

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

In The Matter of The Application of Kansas Gas)
Service, a Division of ONE Gas, Inc. For)
Approval of Revisions to Certain Tariffs) Docket No. 23-KGSG-719-TAR
Controlling Transportation Service.)

PETITION TO INTERVENE

COMES NOW WoodRiver Energy, LLC (“WoodRiver”) and petitions the Corporation Commission of the State of Kansas (“Commission”) for intervention in the above-captioned case pursuant to K.S.A. 77-521. In support of its petition, WoodRiver states and alleges as follows:

1. On March 31, 2023, Kansas Gas Service, a Division of ONE Gas, Inc. ("KGS") filed an application with the Kansas Corporation Commission to revise certain tariffs controlling Transportation Service provided by KGS.

2. WoodRiver is a privately-owned natural gas marketing company providing reliable natural gas service to agricultural, commercial, and industrial natural gas customers throughout Kansas and to neighboring states. WoodRiver has a significant customer base in Kansas served off the KGS jurisdictional gas utility system.

3. As a supplier on KGS, WoodRiver anticipates that as a result of this proceeding its’ customers may experience changes to the terms of service under which WoodRiver serves those customers which may be detrimental to them. To the extent terms may change as a part of this proceeding, WoodRiver and its’ customers have an immediate interest.

4. WoodRiver’s interest in this proceeding is not adequately represented by any other party.

5. WoodRiver will accept the record and all orders entered in this proceeding to date.

6. As of the writing of this Petition to Intervene no procedural schedule has yet been set in this matter. Therefore, the intervention will not disrupt or impair the orderly and prompt conduct of the proceedings. However, if a procedural schedule is set between the time of this writing and the acceptance of this Petition to Intervene for filing, Woodriver states that it will accept the Procedural Schedule as set.

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

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* Mr. Goldberg is listed as counsel subject to Commission action on his Motion for Admission Pro Hac Vice, which is being filed simultaneously herewith.

WHEREFORE, WoodRiver respectfully requests the Commission enter an Order allowing it to intervene in this proceeding and for all other relief which the Commission deems just and proper.

By: /s/ Jeffrey S. Austin
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Counsel to WoodRiver


Executed on April 12, 2023.

* Mr. Goldberg is listed as counsel subject to Commission action on his Motion for Admission Pro Hac Vice, which is being filed simultaneously herewith.

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

I, Jeff Austin, of lawful age and being first duly sworn upon my oath, state that I am an attorney for WoodRiver Energy, LLC; 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 under the pains and penalties of perjury.



Jeffrey S, Austin, KS Sup

Ct # 13575

Executed on April 12, 2023.

Subscribed and sworn to before me, a Notary Public, this 12th day of April, 2023.



Notary

My commission expires: 6.14.23

LIEF INGERSOLL
Notary Public-State of Kansas
My Appt. Expires 6.14.23

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 12th day of April, 2023, addressed to:

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