

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of the Gas)
Utilities for a Waiver to the Commission's Electric and)
Natural Gas Utilities' Billing Standards Related to) Docket No. 24-GIMG-453-GIG
Allow for a Permanent Discontinuance of the Knock)
and Collect Provision in Said Billing Standards.)

**REPLY OF KANSAS GAS SERVICE TO CURB'S
RESPONSE TO STAFF'S REPORT AND RECOMMENDATION**

Kansas Gas Service, a Division of ONE Gas, Inc. ("Kansas Gas Service"), submits the following reply to the November 15, 2024, response filed by the Citizens' Utility Ratepayer Board ("CURB") ("CURB Response")¹ to the November 6, 2024, report and recommendation filed by the Kansas Corporation Commission Staff ("Commission" and "Staff" respectively) ("Staff R&R").² Staff has recommended that (1) the Commission grant the gas utilities permanent waiver of the knock and collect provision of the Billing Standards; (2) disconnection and re-connection fees be reinstated; and (3) the gas utilities maintain their disconnection procedures that a technician encountering a customer during a disconnection visit should provide the customer a reasonable opportunity to make payment by phone or online to avoid disconnection, if so requested by the customer.³ CURB is not opposed to the Commission granting the gas utilities a permanent waiver of the knock and collect provision of the Billing Standards.⁴ CURB asks the Commission to require the gas utilities to apply the same disconnection and re-connection fees (if any) to each of the utility's customers regardless of whether

¹The Citizens' Utility Ratepayer Board Response to Staff's Report and Recommendation filed November 15, 2024, Docket No. 24-GIMG-453-GIG ("24-453 Docket").

²Notice of Filing of Staff's Report and Recommendation filed November 6, 2024, 24-453 Docket.

³*Id.*, page 1.

⁴CURB Response, page 9, paragraph 15; page 15, paragraph 30.

the cause was for non-payment or at the customer's request.⁵ CURB recommends the Commission remove the portions of the Billing Standards which specifically require disconnection fees and re-connection fees be charged in circumstances of non-payment and instead have those costs socialized.⁶ Finally, CURB asks the Commission to express its support for all Kansas utilities to continue to work with Staff, CURB and other interested stakeholders to reduce energy insecurity in Kansas.⁷ Kansas Gas Service wishes to reply to the recommendations included in CURB's Response and to the extent that such recommendations overlap with Staff's recommendations to address those overlapping recommendations. Kansas Gas Service also wishes to clarify the utility's practice with respect to one aspect of its disconnection procedures. Both Staff and CURB provide summaries of the history relating to the Commission's original knock and collect waiver docket, Docket No. 15-GIMX-344-GIV ("15-344 Docket"), and the instant docket that arose as a result of the 15-344 Docket, so said background information will not be restated in this Reply.⁸

I. THERE IS NO OPPOSITION TO THE COMMISSION GRANTING A PERMANENT WAIVER OF THE KNOCK AND COLLECT PROVISION OF THE BILLING STANDARDS AND SO SUCH WAIVER SHOULD BE APPROVED

1. CURB is not opposed to the permanent waiver of the knock and collect provision of the billing standards as requested by the gas utilities⁹ and Staff is recommending the Commission grant such request.¹⁰ Since there is no opposition to the permanent waiver of the knock and collect provision of the billing standards, Kansas Gas Service asks that its request be approved.

⁵*Id.*, page 9, paragraph 15; *Id.*, page 20, paragraph 4.

⁶*Id.*, page 18, paragraph 36; page 20, paragraph 42.

⁷*Id.*, page 20, paragraph 44.

⁸Staff R&R, pages 1-2; CURB Response, pages 1-8, paragraphs 1-12.

⁹CURB Response, page 9, paragraph 15; page 15, paragraph 30.

¹⁰Staff R&R, page 1.

2. Kansas Gas Service pointed out that one of the reasons for eliminating the practice of knock and collect was to reduce the risk of scam artists or imposters taking advantage of customers.¹¹ CURB recognized that such a goal was worthwhile and provided value to customers generally, but questioned whether the elimination of the practice would really reduce such risk.¹² As recognized by CURB in its response, it is the combination of eliminating the knock and collect practice with the utility providing periodic notice to customers as to how Kansas Gas Service will routinely interact or not interact with customers (utility customers are informed and understand that no utility will attempt to collect a past-due amount personally at the customer's premise), including the reminder to customers to be aware of the risk of scam artists or imposters, that will provide protection to customers of such risks.¹³ In addition, Kansas Gas Service would point the Commission to a recent news article that unfortunately shows how such risks continue to be real: <https://www.foxnews.com/us/doorbell-video-shows-murder-suspects-pose-as-energy-workers-before-allegedly-killing-jewelry-store-owner>. This news article dated October 12, 2024, describes how two suspects pretending to be gas utility employees were able to gain access to a residence in order to rob the residence. The news article also includes a video of doorbell footage of the suspects where one of the suspects is seen telling the resident he is with the local gas utility and is there to check for gas leaks. Tragically, one of the residents was killed by the intruders during the robbery.

3. Kansas Gas Service pointed out that another reason to eliminate the knock and collect procedure was to reduce field situations where an employee's life has been threatened.¹⁴ CURB again

¹¹Joint Application filed December 15, 2023, 24-453 Docket, page 2, paragraph 3(b) ("Joint Application").

¹²CURB Response, pages 9-10, paragraph 16; pages 10-11, paragraph 18.

¹³*Id.*, at pages 10-11, paragraph 18.

¹⁴Joint Application, page 2, paragraph 3(c).

acknowledged that such a goal is worthwhile, but raised the concern about the safety of the employee, who is charged with disconnecting utility service for nonpayment, from a customer who may be unaware of the reason for the employee's presence on the customer's property.¹⁵ While that risk can't be completely eliminated, and Kansas Gas Service appreciates CURB's recognition of that risk, the additional notices of disconnection by text and phone calls provided to the customer as part of the elimination of the knock and collect practice should provide reasonable notice to the customer so they should be aware of the reason why the Kansas Gas Service employee is at the premise and such additional notice should avoid any apprehension by the customer.

4. CURB recognized the other reason given for eliminating the knock and collect procedure, which was to remove the potential embarrassment of the customer, and CURB appreciated Kansas Gas Service's efforts to be humane around collecting past due bills.¹⁶

5. In addition to the reasons given by the gas utilities for eliminating knock and collect, CURB identified other reasons which Kansas Gas Service agrees with CURB.¹⁷ For example, CURB correctly pointed out that circumstances pertaining to energy billing information and utility billing payment options have materially changed since the knock and collect requirement was first placed in the billing standards making it less important now to maintain that requirement.¹⁸

6. Finally, CURB concluded that "all of the rationale posited by the Applicants reasonably justify the elimination of the knock and collect requirements in this docket because CURB does not see any material benefit from maintaining these requirements."¹⁹ Accordingly, because Staff is

¹⁵CURB Response, page 10, paragraph 17.

¹⁶*Id.* at page 11, paragraph 19.

¹⁷*Id.* at pages 12-13, paragraphs 21-24.

¹⁸*Id.* at pages 12-13, paragraphs 22-23.

¹⁹*Id.* at page 11, paragraph 20.

recommending approval of the permanent waiver of the knock and collect procedure contained in the Billing Standards in its report and recommendation and CURB is not opposed to said waiver, the Commission should grant the request by the gas utilities to permanently waive the knock and collect procedure.

II. DISCONNECTION AND RE-CONNECTION FEES SHOULD BE REINSTATED TO FEE LEVELS EXISTING BEFORE THE PILOT PROGRAM IN THE 15-344 DOCKET AS RECOMMENDED BY STAFF

7. CURB disagrees with Staff's recommendation that disconnection and re-connection fees should be reinstated and reset to the last Commission-approved fees specific to each utility.²⁰ Staff's position was that such fees should be reinstated to avoid subsidization by other customers having to pay for costs caused by the customer who is being disconnected or reconnected.²¹ CURB proposes the Commission have no disconnection and re-connection fee in circumstances of non-payment and to socialize those costs because such fees hurt those customers who already cannot afford their energy bills.²² CURB proposes that all three gas utilities have disconnection/re-connection fees not due to non-payment.²³ CURB also suggests that the gas utilities have not provided cost support to justify reinstating their prior fee structures, and in Kansas Gas Service's case, adequate cost support to justify the difference in the disconnection charge for non-payment and the disconnection charge where the disconnection is being done at the request of the customer.²⁴ Kansas Gas Service disagrees with CURB and supports Staff's position.

8. Kansas Gas Service agrees with Staff that disconnection/re-connection fees are

²⁰*Id.* at page 16, paragraph 32.

²¹Staff R&R, page 1.

²²CURB Response, page 18, paragraph 36; page 20, paragraph 42.

²³*Id.* at page 20, paragraph 41.

²⁴CURB Response, page 19, paragraph 39.

necessary in order to avoid subsidization by other customers having to pay for costs caused by the customer who is being disconnected or re-connected. To the extent the Commission agrees with CURB and decides to socialize those costs, then such will need to be done in the gas utilities' next general rate case so that such costs are recovered in base rates at the time the fees are eliminated.

9. Contrary to CURB's suggestion, Kansas Gas Service has provided cost support for its initiation, disconnection and re-connection charges that were in effect prior to the Pilot Program initiated in the 15-344 Docket, including support for the difference in fees based upon the circumstances surrounding the disconnection. Such cost support was provided to Staff and CURB in Kansas Gas Service's 2018 rate case as part of discovery response to Data Request KCC Staff-127, in Docket No. 18-KGSG-560-RTS. A copy of that response is attached hereto as Exhibit A and incorporated herein by reference.²⁵

III. KANSAS GAS SERVICE AGREES TO CONTINUE TO WORK WITH CURB, THE OTHER GAS AND ELECTRIC UTILITIES, STAFF, THE COMMISSION AND OTHER STAKEHOLDERS ON ENERGY INSECURITY

10. CURB acknowledges that the knock and collect requirement can be waived without consideration of energy insecurity.²⁶ However, CURB asks the Commission to provide support and direction to all of the stakeholders to continue to work together on things that can be done to address energy insecurity.²⁷ Kansas Gas Service agrees to continue to work with CURB, Staff and other stakeholders on energy insecurity. Recently, Kansas Gas Service has worked with CURB and Staff

²⁵Response to KCC Staff Data Request-127, Docket No. 18-KGSG-560-RTS (attached to this Reply as Exhibit A).

²⁶CURB Response, page 41, paragraph 87 ("CURB is certainly aware that this docket can be concluded without addressing public need to address energy security.").

²⁷*Id.*, page 42.

on this issue and necessary changes in the law before the legislature.²⁸ In its most recent general rate case, Kansas Gas Service conducted and submitted a study to identify usage characteristics of its low-income customers and based upon the results of that study proposed a change in its residential rate design to assist both low-income customers, who have the ability to maintain relatively low usage of natural gas due to the size of their home or apartment, and low-income customers who have relatively high usage of natural gas because of insufficient insulation and the age of the house or apartment that they live in.²⁹ If that rate design would have been approved such would have provided rate relief for those low-income customers.³⁰ Currently, Kansas Gas Service and the other gas utilities are working with Staff and CURB on a collaborative effort to attempt to modify some of the energy efficiency policy provisions that were established in 2008, that if approved by the Commission, would allow them to file a more robust set of energy efficiency programs.³¹ Kansas Gas Service is excited to include in such a filing energy efficiency programs that will assist low-income customers. Focus on changing the current law, putting forward innovative rate design proposals in rate cases and energy efficiency programs directed at assisting low-income customers will best addresses energy insecurity in Kansas and Kansas Gas Service is willing to continue to work in those areas with CURB and other stakeholders to address energy insecurity faced by utility customers.

IV. CLARIFICATION OF KANSAS GAS SERVICE'S DISCONNECTION PRACTICES FOR NON-PAYMENT

11. In response to a data request issued in this docket, Kansas Gas Service did indicate that some technicians when encountering a customer during a disconnection visit will provide the customer

²⁸CURB Response, page 30, paragraph 61 (CURB thanks utilities for work on HB 2156).

²⁹*Id.*, pages 30-31, paragraph 62.


³⁰*Id.*

³¹*Id.*, page 31, paragraph 63.

a reasonable opportunity to make payment by phone or online to avoid disconnection, if so requested by the customer. However, that is the exception to Kansas Gas Service's disconnection practice and it is Kansas Gas Service's preference that it not be required to delay disconnection if requested by the customer since that customer has been provided numerous chances to make payment.

WHEREFORE, Kansas Gas Service respectfully requests that the Commission issue an order:

- (1) granting a permanent waiver of the knock and collect provision of the Billing Standards;
- (2) approving the reinstatement of the disconnection/re-connection fees to the levels approved in Kansas Gas Service's most recent rate case; and
- (3) finding that Kansas Gas Service is not required to delay disconnection if requested by the customer at the time the technician is at the residence to disconnect service to allow the customer additional time to pay its outstanding bill.



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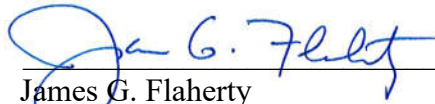
Attorneys for Kansas Gas Service,
a Division of ONE Gas, Inc.

VERIFICATION

STATE OF KANSAS
COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states:

That he is the attorney for Kansas Gas Service, a Division of ONE Gas, Inc., named in the foregoing Reply of Kansas Gas Service to CURB's Response to Staff's Report and Recommendation and is duly authorized to make this affidavit; that he has read the foregoing and knows the contents thereof; and that the facts set forth therein are true and correct.



James G. Flaherty

SUBSCRIBED AND SWORN to before me this 27th day of November, 2024.





Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 27th day of November, 2024, addressed to:

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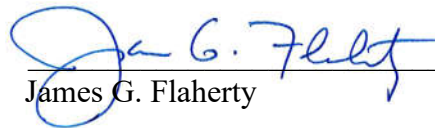
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Kansas Corporation Commission

Docket Number 18-KGSG-560-RTS

Information Request

EXHIBIT A

Data Request: 18-560 KCC-127: Increases to Miscellaneous Charges

Company Name: Kansas Gas Service, a Division of ONE Gas, Inc.

Request Date: 8/14/2018

Date Information Needed: 8/23/2018

Requested By: Darren Prince

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Please provide the following:

Please provide cost-based support for the proposed increases to Miscellaneous Charges in Schedule GTC12 (Service Initiation Charge, Collection or Disconnection Charge, and Reconnection Charge).

KGS Response:

Please see, 18-560 KCC-127 Attachment which calculates three year average costs per order type associated with the related service charges.

Prepared by: Kevin Kersting

Verification of Response

I have read the foregoing Information Request and answer(s) thereto and find answer(s) to be true, accurate, full and complete and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request.

Signed: Janet Buchanan

Date: 8/20/2018

Unit Cost by FERC Major

FERC	Events	Costs	Unit \$
1840	90151	\$ 7,243,166.00	\$ 80.34
8780	773290	\$ 11,670,376.00	\$ 15.09
9030	116277	\$ 2,758,432.00	\$ 23.72
TOT	979718	\$ 21,671,974.00	\$ 22.12

Service Initiation
Collection/Disconnection
Reconnections

Unit Cost by UCBSVCO_CODE

UCBSVCO_CODE	Unit \$
202 - Meter Change	\$ 15.09
210 - Turn Off - Non Pay	\$ 23.72
210P - Residential Non-Pay, Pay Arrangement Eligible	\$ 23.72
211 - Turn Off - Non Pay Public Service	\$ 23.72
212 - Turn Off - Non Pay Returned Check	\$ 23.72
213 - Turn Meter Off - SDP Use/Time/Other	\$ 23.72
222 - Meter Change Non Residential	\$ 15.09
266 - Remove - 12 Inact Non Res	\$ 15.09
301 - Relight - Off by Service	\$ 15.09
302 - Relight - Off by Crew	\$ 15.09
303 - Relight	\$ 15.09
304 - Furnace Lite Up Program	\$ 15.09
305 - Inactive w/use	\$ 15.09
311 - Paint Meter	\$ 15.09
314 - Change Stop	\$ 80.34
405 - Remove/Kill Service Line	\$ 80.34
501 - MVIN-Turn On Meter Inactive	\$ 15.09
502 - MVIN-Read Only Meter Active	\$ 15.09
503 - MVIN-Turn On Bill Paid	\$ 15.09
504 - MVIN-Meter Set Turn On	\$ 15.09
505 - MVOT-Turn Off	\$ 15.09
506 - MVIN-Meter Set Bill Paid	\$ 15.09
507 - MVIN-Turn On Meter SDP	\$ 15.09
508 - MVOT-Read Only Default Cust Revert	\$ 15.09
509 - New Meter Set, Residential	\$ 80.34
511 - MVIN-Turn On Mtd Inact Non Res	\$ 15.09
533 - MVIN-Turn On Bill Paid Non Res	\$ 15.09
544 - MVIN-Mtr Set Turn On Non Res	\$ 15.09
566 - MVIN-Mtr Set Bill Paid Non Res	\$ 15.09
599 - New Meter Set, Non-Residential	\$ 80.34
602 - SVC Line Survey-Svc Dpt Field Use	\$ 15.09
607 - Meter Change - Sample Test	\$ 15.09
677 - Mtr Change-Sample Test Non Res	\$ 15.09
808 - EPL Retrofit	\$ 80.34
901 - New Serviceline Request (Construction)	\$ 80.34
903 - Replace Serviceline (Construction)	\$ 80.34
904 - Retire/Kill Serviceline (Construction)	\$ 80.34