

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

IN THE MATTER OF THE APPLICATION]	
OF SOUTHERN PIONEER ELECTRIC]	
COMPANY FOR APPROVAL TO MAKE]	KCC DOCKET NO. 25-SPEE-353-TAR
CERTAIN CHANGES TO ITS RULES]	
AND REGULATIONS TARIFF]	

DIRECT TESTIMONY OF
PATRICK ORR

ON BEHALF OF

THE CITIZENS' UTILITY RATEPAYER BOARD

JUNE 27, 2025

I. STATEMENT OF QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Patrick N. Orr, and my business address is 1500 SW Arrowhead Road,
Topeka, Kansas 66604.

Q. By whom are you employed and in what capacity?

A. I am employed by the Kansas Citizens' Utility Ratepayer Board ("CURB") as a
Regulatory Analyst.

Q. Please summarize your professional experience in the utility industry.

A. I have been employed as a rate analyst with CURB since 2019. Since the beginning
my employment with CURB, I have researched and analyzed various utility dockets filed
with the Kansas Corporation Commission ("KCC" or "Commission").

Q. Have you previously testified before the Commission?

A. Yes, I have testified in a number of dockets before the Commission. A list can be
provided upon request.

Q. What is your educational and professional background?

A. I have a Bachelor of Business Administration degree in Finance and Personnel
Management from Washburn University (1980). I worked for the Kansas Department of

Administration for thirty years. In that position, I was responsible for preparing rates for information technology (IT) services in accordance with *Circular A-87 Cost Principles for State, Local and Indian Tribal governments*.

II. PURPOSE OF TESTIMONY

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

A. The purpose of my testimony is to provide CURB's position regarding Southern Pioneer Electric Company's ("Company" or "Southern Pioneer") Application requesting approval of certain changes to their Rules and Regulations ("R&R") as requested in the 25-SPEE-353-TAR Docket ("25-353 Docket").

Q. Please provide a historical overview of Southern Pioneer.

A. Southern Pioneer was formed in 2005 in response to Aquila Networks-WPK's ("Aquila") announcement of its intention to sell its Kansas electric assets. Five member-owner cooperatives of Sunflower Electric and Southern Pioneer, a wholly owned subsidiary of Pioneer Electric ("Pioneer"), joined to form Mid-Kansas Electric Company, Inc. ("Mid-Kansas"), a not-for-profit corporation, to acquire and serve the former Aquila service territory. After KCC approval of the Aquila and Mid-Kansas Joint Application in Docket No. 06-MKEE-524-ACQ, the Company began to serve and independently operate a designated geographic portion of the certificated territory transferred from Aquila to Mid-

1 Kansas.¹ The Company is a non-profit corporation, serving over 17,000 retail meters and
2 four third-party wholesale customers.

3 This background makes the Company unique in its operations. The Company is a
4 wholly owned subsidiary of Pioneer and is managed and operated largely by trustees,
5 managers, and employees that also own and manage Pioneer, but it is regulated by the
6 Commission.

7
8 **Q. Why is the Company proposing changes to its Rules and Regulations at this time?**

9 A. The Company believes it is important to maintain operational consistency between
10 the two organizations.² While Pioneer can make changes to its R&R without Commission
11 approval, the Company must initiate a docket and obtain approval from the Commission
12 for any changes it wishes to make. This can require a significant amount of time and
13 resources for the Company relative to other larger regulated utilities. Therefore, the
14 Company is reluctant to make frequent minor changes to its R&R and only seeks to make
15 formal changes to its policies when necessary.³

16
17 **Q. What reasons does Southern Pioneer give for making changes to its R&R?**

18 A. Company witness Chantry Scott states in his direct testimony that the Company has

1. Direct Testimony of Chantry Scott, Executive VP-Chief Financial Officer, Docket No. 25-SPEE-353-TAR Southern Pioneer Electric Company, on Behalf of Mid-Kansas Electric Company, LLC, dated March 14, 2025, pages 4-6.

2. Id, p. 7.

3. Id, p. 7.

1 made limited revisions to its R&R since they were initially adopted in 2007 after the
2 approval of the Aquilla acquisition. In the interim, industry and corporate changes have
3 occurred that warrant revisions of its R&R.⁴ Mr. Scott provides several reasons why the
4 Company seeks Commission approval to make changes to its R&R.

- 5 1. Changes are needed to take advantage of new technologies that will provide better
6 delivery of service to its customers. Advancements in new technologies dealing
7 with Advanced Metering Infrastructure (“AMI”) and Interactive Voice Response
8 (“IVR”) offer the Company the ability to modify its procedures for notifying,
9 disconnecting, or reconnecting customers. In addition, these advancements have
10 provided its customers with additional payment methods.⁵
- 11 2. The changes will ensure its customers have a reasonable expectation of how they
12 can interact and correspond with the Company.
- 13 3. Since the Company has only made minimal changes to its R&R since 2007, some
14 practices have become outdated.
- 15 4. Revisions will enable the Company service to their customers in a manner more
16 consistent with updated practices.
- 17 5. The Company desires these modifications to better align its R&R with Pioneer
18 because both entities are governed and managed by the same board of trustees and
19 executives.⁶

4. Id, p. 7.

5. Id, p. 8.

6. Id, pages 8-9.

1 **Q. Has the Company summarized the revisions it has requested?**

2 A. Yes. In the direct testimony of Brian Beecher, Southern Pioneer's Operations and
3 Engineering Manager, he offers a summary table of the R&R changes sought by the
4 Company. Although it is not a complete table of all changes the Company seeks, it provides
5 the most substantive changes pertaining to this docket.⁷
6

7 **Q. Is CURB responding to each change in Mr. Beecher's testimony?**

8 A. No. CURB will specifically respond to the Company's policy changes highlighted
9 in Mr. Scott's testimony: 1) Security Deposits, 2) Credit Card payment policies, and 3)
10 Modifications to Knock and Collect. However, CURB's silence regarding one or more
11 changes is not indicative of its support or opposition to a change and reserves the right to
12 address and respond to new information regarding these proposed changes.
13

14 **Q. Please discuss the Company's proposed changes to security deposits.**

15 A. The Company requests that it be allowed to require a security deposit from non-
16 residential customers, including those customers in the Industrial and Sub-Transmission
17 ("STR") classes. The Company intends to request security deposits from all new non-
18 residential customers at the time of application for service. For existing customers, the
19 Company intends to require security deposits for large industrial customers taking service
20 under their Industrial or Sub-Transmission tariffs, as well as non-residential customers that

7. Direct Testimony of Brian Beecher on Behalf of Southern Pioneer Electric, dated March 14, 2025, p. 3.

1 it perceives to pose substantial risk of substantial harm or financial burden for the Company
2 and its other customers in the event of nonpayment.⁸ These customers generally include
3 businesses involved in oil and gas production, oil and gas equipment supply, agricultural
4 commodities, and other industries which can be substantially affected by market and
5 economic forces.⁹ The Company believes these accounts and customers pose a greater risk
6 of harm due to the disparate impacts of nonpayment by such customers on the system
7 compared to individual residential and smaller customers.

8 The Company states that requiring security deposits will benefit customers as a
9 whole by providing protection against conditions that could cause disruptions of payment
10 for services rendered. The Company, in certain instances, could be required to incur
11 additional debt or request that uncollected amounts be recovered from all classes of
12 customers in the event a large customer is unable to pay.

13
14 **Q. What is CURB's position regarding the proposed changes for security deposits?**

15 A. CURB recognizes that the Company operates on a minimal amount of cash flow
16 due to the Company's unique ratemaking and organizational structure. Non-payment of
17 large accounts could cause it to incur additional debt thereby causing an imbalance in its
18 Formula Based Rates ("FBR") and could impair the Company's financial viability. As a
19 result, the remaining customers could be exposed to additional expenses and issues simply

8. Direct Testimony of Chantry Scott, Executive VP-Chief Financial Officer, Docket No. 25-SPEE-353-TAR Southern Pioneer Electric Company, dated March 14, 2025, p. 11.

9. Id, p 11.

1 because a handful of large customers were no longer contributing to cost recovery. To the
2 degree that security deposits are collected from large commercial and industrial customers
3 who present elevated financial risks, CURB is supportive of the requirements and tariff
4 changes designed to effectuate the policy.

5 However, the Company's proposed modifications for when it can require new or
6 modified deposits may be overbroad and impact residential and small commercial
7 customers more than the status quo. For example, the Company proposes to require a
8 security deposit from customers who have previously filed or consented to a bankruptcy
9 petition under federal bankruptcy law or any other insolvency laws or regulations of any
10 state or other jurisdiction.¹⁰ The Company states that such a history demonstrates sufficient
11 financial risk to warrant a deposit requirement for service; however, CURB believes that
12 there should be a limit on how far back Southern Pioneer should be able to consider.
13 Although the Company highlights the risks associated with larger industrial customers, the
14 revisions presented in the Application appear to be general enough to apply to smaller
15 commercial customers and individuals responsible for payment on the account. Because a
16 bankruptcy will stay on a credit report for up to 10 years¹¹, CURB believes this is a
17 reasonable standard for the Company to consider a bankruptcy, especially for residential
18 and small commercial customers who pose much less harm to the system due to
19 nonpayment compared to larger customers.

10. Direct Testimony of Chantry Scott, Executive VP-Chief Financial Officer, Docket No. 25-SPEE-353-TAR Southern Pioneer Electric Company, dated March 14, 2025, p. 13.

11. <https://www.consumerfinance.gov/ask-cfpb/how-long-does-a-bankruptcy-appear-on-credit-reports-en-325/>.

1 Additionally, the Company proposes changes to when it may require deposits based
2 on nonpayment history. Currently, the tariff on page 2 of Schedule R&R Deposits in R3
3 allows the Company to charge a deposit if a customer experiences multiple nonpayment or
4 disconnection events within a twelve-month period.¹² The Company's modifications would
5 allow it to require a customer deposit even after just one disconnection or for three separate
6 late payments within a twelve-month period. Furthermore, Southern Pioneer has added a
7 catch-all provision on requiring a new or additional deposit on page 3 of Schedule R&R
8 Deposits in R3 that states "The Company establishes that the Customer is a financial risk
9 to the Company or cannot demonstrate adequate assurance of future payment." If applied
10 to residential and small commercial ratepayers, these changes give the Company the ability
11 to declare anyone who has even had momentarily extended difficulties in paying utility
12 bills a financial risk and require additional deposits.

13
14 **Q. What is your recommendation regarding the Company's proposed changes?**

15 **A.** I believe the Company should modify its tariffs in order to require security deposits
16 for large customers whose nonpayment would create a risk of substantial harm to the
17 Company's financial standing. However, to the degree that the modifications presented in
18 Mr. Beecher's testimony be interpreted to require new or additional security deposits for
19 residential and small commercial ratepayers, it should be specifically stated whether the
20 triggering criteria apply to residential or non-residential customers in order to avoid

12. Southern Pioneer Electric Company, Rules and Regulations 2021, Index No. R3B(5).

1 excessively enforcing deposit requirements for customers who are not a substantial risk to
2 the system for nonpayment. Further, the language should clearly define what metrics the
3 Company will consider regarding “financial risk” outside the other qualifying events in
4 that section. Should the Commission approve the Company’s proposed changes to its
5 policy concerning security deposits, CURB suggests the Company provide a more specific
6 definition of “financial risk.”
7

8 **Q. Please discuss the Company’s proposed changes to credit card payments.**

9 A. The Company allows customers to pay monthly utility bills either by mail, bank
10 withdrawal, in person, on-line, or by phone. Customers may make payments with cash,
11 check, money orders, e-Check, debit cards, and credit cards.¹³ In the current docket, the
12 Company proposes limiting credit card payment options to only residential customers and
13 those customers receiving single phase service.¹⁴

14 The Company noted in the 25-SPEE-307-MIS (“25-307 Docket”) that it requested
15 interim relief from excessive credit card transaction fees by requesting a partial waiver of
16 its R&R tariff to disallow payment by credit card from its STR class of customers. The
17 Company requested relief be granted on an expedited basis to avoid continuing accrual of
18 substantial credit card transaction fees while it sought a more permanent solution to this
19 issue.¹⁵

13. Southern Pioneer Electric Company, Rules and Regulations 2021, Index No. R4G(1-5).

14. Direct Testimony of Chantry Scott, Executive VP-Chief Financial Officer, Docket No. 25-SPEE-353-TAR Southern Pioneer Electric Company, dated March 14, 2025, p. 13.

15. Id, pages 6-7.

1 **Q. Has the Company attempted to modify its credit card procedures prior to the 25-353**
2 **Docket and the 25-307 Docket?**

3 A. Yes. In the 18-SPEE-241-TAR Docket ("18-241 Docket"), the Company sought a
4 waiver of minimum standards for payment methods of utility bills and allowing the
5 acceptance of credit cards and the approval of revisions to its schedule of fees related to
6 the assessment of credit card convenience fees. In the 18-241 Docket, the Company
7 requested approval to implement a payment option that would allow residential customers
8 to make payments using credit cards without incurring a \$3.95 fee for each transaction.
9 The Company stated it would pay the associated costs for credit card processing and these
10 costs would be recovered through base rates from all residential customers, not just those
11 utilizing credit cards.

12 On July 3, 2018, Staff issued their Report and Recommendation in the 18-241
13 Docket recommending the Commission grant the Company relief from its payment
14 standards that states customers not paying with credit cards shall not be burdened with the
15 transaction costs of customers utilizing these payment methods. Such a waiver is necessary
16 for Southern Pioneer to eliminate its credit card convenience fee and recover credit card
17 transaction costs through base rates from all customers and still follow the Commission's
18 rules and regulations.¹⁶ CURB filed its response on July 13, 2018, concluding Staff's
19 recommendations were reasonable. In its July 25, 2018, reply to both Southern Pioneer and

16. Notice of Filing of Staff's Report and Recommendation, Docket No. 18-SPEE-241-TAR, dated July 3, 2018 p. 2.

1 CURB, Staff raised concerns that Southern Pioneer had not demonstrated unknown costs
2 associated with extending the ability to pay by credit card to non-residential customers
3 would be unreasonably high. On August 30, 2018, the Commission adopted Staff's position
4 and authorized Southern Pioneer to (1) accept monthly bill payments by credit or debit
5 cards from all customer classes, (2) eliminate the \$3.95 convenience fee, and (3)
6 incorporate processing costs into its cost of service to be recovered through base rates.¹⁷
7

8 **Q. What information did the Company provide to support its request to modify credit**
9 **card payments in the present docket?**

10 A. The Company stated that its merchant fee invoices increased from a monthly
11 average of \$7,000 to \$34,000 in the months when the total amount paid by credit card
12 exceeded \$1,500,000. Mr. Scott notes that a number of large non-residential customers had
13 begun to pay bills by credit card, incurring significant transaction fees in 2024.¹⁸ The
14 Company does not believe it would be fair or reasonable to continue to allow such high-
15 fee transactions to accrue and require other customers to pay for such fees in the future
16 through base rates. The Company feels the best approach is to restrict credit card payments
17 to only those customers receiving single phase service.¹⁹

17. Order Approving Southern Pioneer's Revised Rules and Regulations, Docket No. 18-SPEE-241-TAR, dated December 4, 2018, pages 2-3.

18. Direct Testimony of Chantry Scott, Executive VP-Chief Financial Officer, Docket No. 25-SPEE-353-TAR Southern Pioneer Electric Company, dated March 14, 2025, p. 16.

19. Id. p. 11.

1 **Q. What is CURB's position regarding the change in credit card usage?**

2 A. The Company has shown how higher credit card transaction fees accumulate when
3 a large non-residential customer uses a credit card to pay their utility bills. In response to
4 CURB DR-5, the Company stated that customers can pay up to \$4,999.99 per transaction
5 and the fees are based on a percentage of the transaction amount. However, if the
6 customer's invoice is over this amount, then the customer would have to make multiple
7 payments per invoice. The Company recovers credit card fees as an operating expense
8 through its annual FBR filing.²⁰

9 CURB believes it is in the best interest of the residential and small commercial
10 businesses it represents to grant the Company's request and limit credit card payments to
11 residential and single-phase customers. It is highly unlikely such customers will have to
12 utilize multiple payments at the maximum limit, meaning that their contributions to credit
13 card fees assessed by the Company are relatively low. By requiring large customers to
14 utilize other payment methods, particularly direct withdrawal and other payment methods
15 without fees, this will reduce the amount the Company must socialize through recovery in
16 its annual FBR filings.

17 If the Commission rejects the proposed change to credit card usage, CURB
18 recommends that the Company explore alternative means to mitigate the amount of credit
19 card fees incurred by large non-residential customers, including seeking out credit card
20 transaction vendor contracts that allow for transaction fees to be paid directly by the

20. Southern Pioneer Response to CURB-5, dated June 5, 2025.

customer at the time of payment or allow for higher payment limits per transaction.

Q. Please discuss the Company's proposed changes to its Knock and Collect procedures.

A. The Company requests to remove section R5Ci(6) as it applies to non-AMI customers and R5Cii(9) as it applies to AMI customers. That language was adopted as part of Southern Pioneer's Pilot Program established under the Commission's "Knock-and Collect" procedures resulting from Docket No. 15-GIMX-344-GIV ("15-344 Docket"). The Company requests permission to instead notify customers of the intent to discontinue service by phone or as preferred by the customer, without prescribing any required contents of such notice.²¹

Q. What is CURB's position regarding the proposed changes to Section R5Ci(6) and Cii(9)?

A. CURB believes that reducing the amount of information provided to customers about their utility service should be more, not less, robust. These sections deal with notices of disconnections of utility service. Such an event can have significant consequences for the customer's life and create obstacles to reconnecting and maintaining service in the future. In response to CURB DR-4, the Company stated that it only serves one non-AMI customer meter. The customer in question is a residential customer in a rural location. The

21. Direct Testimony of Chantry Scott, Executive VP-Chief Financial Officer, Docket No. 25-SPEE-353-TAR Southern Pioneer Electric Company, dated March 14, 2025, pages 17-18.

1 Company has never had to disconnect that customer.²² CURB believes that if the Company
2 ever adds a new non-AMI customer, then they should receive the same information as an
3 AMI customer regarding non-payment and disconnection. Both groups of customers would
4 benefit from information about their account and any processes to avoid disconnection,
5 especially in the event of a dispute on the underlying facts. The Company's removal of this
6 requirement might serve administrative interests, but that should not supersede the value
7 of educating customers facing disconnection. Furthermore, Staff objected to the removal
8 of Section R5Ci(6) from the Company's tariffs because it would no longer conform to the
9 Billing Standards, and because customers reading through the tariffs should be able to
10 clearly understand what information they can expect to see on a disconnection notice.²³
11 CURB agrees with Staff and is opposed to this change and recommends the Commission
12 deny the Company's request.

13
14 **Q. Does CURB have concerns with the Company's proposed changes to the frequency**
15 **at which the Company provides notice of disconnection as it relates to AMI**
16 **customers?**

17 **A.** Yes. The Company proposes to align its practices concerning disconnection notices
18 with that of Pioneer. The Company desires to eliminate contact at the 5–7 day point and 1
19 day contact point and only contact customers at the 10 day and 2 day point informing them

22. Southern Pioneer Response to CURB-4, dated April 30, 2025.

23. Direct Testimony of Douglas Hall on Behalf of KCC Staff, Dated June 24, 2025, p. 12.

1 of an impending disconnection. The Company states these changes are necessary to
2 modernize and streamline the process of communication in this area.²⁴

3 In the 15-344 Docket, the Commission granted Southern Pioneer permanent
4 waivers of the Knock and Collect requirements of the Commission Billing Standards. This
5 waiver pertained only to those customers served by AMI meters that have remote
6 disconnection capabilities.²⁵ The Order required utilities to make additional attempts to
7 contact the customer prior to disconnection and relieved the utility from making an on-
8 premises collection except during the Cold Weather Rule months.

9 From the 15-344 Docket, for customers with AMI meters during non-cold weather
10 months (April 1 through October 31), the utility must mail a "Notice of Disconnection" to
11 the customer separately from a utility bill or other correspondence to non-payment
12 customers 10 days prior to a disconnection date. Another attempt would be made by the
13 utility to contact these customers via their preferred contact choice from 5-7 days prior to
14 disconnection, then at 2 days prior to disconnection, and one day prior to disconnection.
15 On the day of disconnection, the utility may disconnect the customer. The utility is not
16 required to make an on-premises collection attempt.

17 During Cold Weather Months (November 1 through March 31), the same standards
18 apply except the utility would contact the customer via a phone call the day prior to
19 disconnection, informing them of their intent to disconnect. If the attempted phone contact

23. Direct Testimony of Chantry Scott, Executive VP-Chief Financial Officer, Docket No. 25-SPEE-353-TAR
Southern Pioneer Electric Company, dated March 14, 2025, p.18.

25. Order on Knock and Collect Pilot Program, Docket No. 15-TIMX-344-GIV, dated February 4, 2021, p. 15.

1 is unsuccessful, the utility may then disconnect service on the day of disconnection.²⁶

2 CURB recommends the Commission deny the Company's request to modify the
3 contact schedule for AMI customers. The prevailing consideration from the 15-344 Docket
4 regarding the waiver of Knock and Collect provisions was that there should be additional
5 contact points with the customer prior to disconnection to make up for the lost opportunity
6 to do so in person. It benefits the Company and other customers to offer those who are in
7 payment arrears opportunities to make payment on their account and avoid disconnections.
8 While administrative uniformity is a valid goal for utility operations across related entities,
9 it does not outweigh the importance of providing opportunities for customers to avoid
10 disconnections. CURB does not believe that removing additional communication
11 requirements with customers achieves any significant cost savings and unnecessarily
12 increases the risk that a customer fails to respond to notices of disconnection. Furthermore,
13 should the Commission grant the Company's request to modify its procedures concerning
14 contact points with its customers, CURB has concerns this will set a precedent for other
15 utilities to follow.

16
17 **Q. What is your final recommendation?**

18 A. CURB recommends the Commission approve the Company's request to modify its
19 procedures requiring security deposits for Industrial customers and Sub-Transmission
20 customers. In addition, CURB recommends the Commission approve limiting payment by

26. Id, pages 3-4.

1 credit cards to only residential customers and those customers receiving single phase
2 service. Disallowing payment by credit card from its STR customers, in particular, should
3 help the Company mitigate incurring significant transaction fees. These charges are
4 currently socialized across all customers and recovered through the Company's FBR.
5 CURB recommends the Commission deny the Company's request to modify its Knock and
6 Collect standards governing disconnection notice content of AMI and non-AMI customers.
7 CURB recommends the Commission deny the Company's request to modify its Knock and
8 Collect standards for AMI customers by removing the Company contacting customers
9 whose accounts are in arrears at the 5-7 day range and at 1 day prior to disconnection.
10 Customers whose accounts are in arrears should have every opportunity to bring their
11 accounts current and more points of contact better serves that purpose compared to fewer.


12
13 **Q. Does this conclude your testimony?**

14 **A.** Yes, it does.

VERIFICATION

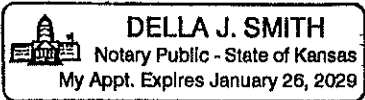
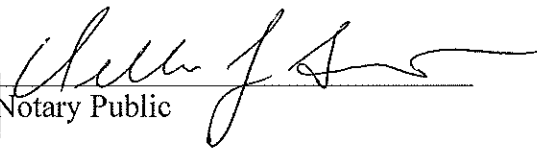
STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

I, Patrick Orr, of lawful age and being first duly sworn upon my oath, state that I am a Regulatory Analyst for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.



Patrick Orr

SUBSCRIBED AND SWORN to before me this 26th day of June, 2025.

 
Notary Public

My Commission expires: 01-26-2029.

CERTIFICATE OF SERVICE

25-SPEE-353-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 27th day of June, 2025, to the following:

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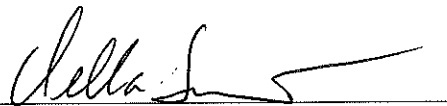
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