



Douglas J. Law
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December 3, 2024

Lynn M. Retz
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604

RE: Docket No. 25-EKCE-207-PRE

Dear Ms. Retz:

Enclosed for filing is the Petition to Intervene of Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills Energy in Docket No. 25-EKCE-207-PRE.

Respectfully submitted,

/s/ Douglas J. Law

Douglas J. Law
Associate General Counsel

DL:ce

cc: Service List
Nick Smith
Rami Alnajjar

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Petition of Evergy)	Docket No. 25-EKCE-207-PRE
Kansas Central, Inc., Evergy Kansas South,)	
Inc., and Evergy Metro, Inc. for)	
Determination of the Ratemaking)	
Principles and Treatment that Will Apply to)	
the Recovery in Rates of the Cost to be)	
Incurred for Certain Electric Generation)	
Facilities under K.S.A. 66-1239)	

PETITION TO INTERVENE OF

BLACK HILLS/KANSAS GAS UTILITY COMPANY, LLC

Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills Energy (“Black Hills”) hereby petitions the State Corporation Commission of the State of Kansas (“Commission”) for an Order allowing it to intervene herein pursuant K.S.A. 77-521 and K.A.R. 82-1-225. In support of Petition, Black Hills states as follows:

1. Black Hills is a limited liability company with its principal place of business in the state of Kansas at 601 N. Iowa Street, Lawrence, Kansas 66044. Black Hills is duly authorized to transact business in the state of Kansas, holds appropriate certificates from this Commission to transact business as a natural gas public utility and is now and has been engaged in the purchase, transmission, sale and distribution of natural gas in the state of Kansas in accordance with the laws of said state and the rules and regulations of this Commission.

2. Black Hills serves approximately 119,000 customers in 66 communities and in 50 surrounding counties in Kansas. Operation centers are located in the major cities and towns served by Black Hills which include Lawrence, Wichita, Garden City, Dodge City, Liberal, and Goodland. Black Hills currently operates 339 miles of transmission lines, 3,026 miles of distribution lines, and 105,590 service lines in Kansas.

3. On November 6, 2024, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (collectively, “EKC”) and Evergy Metro, Inc., d/b/a Evergy Kansas Metro (“EKM”) (EKC and EKM referred to herein together as “Evergy”), filed a Petition for Determination of Ratemaking Principles and Treatment with the Commission with respect to its plan to build, among other electric generation facilities, two (2) natural gas combined-cycle electric generation facilities to be located in Reno and Sumner Counties in Kansas. Evergy plans to connect the two facilities to existing interstate and intrastate pipelines located nearby the facilities and use those pipelines to transport the natural gas that will be used to fuel the two facilities. Black Hills currently contracts with some of those pipelines to transport natural gas for its retail natural gas sales customers in Kansas and wants to make sure that Evergy’s plans do not negatively interfere with Black Hills’s ability to continue to provide reliable and reasonable cost natural gas supplies to its Kansas customers.

4. Black Hills is requesting permission to intervene herein to represent its interest and the interests of its customers in Kansas. Specifically, Black Hills is concerned with what impact approval of Evergy’s application and Evergy’s fuel supply plans, as set forth in the testimony that accompanied the application, will have on Black Hills’ ability to continue to obtain reliable and reasonable cost natural gas supplies for its natural gas customers in Kansas.

5. Black Hills’ interests and the interests of its Kansas customers are not adequately represented by the existing parties in this docket.

6. Granting intervention and party status to Black Hills will not impede the progress of this docket.

7. All communications and correspondence to Black Hills, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

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Kent Kopetzky
Sr. Gas Buyer
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Council Bluffs, IA 51503
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WHEREFORE, Black Hills prays the Commission enter an Order permitting its intervention herein and for such other relief as the Commission may deem just and proper.

Dated: December 3, 2024

Respectfully submitted,

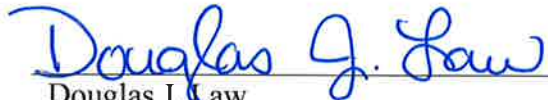


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VERIFICATION

STATE OF NEBRASKA)
) ss:
COUNTY OF LANCASTER)

Douglas J. Law, being duly sworn upon her oath, deposes and states that he is an attorney for Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy; that he has read and is familiar with the foregoing Petition to Intervene; knows the contents thereof; and that the statements contained therein are true to the best of his information, understanding, and belief.



Douglas J. Law

SUBSCRIBED AND SWORN to before me this 3rd day of December 2024.



Notary Public

Commission/Appointment Expires:



CERTIFICATE OF SERVICE

25-EKCE-207-PRE

I, the undersigned certify that a true and correct copy of the foregoing was served via electronic service this 3rd day of December, 2024 to the following:

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/s/ *Douglas J. Law*