

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

In the Matter of the Application of Southern Pioneer)
Electric Company for Approval of a Regulatory)
Asset, Allocation and Implementation Plan for) Docket No. 21-SPEE-331-GIE
Recovery of Extraordinary Costs Incurred as a)
Result of Extreme Weather and Market Conditions)
Experienced During the Month of February 2021.)

DIRECT TESTIMONY OF

**CHANTRY C. SCOTT
EXECUTIVE VP – CHIEF FINANCIAL OFFICER
SOUTHERN PIONEER ELECTRIC COMPANY**

ON BEHALF OF

SOUTHERN PIONEER ELECTRIC COMPANY

March 10, 2021

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Chantry C. Scott. My business address for legal service is 1850 W. Oklahoma,
4 Ulysses Kansas 67880 and for mail receipt is PO Box 430, Ulysses Kansas 67880-0430.

5 **Q. What is your profession?**

6 A. I am the Executive VP – Chief Financial Officer (“CFO”) and Assistant Secretary of
7 Southern Pioneer Electric Company, (“Southern Pioneer”), with its corporate office in
8 Ulysses, Kansas and distribution-customer service offices located in both Liberal and
9 Medicine Lodge, Kansas. I am also CFO of Pioneer Electric Cooperative, Inc. (“Pioneer”),
10 100% owner of Southern Pioneer. Pioneer is a member-owned electric cooperative not
11 subject to Kansas Corporation Commission (“KCC” or “Commission”) jurisdiction for rate
12 setting.

13 **Q. Please describe your responsibilities with Southern Pioneer.**

14 A. As the CFO, I work directly for the President-Chief Executive Officer. I am responsible
15 for assisting with establishing financial policy and rates, implementing Board-approved
16 strategic programs, and the overall financial operations of Southern Pioneer. As the
17 Assistant Secretary, in the absence of the Corporate Secretary, I sign and attest to corporate
18 resolutions and other documents as necessary or as authorized or directed by the Board of
19 Directors.

20 **Q. What is the purpose of your testimony in this proceeding?**

21 A. The purpose of my testimony is to provide support for Southern Pioneer’s Application in
22 this Docket requesting Commission approval of a regulatory asset for extraordinary costs
23 incurred as result of the extreme weather and market conditions experienced between
24 February 10–20, 2021, approval of Southern Pioneer’s proposed plan for recovery of the

1 regulatory asset in rates over an extended period of time to reduce the financial impact of
2 the event, a waiver Southern Pioneer's Energy Cost Adjustment (ECA) tariff for these costs
3 to the extent necessary to carry out the terms of the proposed plan, and an Expedited Interim
4 Order addressing disconnections occurring during the pendency of this docket and allowing
5 Southern Pioneer to bill one large industrial customer for its share of the extraordinary
6 costs in one charge on the customer's April bill, per the customer's request.

7 **Q. What is your educational background?**

8 A. I graduated from the University of Kansas in 2000 with a Bachelor of Science in both
9 Accounting and Business Administration, and in 2001 with a Master of Accounting and
10 Information Systems. I attended and completed various industry specific trainings
11 including the National Rural Electric Cooperative Association's Financial Planning and
12 Strategies Workshop and the Cooperative Financial Professional Certificate program.

13 **Q. What is your professional background?**

14 A. I began work at Pioneer in June of 2001 as Senior Accountant, where I assisted the
15 Manager of Finance and Administration in completing general accounting activities. In
16 December 2003, I was promoted to Manager of Accounting where I oversaw the
17 Financial Accounting department's activities such as budgeting, financial forecasting,
18 monthly and annual reporting, and various other accounting activities. In May 2011, I
19 was promoted to the position of Chief Financial Officer and VP of Finance and
20 Accounting. Finally, in November 2020, I was promoted to my current position of
21 Executive VP – Chief Financial Officer. Pursuant to the July 7, 2006 Services

1 Agreement between Pioneer and Southern Pioneer, I fulfill these same roles for
2 Southern Pioneer.

3 **Q. Have you previously presented testimony before the KCC?**

4 A. Yes. I provided direct, and in some instances rebuttal, testimony in Docket No. 12-
5 MKEE-380-RTS (“12-380 Docket”), Docket No. 13-MKEE-699-RTS (“13-699
6 Docket”), Docket No. 15-SPEE-161-RTS (“15-161 Docket”), Docket No. 18-KPEE-
7 343-COC (“18-343 Docket”), Docket No. 19-SPEE-240-MIS (19-240 Docket), and
8 Docket No. 20-SPEE-169-RTS (20-169 Docket). I have also provided review of or
9 assisted with preparing responses to and supporting documents for numerous data
10 requests and witness testimony in numerous Southern Pioneer dockets.

11 **II. BACKGROUND**

12 **Q. Please provide an overview of the Application filed by Southern Pioneer.**

13 A. Southern Pioneer files this Application pursuant to the Emergency Order of the State
14 Corporation Commission of the State of Kansas (“KCC” or “Commission”) issued
15 February 15, 2021 (Emergency Order) in Docket No. 21-GIMX-303-MIS (21-303
16 Docket). Southern Pioneer requests approval of its regulatory asset, its plan for recovery
17 of the extraordinary costs incurred as a result of extreme weather and market conditions
18 experienced during February of 2021, and waiver of its ECA tariff to the extent necessary
19 to carry out the terms of the plan proposed in this Application. In addition, Southern
20 Pioneer requests the Commission issue an Expedited Interim Order within ten (10) days
21 approving special provisions for customers disconnecting prior to issuance of a final order
22 in this docket and allowing one large industrial customer to pay its share of the

1 extraordinary February costs in its April bill instead of through allocation of the regulatory
2 asset.

3 **Q. Why is this Application necessary?**

4 A. Between February 13, 2021 and February 16, 2021, temperatures in Southern Pioneer's
5 service territory were below zero, dropping to as low as -19 degrees at one point. Similar
6 extreme weather temperatures were experienced during the same time through-out Kansas
7 and other areas of the Southwest Power Pool (SPP) region. These frigid temperatures
8 included the state of Texas.¹ From February 7, 2021 through February 19, 2021, this area
9 of the country experienced temperatures below freezing for thirteen straight days, with the
10 temperatures during most of that time in the single digits to below zero.

11 **Q. How did this affect power reliability in the areas affected by the cold?**

12 A. The extremely cold temperatures in the region dramatically increased customers' need for
13 power to heat their homes and businesses, which placed an unprecedented demand upon
14 the generation resources available to serve SPP load. The frigid temperatures also resulted
15 in natural gas freezing in the fields and pipelines, causing a significant strain on gas supply
16 necessary to run gas generation units across the region. Therefore, several gas generation
17 units in the SPP, including Sunflower-owned gas generation units, were not available to
18 run. That, coupled with the fact that wind production was minimal and there was limited
19 import of energy from other regions, resulted in SPP foreseeing a need to access
20 contingency reserves and the potential inability to effectively balance generation with load.
21 As detailed in the Application, beginning on February 14th, SPP issued requests for load
22 serving entities in the entire footprint to make public appeals to customers to voluntarily

¹ The northern part of Texas is in the SPP, with the rest of the state located in the ERCOT region. The Electric Reliability Council of Texas (ERCOT) is the independent transmission system operator in Texas, servicing about 90 percent its electric load.

1 conserve energy. Despite these efforts, on February 15th, SPP directed its member utilities
2 to implement controlled, temporary interruptions of service under each utility's load
3 shedding plan. SPP directed Sunflower to shed a total of 14 MWs of load during this event.
4 Two Southern Pioneer circuits were impacted by this load shed event.

5 **Q. Please continue.**

6 A. On February 16th, SPP again directed member utilities to implement their respective load
7 shedding plans for controlled curtailments of service. SPP initially directed Sunflower to
8 shed a total of 30 MW of load, but subsequently increased it to 60 MW of load. In response,
9 Sunflower began implementing rolling outages, rotating between its identified load
10 shedding blocks to impact customers for no longer than 60 minutes at a time. There were
11 several Southern Pioneer communities and meters impacted by this load shed event, which
12 lasted until 10:07 a.m.

13 **Q. How did Southern Pioneer respond to SPP's demands to conserve energy in an effort
14 to avoid rolling black outs?**

15 A. Upon receiving SPP's notice on February 14th, Southern Pioneer immediately made calls
16 to several of its large commercial and industrial accounts requesting these customers self-
17 generate or curtail usage. Up until February 19th, when SPP announced that it had returned
18 to normal operation, Sunflower continued to ask its distribution Members to make appeals
19 to its customers to continue to conserve energy to ensure system stability, which Southern
20 Pioneer continued to do.

1 **Q. How did customers respond to the requests?**

2 A. Our customers were very responsive. As a result of our requests to our customers, Southern
3 Pioneer customers voluntarily self-generated approximately 1200 kW (24,700 kWh) and
4 curtailed approximately 2400 kW (230,300 kWh) of load during the event.

5 **Q. How did the weather event affect power costs in the areas affected by the cold?**

6 A. Conditions during this time caused prices for natural gas to skyrocket from a prior week
7 average of approximately \$3.59/mmbtu, to as high as \$999/mmbtu. This in turn drove the
8 SPP market price for electricity to exorbitant levels. To illustrate, Sunflower on average
9 purchases load from the SPP Integrated Marketplace (IM) at a price of around \$20/MWh.
10 In contrast, at one point during the event, day-ahead market prices reached over
11 \$3,700/MWh.

12 **Q. Was Sunflower and its Members exposed to these high prices for all their load?**

13 A. Sunflower has a diverse generation portfolio that normally results in about an 89% hedge
14 against its purchases in the market. However, because Sunflower's gas generation units
15 were not able to consistently run due to the limited gas supply, coupled with the limited
16 wind output, Sunflower was only able to achieve a 66% hedge in the market during the
17 event. Therefore, approximately 34% of the Sunflower load purchases were exposed to
18 the extremely high day-ahead market prices.

19 **Q. Did Sunflower provide timely information to its Members so you could communicate
20 and coordinate with your customers?**

21 A. Yes. Southern Pioneer was in constant contact with Sunflower during the week of the
22 event, starting on Sunday February 14th when Sunflower notified Southern Pioneer of the
23 increase in market prices and the expectation of the impending week. That evening,
24 Southern Pioneer contacted several of its large commercial and industrial customers to let

1 them know of the increase in market prices. Additionally, Southern Pioneer's residential
2 customers were notified of the spike in market prices that same evening by way of a social
3 media post. This communication with Southern Pioneer's customers concerning high
4 power prices continued throughout the week in conjunction with the public appeal to
5 conserve energy for reliability purposes. Additionally, even after the event was over and
6 market prices began to come down to within normal ranges, Southern Pioneer continued
7 to urge its customers to conserve energy through the end of the month in order to mitigate
8 the power supply costs that would be allocated to Southern Pioneer and its customers based
9 on usage during the entire month of February.

10 **Q. What was the ultimate power cost impact on Sunflower?**

11 A. Sunflower estimates it incurred an additional \$92.5M in fuel and market costs for the event.
12 from February 10-20, 2021. This is close to its annual budget of \$100M. This is an
13 estimated amount as there remains market settlements and generation make-whole
14 payments to be reconciled over the next 30-90 days.

15 **Q. What was the specific impact on Southern Pioneer's cost of power?**

16 A. The impact of the weather event on Southern Pioneer was extreme. Based on the estimated
17 \$92.5M of incremental fuel and market extraordinary costs incurred by Sunflower, it
18 calculated an additional 28.4 cents per kWh ECA that was applied to all kWh usage for the
19 month of February and charged to Sunflower Members, including Southern Pioneer,
20 pursuant to the Sunflower Energy Adjustment Charge (ECA) Tariff. The budgeted
21 Sunflower ECA for the month of February is approximately 2.13 cents. Therefore, the
22 total Sunflower ECA for the month of February is approximately 30.5 cents. This total
23 ECA rate for the month of February was billed to Members, including Southern Pioneer,
24 on March 9, 2020. As a result, Southern Pioneer was allocated approximately \$17M of

1 the estimated extraordinary event costs. These extraordinary costs are solely for fuel and
2 market purchases from February 10–20, 2021.

3 **Q. How did the State of Kansas respond to the weather event?**

4 A. On February 14, 2021, Governor Kelly issued a State of Disaster Emergency due to the
5 wind chill warnings and stress on utility and natural gas providers, noting that the sub-zero
6 temperatures were causing increased energy demand and natural gas supply constraints
7 throughout Kansas, and utilities were experiencing wholesale natural gas price increases
8 from 10-100 times higher than normal.

9 Additionally, on February 15, 2021, the Commission issued its Emergency Order
10 pursuant to K.S.A. 77-536(a), acknowledging that increased energy demand, natural gas
11 supply constraints and dramatically higher prices could cause reliability issues, and that the
12 higher costs would eventually flow through to consumers in monthly utility bills. The
13 Commission authorized every jurisdictional electric and natural gas distribution utility that
14 incurs extraordinary costs associated with ensuring their customers or the customers of
15 interconnected Kansas utilities that are non-jurisdictional to the Commission continue to
16 receive utility service during this weather event to defer those costs to a regulatory asset
17 account.² The Commission provided a list of the types of costs to be deferred and stated
18 that such costs may also include carrying costs at the utility's weighted average cost of
19 capital.³ The Commission mandated that once the weather event is over and all costs have
20 been accumulated and recorded, each utility should file a compliance report detailing the

² Emergency Order, p. 2, ¶ 4.

³ *Id.*

1 extent of such costs incurred, and present a plan to minimize the financial impacts of this
2 event on ratepayers over a reasonable time frame.⁴

3 **Q. Is Southern Pioneer’s Application intended to comply with the Commission’s**
4 **Emergency Order?**

5 A. Yes. The Application and my supporting testimony constitute Southern Pioneer’s
6 compliance report, setting out Southern Pioneer’s proposed plan as ordered by the
7 Commission. Southern Pioneer is submitting for Commission approval its plan to recover
8 its extraordinary costs in a manner that minimizes the financial impacts of this extreme
9 weather event on its customers and allocates such costs fairly and equitably. The remainder
10 of my testimony will address the contents of the proposed plan.

11 **III. SOUTHERN PIONEER’S COMPLIANCE REPORT AND PLAN FOR COST**
12 **RECOVERY**

13
14 **Q. Please describe Southern Pioneer’s plan.**

15 A. As directed by the Commission in its Emergency Order, Southern Pioneer is placing its
16 extraordinary event-related power costs into a regulatory asset instead of passing them
17 through to customers in the ECA, as would normally be the case. The regulatory asset will
18 not accrue carrying costs. Instead, Southern Pioneer plans to carry the costs of the event
19 and not directly charge its customers interest as part of this plan. The carry costs, estimated
20 at 2-3%, will be reflected in base rates as part of Southern Pioneer’s annual formula-based
21 rate filing.

22 **Q. How will the amount of the regulatory asset be calculated?**

23 A. The initial amount of the regulatory asset will be based upon the wholesale power bill
24 Southern Pioneer received from Sunflower on March 9, 2021 for the extraordinary

⁴ *Id.*, at p. 3, ¶ 5.

1 incremental fuel and market costs incurred by Sunflower during the event, from February
2 10-20, 2021. This amount could be adjusted over the next 60-90 days to reflect market
3 resettlements and generation make-whole payments not presently known. Additionally,
4 there could be government assistance payments received in the future that would need to
5 be credited to customers, as well.

6 **Q. Are you requesting the Commission make a determination at this time as to the**
7 **reasonableness and prudence of these costs?**

8 A. Yes. Although this is an estimated amount because there remains market settlements and
9 generation make-whole payments to be reconciled over the next 30-90 days, the data we
10 have at this time is sufficient to allow the Commission to make this determination.
11 Southern Pioneer will update the data for these minor adjustments when they are known,
12 at which time the Commission can make its determination as to the modified amounts.

13 **Q. How does the plan propose the regulatory asset will be recovered?**

14 A. The goal of the rate plan is to recover these extraordinary event costs in a way that allocates
15 them fairly to customers based upon actual kWh usage during the month the costs were
16 incurred and spread recovery out over a sufficient period of time to make it manageable
17 and affordable for our customers. Under the plan, the regulatory asset will be recovered
18 from customers in the following manner:

19 a. Each customer's share of the incremental event costs will be computed based upon
20 their kWh usage during the entire month of February 2021.

21 b. The amount calculated will be recovered in equal monthly payments over a thirty-
22 six (36) month period. Large industrial customers will have the option of paying

1 their obligation in fewer than thirty-six months if they provide notice to Southern
2 Pioneer.

3 c. If a customer disconnects service, the amount still owed on this charge will be
4 included as part of the disconnect fee for that customer and collected accordingly.

5 **Q. Please provide an example of how the computation will be made and recovered from**
6 **a customer.**

7 A. As discussed above, the total incremental cost of the event, resulting in a Sunflower ECA
8 of 28.4 cents, will be applied to each customer's total kWh usage during the month of
9 February, to compute a total incremental cost amount for each Southern Pioneer customer.
10 That total incremental cost amount will then be divided by 36, to come up with a monthly
11 incremental cost for each customer. That monthly incremental cost will be displayed on
12 monthly bills by way of a separate miscellaneous line item charge. There will be no
13 changes or impacts to the monthly Southern Pioneer ECA or any other Southern Pioneer
14 rate as a result of this event.

15 The following is an example of an average 1,000 kWh monthly residential bill if
16 the proposed plan is approved. It would result in a monthly additional amount of \$7.89 for
17 the event.

EXAMPLE (based on 1,000 kWh usage)	
<i>Feb. kWh</i>	<i>1,000</i>
<i>*Additional Cost per kWh in Feb.</i>	<i>\$0.284</i>
<i>*Total additional Cost in Feb.</i>	<i>\$284.00</i>
<i>*Recovery Period (Months)</i>	<i>36</i>
**Monthly Feb. 2021 Storm Recovery Charge	\$7.89

18

1 In summary, for every 1,000 kWh used, a Southern Pioneer customer (whether residential
2 or commercial & industrial) will be billed an additional total amount of \$284, paid in equal
3 installments over the thirty-six month recovery period.

4 **Q. Please explain how Southern Pioneer plans to structure the charge for any subsequent**
5 **changes to the initial amount of the regulatory asset.**

6 A. As stated above, the initial amount of the regulatory asset could be adjusted over the next
7 60-90 days to reflect market resettlements and generation make-whole payments not
8 presently known. To the extent these later adjustments are minimal and not material to the
9 overall amount of the regulatory asset, Southern Pioneer is requesting it have the option of
10 passing them through its ECA rather than accruing them in the regulatory asset. If not
11 minimal, then Southern Pioneer will allocate them to customers in the same manner as the
12 regulatory asset is allocated and will include them on the customers' bills over the
13 remainder of the thirty-six (36) month period as a separate special charge.

14 Similarly, there may be money received from the government in the future to assist
15 with the extraordinary costs. If government assistance on the February power costs is
16 received by Southern Pioneer, that amount will also be allocated to customers in the same
17 manner as the regulatory asset and a separate charge for only that assistance will be
18 included as a credit on the customers' bills over the remainder of the thirty-six (36) month
19 period. Although this approach could result in there being three separate charges/credits
20 on a customer's bill related to the severe weather event, Southern Pioneer believes doing
21 it this way will simplify administration and be more transparent and understandable to

1 customers since it refrains from modifying the regulatory asset once the monthly charge is
2 calculated and communicated to the customer.

3 **Q. Why is Southern Pioneer using February usage to compute the charges?**

4 A. Because we believe this is the only fair and equitable way to address the charges. As I said
5 above, our customers were very responsive to our requests that they self-generate or curtail
6 load, not only to mitigate the impact of power costs allocated to Southern Pioneer and its
7 customers, but also to mitigate the risk of additional and protracted rolling outages that
8 existed across the SPP footprint during the week. Under our proposal, customers who
9 reduced their load as requested will benefit by having fewer kWhs exposed to the high
10 Sunflower ECA rate of 28.4 cents, thus rewarding them for their contribution to the overall
11 effort and encouraging them to cooperate again in the future should the need arise.

12 **Q. How would the recovery of these costs normally occur?**

13 A. Power costs are usually recovered through Southern Pioneer's ECA tariff, which provides
14 that monthly power costs are applied across a customer's total kWhs in the month. Because
15 Southern Pioneer has seven billing cycles, there is a lag in aligning power costs incurred
16 with usage in the same month. In other words, in practice, February power costs would
17 normally be applied to future kWh usage in the months of March and April, instead of
18 February usage.

19 **Q. Why is this method not equitable for these costs?**

20 A. The ECA is reasonable under normal circumstances where costs and customers' usage is
21 normal. But in this case, costs were extreme, which warrants the additional effort to
22 correlate the allocation to actual usage during the relevant month. Additionally, customers
23 were asked to voluntarily reduce usage February 14th -19th by modifying their activities
24 and operations and by self-generating if they owned generation. Customers were also then

1 asked to continue their conservation efforts through the end of February to limit Southern
2 Pioneer and its customers exposure to the high power costs since the event costs would be
3 applied by Sunflower to all kWhs used by Southern Pioneer in the month of February.
4 Customers who responded to that plea and worked with Southern Pioneer to achieve a
5 reduction in usage should be given consideration when determining the appropriate
6 allocation of costs. If a customer voluntarily accepted reductions in revenues and/or
7 increased their private cost from self-generation to assist us, we do not want to assign them
8 costs based upon their usage in March when everyone has gone back to their normal level
9 of usage. To do that would undermine future efforts to obtain voluntary load reductions
10 from these customers if they are not treated fairly in this case. It is important to remember
11 that the customers who worked with us to lower our load positively helped all our
12 customers by mitigating the overall costs assigned to Southern Pioneer for these sky-
13 rocketing prices, in addition to mitigating the chance of additional rolling outages across
14 the system.

15 **Q. Why did Southern Pioneer choose thirty-six (36) months for recovery of the**
16 **regulatory asset?**

17 A. It involved a balancing of various factors. We wanted a period of time long enough that
18 the monthly bill impact would be reasonable for our customers, but not so long that it would
19 be a financial hardship on the company or incur unnecessary carrying costs that our
20 customers ultimately have to pay. With the time period chosen, the impact on an average
21 customer bill will be approximately \$7.89/month and Southern Pioneer believes the
22 financial impact and costs for the company are acceptable.

1 **Q. How will Southern Pioneer finance the regulatory asset for the three-year**
2 **amortization period?**

3 A. Southern Pioneer is working with its lender, CoBank, to establish short-term financing
4 needed to cover purchased power cost associated with the event. This short-term financing
5 will either be in the form of interest only lines of credit or a thirty-six month term loan.
6 Southern Pioneer looks to minimize interest expense and overall debt service, while
7 maintaining flexibility to meet the cash needs over the recovery period.

8 **Q. Is your proposal inconsistent with the ECA?**

9 A. Not necessarily, but to be sure it is not an issue, we are requesting the Commission's
10 order on our Application make clear that the ECA is waived for recovery of these costs
11 to the extent such waiver is necessary.

12 **IV. REQUEST FOR EXPEDITED INTERIM ORDER**
13

14 **Q. Why is Southern Pioneer requesting an Expedited Interim Order regarding**
15 **disconnects?**

16 A. Again, this is to be fair and responsive to our customers. Southern Pioneer will not be
17 charging the regulatory asset to bills until the Commission issues a final order in this
18 docket, which could be in April or even early May. Customers who terminate service for
19 one reason or another before that time will not have paid for any of their share of the
20 February power costs. Once they are no longer customers, Southern Pioneer will not be
21 able to collect from them the amount of the regulatory asset ultimately determined to be
22 their responsibility in this case.

23 Additionally, Southern Pioneer has one large industrial customer that expressed its
24 preference to pay the full amount of its obligation for February power costs in one payment
25 on its April bill that will issue no later than April 10, 2021. This request benefits Southern

1 Pioneer and other customers, but since the billing would occur before a final order is issued
2 in this docket and the treatment is not completely consistent with Southern Pioneer's
3 present ECA, we believe an Interim Order is needed to allow Southern Pioneer to comply
4 with the customer's request.

5 **Q. What are you seeking in the Interim Order?**

6 A. Southern Pioneer is requesting an Interim Order be issued within ten (10) days of the filing
7 of this Application that will allow us to estimate the amount of the regulatory asset a
8 disconnecting customer is responsible for and add it as a charge to their final bill. When
9 the final order issues in this docket we will true-up the estimated amount and, if the estimate
10 was higher than the amount actually owed, we will give the customer a credit. If the
11 amount is lower, we will not make any adjustment to the initial estimated charge.
12 Additionally, we are asking that the Interim Order allow Southern Pioneer to charge its one
13 large industrial customer the full amount of its obligation for extraordinary power costs
14 incurred in February on the customer's April bill instead of through the regulatory asset
15 allocation.

16 **Q. Will the disconnecting customer be allowed to pay the charge over thirty-six (36)**
17 **months like the plan provides for other customers?**

18 A. Yes. As part of the final bill, we will notify the customer of their right to make payments
19 on the charge over the same length of time as proposed in the plan.

20 **Q. Does this conclude your testimony?**

21 A. Yes, it does.

VERIFICATION

STATE OF KANSAS)
) ss
COUNTY OF GRANT)

The undersigned, Chantry C. Scott, upon oath first duly sworn, states that he is an officer of Southern Pioneer Electric Company, and that he has prepared the foregoing testimony, that he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.



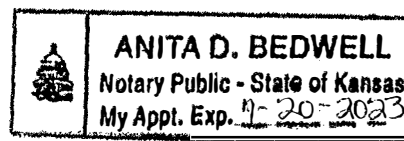
Chantry C. Scott

Subscribed and sworn to before me this 10th day of March, 2021.



Notary Public

My appointment expires: 7-20-2023



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing testimony was electronically served this 10th day of March, 2021 to:

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