

Respectfully submitted,

*Terri J. Pemberton*

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Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Susan K. Duffy, Commissioner

Laura Kelly, Governor

## REPORT AND RECOMMENDATION

### UTILITIES DIVISION

To: Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Susan K. Duffy, Commissioner

From: Justin Grady, Chief of Revenue Requirements, Cost of Service and Finance  
Jeff McClanahan, Director of Utilities

Date: March 1, 2021

Re: Docket No. 21-GIMX-303-MIS  
In the Matter of the Record Natural Gas Prices and Potential System Reliability Issues from Unprecedented and Sustained Cold Weather.

#### **EXECUTIVE SUMMARY:**

On February 15, 2021, the Commission opened this Docket and issued an Emergency Order<sup>1</sup> in response to record wholesale natural gas prices and potential utility system reliability issues associated with extreme and sustained arctic weather affecting Kansas and other states throughout the Midwest. Staff now recommends the Commission open individual company specific investigative dockets in order to manage the pending Staff investigation into how each jurisdictional electric and natural gas utility was prepared for this cold weather event, how each responded during the event, and how the event will impact each utility's Kansas customers. Staff recommends individual dockets be opened for Eversource (inclusive of Eversource Kansas Metro and Eversource Kansas Central), Empire District Electric Company, Southern Pioneer Electric Company, Kansas Gas Service, Atmos Energy Corporation, Black Hills Energy, and American Energy Gas Service. Staff will continue to monitor (or participate in) industry-wide investigations occurring at the Federal Energy Regulatory Commission (FERC), the National Electric Reliability Corporation (NERC), and the Southwest Power Pool (SPP), and will file any broadly applicable reports or findings from those investigations into this Docket.

#### **BACKGROUND:**

From February 7, 2021, through February 19, 2021, Kansas and many other states throughout the Midwest experienced a severe and prolonged stretch of unseasonably cold temperatures. It was below freezing for thirteen straight days, with the temperatures during most of that time in the

<sup>1</sup> [https://estarc.kcc.ks.gov/estarc/ViewFile.aspx/Emergency\\_order\\_naturalgas.coldweather2\\_\(002\).pdf?Id=20da2a43-e05a-4255-acc4-deb442fcb6fb](https://estarc.kcc.ks.gov/estarc/ViewFile.aspx/Emergency_order_naturalgas.coldweather2_(002).pdf?Id=20da2a43-e05a-4255-acc4-deb442fcb6fb).

single digits to below zero. This period of prolonged arctic weather caused record demand for natural gas and electricity.<sup>2</sup> At the same time, natural gas production in Texas declined by 45% during this time period, mostly due to wellheads freezing according to the Energy Information Administration (EIA).<sup>3</sup>

In response to these weather conditions and supply constraints, Governor Kelly issued a State of Disaster Emergency Declaration on February 14, 2021.<sup>4</sup> The Commission issued an Emergency Order directing jurisdictional utilities to do all things necessary and possible to ensure natural gas and electricity service continued to be provided to their customers. Utilities were also directed to coordinate efforts and take all reasonably feasible, lawful, and appropriate actions to ensure adequate delivery of natural gas and electricity to interconnected, non-jurisdictional utilities in Kansas. Lastly, utilities were directed to record extraordinary costs associated with the weather event in a regulatory asset account and then file a compliance report presenting the costs of the event and a plan to minimize the financial impacts to customers.

Record demand for natural gas for home heating and electricity generation, amid reduced supplies from falling temperatures, led to a historic increase in the wholesale market price for natural gas. Natural gas prices of \$300-\$400 per MMBtu were widely reported during the weekend of February 13-14, with prices of \$500-\$1000 per MMBtu reported on February 15-16. During this time period, the daily Southern Star Central Gas Pipeline index reached a high of \$622.78. Operational flow orders (OFOs) were issued by both interstate gas pipelines<sup>5</sup> and natural gas distribution companies in Kansas.<sup>6</sup> Additionally, at least one natural gas distribution utility issued curtailment notices to customers. As a result, customers experienced periods of gas curtailment, including transportation customers and other interruptible customers.

Record natural gas prices and demand for electricity led to record wholesale electricity prices in the SPP Integrated Market (IM). On Feb. 15, SPP's day-ahead market price reached an all-time high of \$4,274/MWh. For comparison, the average price of energy in SPP's day-ahead market during 2020 was \$17.81/MWh. These market prices were not isolated to a few pricing intervals, the average on-peak day-ahead locational marginal price in SPP's IM from February 15-19 averaged 11,280% higher than the average over the last five years for those same dates.<sup>7</sup>

In addition to elevated market prices in the IM, supply and demand imbalances within SPP required it to take the extraordinary step of mandating load shedding for the first time in its 80-year history.<sup>8</sup> This occurred in two instances, 641 MW (1.5%) of load for 50 minutes on February 15, and 2,700

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<sup>2</sup> On February 15, 2021, the Southwest Power Pool (SPP) set a new all-time winter peak demand of 43,661 MW.

<sup>3</sup> See <https://www.eia.gov/todayinenergy/detail.php?id=46896>

<sup>4</sup> See <https://governor.kansas.gov/governor-laura-kelly-issues-state-of-disaster-emergency-due-to-wind-chill-warnings-and-stress-on-utility-and-natural-gas-providers/>.

<sup>5</sup> See [https://platform.marketintelligence.spglobal.com/web/client?auth=inherit#news/article?id=62687180&cdid=A-626871809269&KeyProductLinkType=58&utm\\_source=MIAAlerts&utm\\_medium=scheduledalert&utm\\_campaign=Alert\\_Email](https://platform.marketintelligence.spglobal.com/web/client?auth=inherit#news/article?id=62687180&cdid=A-626871809269&KeyProductLinkType=58&utm_source=MIAAlerts&utm_medium=scheduledalert&utm_campaign=Alert_Email).

<sup>6</sup> Operational Flow Orders are generally defined in tariffs as a directive instructing customers to control their usage to avoid either Under-Deliveries or Over-Deliveries to protect the integrity of any portion of Company's system or to insure compliance with upstream transporters' requirements.

<sup>7</sup> See <https://www.spglobal.com/platts/en/market-insights/latest-news/natural-gas/022521-spp-recalculates-prices-after-winter-storm-led-to-gas-power-record-highs>.

<sup>8</sup> See [https://platform.marketintelligence.spglobal.com/web/client?auth=inherit#news/article?id=62689168&cdid=A-62689168261&KeyProductLinkType=58&utm\\_source=MIAAlerts&utm\\_medium=scheduledalert&utm\\_campaign=Alert\\_Email](https://platform.marketintelligence.spglobal.com/web/client?auth=inherit#news/article?id=62689168&cdid=A-62689168261&KeyProductLinkType=58&utm_source=MIAAlerts&utm_medium=scheduledalert&utm_campaign=Alert_Email).

MW (6.5%) for a little more than three hours on February 16. The following recounts the timeline of events as reported on SPP's Current Grid Conditions website, which was updated throughout the event:

### **SPP Timeline of February 2021 Winter Weather Events**

- **Feb. 9 at 00:00 a.m.** In response to the current cold-weather event, SPP first declared a period of conservative operations effective until further notice.
- **Feb. 15 at 00:00 a.m.** SPP requested that load-serving utilities throughout the SPP region conserve energy beginning at midnight on Feb. 15 and for the following 48 hours to mitigate the risk of more widespread and longer-lasting outages.
- **Feb. 15, at 05:00 a.m.** SPP declared an Energy Emergency Alert (EEA) Level 1, meaning that all available resources had been committed to meet obligations, and SPP was at risk of not meeting required operating reserves.
- **Feb. 15 at 7:22 a.m.** SPP declared an EEA Level 2 which required SPP to ask its member companies to issue public conservation appeals, and served as a maximum emergency generation notification for resources, and informed the market that emergency ranges of any resources may be required.
- **Feb. 15 at 10:08 a.m.** SPP declared an EEA Level 3 when it was forced to begin relying on required reserve energy. This meant it was carrying reserves below the required minimum and had initiated assistance through the Reserve Sharing Group.
- **Feb. 15 at approximately 12:10 pm.** While still under EEA Level 3 and after exhausting reserves, SPP directed member utilities to implement controlled, temporary interruptions of service.
- **Feb. 15 at 2:00 p.m.** SPP declared a return to EEA Level 2, restoring load to the region with enough generation to meet demand and minimum reserve requirements.
- **Feb. 16 at 6:15 a.m.** SPP declared an EEA Level 3. System-wide generating capacity had dropped below current load of approximately 42 gigawatts (GW) due to extremely low temperatures, inadequate supplies of natural gas and wind generation. SPP directed member utilities to implement controlled, temporary interruptions of service.
- **Feb. 16 at 10:07 a.m.** SPP had restored all load, meaning it had enough generating capacity available to meet system-wide demand. It remained in an EEA Level 3, indicating it was still operating below required minimum reserves.
- **Feb. 16 at 11:30 a.m.** SPP returned to EEA Level 2 until further notice, restoring load to the region with enough generation to meet demand and minimum reserve requirements.
- **Feb. 16 at 12:31 p.m.** SPP downgraded to an EEA Level 1. While no longer an Energy Deficient Entity, all available resources were committed to meet obligations, and SPP remained at risk of not meeting required operating reserves.
- **Feb. 16 at 6:28 p.m.** SPP declared an escalation to EEA Level 2. SPP directed its member companies to issue public conservation appeals. The alert will remain in effect until further notice. At the time, SPP had enough generating capacity online to meet system-wide demand, but was taking steps to mitigate the risk of outages.
- **Feb. 17 at 1:15 p.m.** SPP downgraded to an EEA Level 1. While no longer an Energy Deficient Entity, all available resources were committed to meet obligations, and SPP remained at risk of not meeting required operating reserves.

- **Feb. 17 at 6:20 p.m.** SPP declared an escalation to EEA Level 2. SPP directed its member companies to issue public conservation appeals. The alert will remain in effect until further notice.  
**Feb. 17 at 10:59 p.m.** SPP downgraded to an EEA Level 1. While no longer an Energy Deficient Entity, all available resources were committed to meet obligations, and SPP remained at risk of not meeting required operating reserves.
- **Feb. 18 at 9:30 a.m.** SPP downgraded from EEA Level 1 to a conservative operations status. Due to continuing high loads and other severe cold weather implications, it will remain in a period of conservative operations until 10 p.m., Feb. 20, for the entire SPP balancing authority area.  
**Feb. 18 at 6:25 p.m.** SPP declared an EEA Level 1, meaning that all available resources had been committed to meet obligations, and SPP was at risk of not meeting required operating reserves.
- **Feb. 19 at 9:20 a.m.** SPP downgraded from EEA Level 1 to a conservative operations status. Due to continuing high loads and other severe cold weather implications, it will remain in a period of conservative operations until 10 p.m., Feb. 20, for the entire SPP balancing authority area.
- **Feb. 20 at 10:00 p.m.** SPP returned to normal operations for the entire SPP balancing authority area, signaling it has enough generation to meet demand and available reserves and foresees no extreme or abnormal threats to reliability.<sup>9</sup>

These load shedding events affected Kansas-jurisdictional electric utilities, as those utilities were instructed to absorb their share of the mandated load reductions.

### **ANALYSIS:**

The extraordinarily high wholesale natural gas and electricity prices cost Kansas jurisdictional utilities billions of dollars. For example, One Gas, Inc., of which Kansas Gas Service (KGS) is a division, incurred \$2.2 billion in gas purchase costs for just the month of February, four times the level of natural gas purchase costs incurred for the entire year of 2020. Similarly, Atmos Energy reported that it incurred costs of \$2.5 to \$3.5 billion for the month, a level that is two to three times an annual level of purchased gas expense. Black Hills energy reported \$600 million higher than normal purchased gas costs for the month of February (company-wide). The City of Eskridge and American Energies Gas Service both incurred very significant amounts of purchased gas expense relative to the size of their customer base.

Evergy, Inc. has reported an increase of approximately \$300 million in net purchased power expense from the weather event, although that amount is not evenly distributed throughout its operating companies depending on their generation profile and their ability to generate power during the event.<sup>10</sup> Staff has had discussions with Liberty-Empire and Southern Pioneer, both of which experienced extraordinary fuel and purchased power expenses during the event.

In addition to the financial impact of this event on Kansans, many experienced service interruptions as a result of the event. Kansas electric utilities were required to implement rolling

<sup>9</sup> See <https://www.spp.org/markets-operations/current-grid-conditions/>

<sup>10</sup> Evergy reports that Evergy Kansas Central incurred approximately \$100 million fuel and purchased power expense, with Evergy Metro experiencing a net benefit of \$60 million due to higher wholesale revenues.

blackouts on February 15 and February 16. Additionally, Kansas natural gas distribution utilities implemented gas service curtailments to interruptible and transportation customers.

In response to the electric service interruptions experienced in SPP, as well as the widespread and sustained service interruptions experienced by the Electric Reliability Council of Texas (ERCOT), the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) have announced a joint inquiry into the event.<sup>11</sup> Additionally, FERC has announced that its Office of Enforcement will be examining potential wrongdoing in markets during the cold weather event.<sup>12</sup> Several states have also opened proceedings to investigate utilities' preparation for and response to the event, as well as the eventual financial impacts on customers.

Staff contends that it is necessary to open individual company specific dockets to investigate at a minimum, how each jurisdictional electric and natural gas utility was prepared for this cold weather event, how each responded to the event, and how the event will impact each utility's Kansas customers. Opening company-specific investigative dockets will assist in the management of any potential intervenors in these proceedings, as well as allowing for the protection of any confidential information pertaining to market pricing, purchasing practices, power-marketing strategies and other company specific information. Staff further recommends that each utility's plan for minimizing the financial impact of the event for customers be filed in the individual Dockets instead of the 21-GIMX-303-MIS (21-303) Docket. Staff recommends the following Dockets be opened, with the captioning for each respective utility referencing the required compliance filings from the 21-303 Docket:<sup>13</sup>

- 21-EKME-\_\_\_-GIE (Eevergy Kansas Metro and Eevergy Kansas Central)
- 21-EPDE-\_\_\_-GIE (Empire District Electric Company d/b/a Liberty Empire)
- 21-SPEE-\_\_\_-GIE (Southern Pioneer Electric Company)
- 21-KGSG-\_\_\_-GIG (Kansas Gas Service Company, a Division of One Gas, Inc.)
- 21-ATMG-\_\_\_-GIG (Atmos Energy Corporation)
- 21-BHCG-\_\_\_-GIG (Black Hills Kansas Gas Utility Company d/b/a Black Hills Energy)
- 21-AEGG-\_\_\_-GIG (American Energies Gas Service)

Once these Dockets are opened, Staff intends to begin an investigation of several general topics, which will be refined as necessary to match each utility's circumstances. A non-exhaustive list of those topics is as follows:

- For electric or natural gas utilities that experienced load shedding events or service curtailments:

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<sup>11</sup> <https://www.ferc.gov/news-events/news/ferc-nerc-open-joint-inquiry-2021-cold-weather-grid-operations>.

<sup>12</sup> <https://www.ferc.gov/news-events/news/ferc-examine-potential-wrongdoing-markets-during-recent-cold-snap>.

<sup>13</sup> For example, the docket captioning could be, "*In the Matter of the Investigation Into [insert company name] Regarding the February 2021 Winter Weather Events, as Contemplated by Docket No. 21-GIMX-303-MIS*". Notwithstanding the referenced individualized utility dockets, Staff does not recommend opening an individual Docket at this time for the City of Eskridge. Any filings pertaining to the City's KCC-jurisdictional customers will continue to be made in the 21-303 Docket.



- What factors were used to determine which customers were impacted by these events? Were these factors followed in an equitable and uniform manner?
- What were the company's communication efforts surrounding the load shedding or curtailment events?
- Were company communications consistent with customer experiences? If not why?
- What lessons were learned in the area of customer communication that will allow for improved customer communication during the next extreme weather event?
- What steps did natural gas distribution utilities take to limit or prevent the financial impact of this event to customers?
  - Were hedging strategies utilized? Were they successful? What gas purchasing practices strategies were utilized during the event? Were those practices prudent?
  - Was the gas utility able to utilize storage to mitigate the extreme pricing experienced during the event? Were storage levels appropriate? Is the utility exploring additional storage options for the future?
  - What were the company's efforts during this time to encourage conservation or inform customers of the elevated price of natural gas supplies?
  - What were and are the company's efforts to mitigate penalties or imbalances on the pipelines?
- What steps did electric utilities take to limit or prevent the financial impact of this event to customers?
  - Were hedging strategies utilized? Were they successful? What gas purchasing practices strategies were utilized during the event? Were those practices prudent?
  - Was the company's interaction with the SPP IM prudent during this time? Were resource offers timely updated to reflect higher fuel prices?
  - What was the performance and availability of company-owned generation and purchased power agreements to mitigate ratepayer exposure to elevated wholesale power prices in the SPP IM?
- How did Kansas electric utilities prepare for, and perform during, this cold weather event?
  - Were Kansas electric utilities operationally prepared for this event? What lessons were learned that will prepare us for the next extreme weather event?
  - Did Kansas generating outages contribute to the supply imbalances across SPP that led to the load shedding events of February 15-16? If so, could these outages have been prevented or avoided?
  - Did the electric utilities experience any equipment or system failures (outside of generating plants) that contributed to operational challenges or service limitations during the event? If so, which units experienced these equipment or system failures?

- Did the electric utilities experience any gas supply or transportation limitations that limited the ability of natural gas generation to provide energy during the event? Was firm natural gas supply or transportation arranged and available?
- What lessons were learned that will prepare us for the next extreme weather event?
- How did Kansas natural gas utilities prepare for and perform during this cold weather event?
  - Did the gas utilities experience any equipment or system failures that led to operational challenges or curtailments during the event?
  - Did the gas utilities experience any gas supply limitations or equipment malfunctions on interstate gas pipelines that need to be remedied in the future?
  - What lessons were learned that will prepare us for the next extreme weather event?
- How did Kansas electric utilities and Kansas natural gas utilities coordinate in response to this cold weather event? What lessons were learned if anything that will improve coordination amongst electric and gas utilities during the next extreme weather event?
- Do Kansas electric utilities and Kansas natural gas utilities have any indication of or concerns about natural gas price gouging or market manipulation during the extreme weather event?
- Have the Kansas electric and Kansas natural gas utilities performed any due diligence to ensure that the prices paid for natural gas during this time were lawful under Kansas law? Have utilities explored whether there are potential legal remedies to customers under Kansas law, including but not limited to the consumer protection statutes?
- Have or will Kansas electric utilities and Kansas natural gas utilities need to obtain supplemental external financing in order to pay for the extreme weather event? If so, what overall financial impact will the additional financing have on the financial health of the utility?

In addition to performing a company specific investigation addressing the factors identified above, Staff will also monitor (and participate in if and when possible) investigations at the industry-wide level, such as FERC, NERC, SPP and any others. To the extent these investigations produce findings or reports that are widely applicable, Staff will file these reports in the 21-303 Docket.

**RECOMMENDATION:**

Staff recommends the Commission take the following specific actions:

1. Open the following company-specific investigation dockets:
  - 21-EKME-\_\_\_-GIE (Eversource Kansas Metro and Eversource Kansas Central)
  - 21-EPDE-\_\_\_-GIE (Empire District Electric Company d/b/a Liberty Empire)
  - 21-SPEE-\_\_\_-GIE (Southern Pioneer Electric Company)
  - 21-KGSG-\_\_\_-GIG (Kansas Gas Service Company, a Division of One Gas, Inc.)

- 21-ATMG-\_\_\_-GIG (Atmos Energy Corporation)
  - 21-BHCG-\_\_\_-GIG (Black Hills Kansas Gas Utility Company d/b/a Black Hills Energy)
  - 21-AEGG-\_\_\_-GIG (American Energies Gas Service)
2. Clarify that each utility should file its plan to minimize the financial effects of this cold weather event into the company-specific investigation dockets, instead of as a compliance filing in the 21-303 Docket.

## CERTIFICATE OF SERVICE

21-GIMX-303-MIS

I, the undersigned, certify that a true and correct copy of the above and foregoing Staff's Report and Recommendation was electronically served this 1st day of March, 2021, to the following:

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21-GIMX-303-MIS

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