

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

In the Matter of the Investigation into Kansas )  
Gas Service Company, a Division of One Gas )  
Inc. Regarding the February 2021 Winter ) Docket No. 21-KGSG-332-GIG  
Weather Events, as Contemplated by Docket )  
No. 21-GIMX-303-MIS. )

**MOTION TO AMEND AND CORRECT THE AMOUNT OF DOCUMENTED  
FEBRUARY 2021 COSTS ASSOCIATED WITH WINTER STORM URI – ON A KCC  
JURISDICTIONAL AND NON-JURISDICTIONAL BASIS**

COMES NOW the Natural Gas Transportation Customer Coalition (“NGTCC”) and for its Motion, states to the State Corporation Commission of the state of Kansas (“KCC” or “Commission”) as follows:

**Procedural History**

1. NGTCC reiterates as if fully set forth herein, Paragraphs 1 – 5 of its Motion in this Docket, as filed on July 30, 2021.

2. At Paragraphs Nos. 18, 24, and 25, and at Footnote 6 – NGTCC indicated that the documented increased costs associated with Winter Storm Uri, to be recovered from KCC jurisdictional ratepayers, and from ratepayers of municipal utilities and electric cooperatives was \$840 million - for essentially 7 days of natural gas purchases (including, to a lesser degree, purchases of electric energy.) **This amount was incorrect, and the documented – but as of yet incomplete amount, is \$953,875,951.<sup>1</sup>**

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<sup>1</sup> This amount does not include the February 2021 costs of KEPCO, if any, as no public statement of KEPCO is available. This amount also does not include the substantial costs incurred by transportation customers. For example, on KGS, there are 6,297 transportation customers that account for a very material amount of those volumes delivered by KGS in February 2021. **The total amount of ratepayer and customer costs in Kansas from Winter Storm Uri in February 2021 exceeded One Billion Dollars.**

3. **The documented KCC jurisdictional amounts are \$770,966,305.**

American Energy Gas Service – \$317,913 – February 2021 costs

**KCC Docket No. 21-AEGG-335-GIG KCC Order Approving – July 8, 2021**

<https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202106181439436872.pdf?Id=a092af5a-3622-4c12-9d6f-c81cee939cb6>

City of Eskridge - \$1,158,730 – February 2021 costs

**KCC Docket No. 21-GIMX-303-MIS KCC Order Approving dated July 13, 2021**

<https://estar.kcc.ks.gov/estar/ViewFile.aspx/20210713110055.pdf?Id=359e21bc-599f-4519-94a0-4e9188ec9c3b>

Black Hills Gas / Kansas - \$87,897,744 - February 2021 costs

**KCC Docket – Docket No. 21-BHCG-334-GIG Pending**

<https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202106161631452455.pdf?Id=2becefab-29fd-4444-b115-ce9d65f2983f>

Kansas Gas Service - \$451,657,888 - February 2021 costs

**KCC Docket No. 21-KGSG-332-GIG Pending**

<https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202107301402167520.pdf?Id=d50f1d81-e90f-4b11-a6f4-52761e17d0cf>

Atmos Energy – \$76.7 million Estimated from SEC – Form 10-Q for Quarter ended March 31, 2021

**KCC Docket No. 21-ATMG-333-GIG - Financial Recovery Plan Not Yet Filed**

<https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202106111258087069.pdf?Id=ab6ce0b6-9251-47ec-8456-8d0a0435c27a> at p. 8

Evergy Kansas Central – Electric - \$153,234,030 - February 2021 costs

**KCC Docket No. 21-EKME-329-GIE Pending**

<https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202107021628058324.pdf?Id=9eb2e8b2-17b0-4d83-a54f-ae8da22530b5> p. 38 / Exhibit B, p. 10

4. **The documented non KCC jurisdictional amounts are \$182,909,646.**

**Kansas Legislature – Municipal Utility Loan Program**

**\$78,409,646 – February 2021 costs**

**[https://www.kansasstatetreasurer.com/assets/Files/loan\\_program\\_update\\_20210613.pdf](https://www.kansasstatetreasurer.com/assets/Files/loan_program_update_20210613.pdf)**

**Sunflower Electric - \$92.5 Million - February 2021 costs**

“Sunflower estimates it incurred an additional \$92.5M in fuel and market costs for the event.”

**<https://estar.kcc.ks.gov/estar/ViewFile.aspx/S202103101410027302.pdf?Id=f829f7bc-b829-4f7a-8158-74389a91cafa>**

Southern Pioneer at p. 6

**Midwest Energy - \$12 million – February 2021 costs**

**<https://www.mwenergy.com/news/view/midwest-energy-announces-natural-gas-cost-recovery-plan>**

## CONCLUSION

The NGTCC respectfully moves the Commission to Amend and Correct the Amount of Documented February 2021 Costs Associated with Winter Storm Uri – On a KCC Jurisdictional and Non-Jurisdictional Basis, as set forth herein.

Respectfully submitted,

/s/ James P. Zakoura

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**VERIFICATION**

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF JOHNSON        )

James P. Zakoura, being duly sworn upon his oath, deposes and states that he is the Attorney for the Natural Gas Transportation Customer Coalition, that he has read and is familiar with the foregoing *Motion to Amend and Correct the Amount of Documented February 2021 Costs Associated with Winter Storm Uri – on a KCC Jurisdictional and Non-Jurisdictional Basis*, and that the statements therein are true to the best of his knowledge, information, and belief.

  
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James P. Zakoura

SUBSCRIBED AND SWORN to before me this 2nd day of August 2021.

  
\_\_\_\_\_

Notary Public

My Appointment Expires:



**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of August 2021, the foregoing *Motion to Amend and Correct the Amount of Documented February 2021 Costs Associated with Winter Storm Uri – on a KCC Jurisdictional and Non-Jurisdictional Basis* was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

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