



March 21, 2023

To: Senate Committee on Utilities
From: Patrick Vogelsberg - Manager of Government Affairs, Kansas Gas Service
Re: SB 278, Opponent -Written-only testimony

Chairman Olson and members of the Senate Committee on Utilities:

Thank you for the opportunity to provide written testimony in opposition to SB 278 on behalf of Kansas Gas Service, which is a division of ONE Gas, Inc. Kansas Gas Service is the state's largest, 100% regulated natural gas utility. We are proud to serve more than 647,000 customers across 360 Kansas communities.

Kansas Gas Service has concerns with the contents of SB 278. As a 100% regulated utility, we have regular reporting requirements to the Kansas Corporation Commission and to other state and federal agencies that oversee our operations. SB 278's data reporting requirements appear to be excessive and go well beyond what is traditionally required of public utilities. The monthly regulatory burden and cost of compliance increase with this legislation is hard to quantify. These increased compliance costs would ultimately increase Kansas Gas Service's cost to serve our customers – costs our customers ultimately bear.

The bill also requires significant public disclosure of customer information *monthly*. Notable, the public disclosure would be required to be released by customer income level. We do not require our customers to provide us with their income level as a requirement for service, let alone, monthly updates.

Furthermore, the public release would be organized by customer class and census tract. To illustrate a concern, some census tracts may only have one industrial user making it easy to identify a specific company. This could result in publicly disclosing billing information of a specific company – dollar amount, usage, arrearages, collection activities, etc. This is information we otherwise keep confidential. This leads us to a general concern of how this customer information will be exploited by third parties.

It appears the general intent of SB 278 is an effort to understand the financial burden of energy costs in Kansas. Before seriously considering SB 278, we would recommend exploring other, less burdensome methods. For example, the U.S. Department of Energy provides a "Low-Income Energy Affordability Data (LEAD) Tool on its website.¹

Kansas Gas Service respectfully requests that the Senate Utilities Committee reject SB 278. Thank you for your consideration of our testimony.

Sincerely,


Patrick Vogelsberg
Manager of Government Affairs
Kansas Gas Service

¹ <https://www.energy.gov/scep/slsc/low-income-energy-affordability-data-lead-tool>