

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 an Accounting Order to Track Expenses )  
Associated with the Investigating, Testing, ) Docket No. 17-KGSG-455-ACT  
Monitoring, Remediating and Other Work )  
Performed at the Manufactured Gas Plant Sites )  
Managed by Kansas Gas Service. )

**JOINT MOTION FOR PROCEDURAL SCHEDULE**

Kansas Gas Service, a division of ONE Gas, Inc. ("Kansas Gas Service" or "Company") (ONE Gas Inc., is referred to herein as "ONE Gas"), the Staff of the Kansas Corporation Commission ("Staff") and the Citizens' Utility Ratepayers Board ("CURB") (collectively "Parties") request the Kansas Corporation Commission ("Commission") grant this joint motion for procedural schedule ("Motion"). In support of the Motion, the Parties state as follows:

I. **BACKGROUND**

1. On April 11, 2017, Kansas Gas Service filed an application ("Application") requesting an accounting order from the Commission authorizing the accumulation, deferral and recovery of costs incurred after January 1, 2017, associated with the Company's obligation to perform environmental investigating, testing, monitoring, remediating and other work on specific natural gas facilities (used in the past to manufacture gas) and the real property where those facilities were located, as well as nearby properties, which are being managed by the Company ("Environmental Work"). Kansas Gas Service is also seeking approval on how any insurance proceeds should be accounted for by the Company.

6. On April 12, 2017, CURB filed a petition to intervene in this matter and was granted intervention on April 20, 2017.

II. REQUEST FOR PROCEDURAL SCHEDULE

7. The proposed procedural schedule set forth herein, although submitted as one combined schedule, contemplates two possible tracks.<sup>1</sup> The Parties request the Commission issue an order approving a schedule including both alternative tracks. The first track includes a technical conference to be held by Kansas Gas Service, Staff, and any intervenors to the case. The parties will informally schedule the technical conference. If the technical conference and first track process results in general agreement among the Parties, then Kansas Gas Service, Staff, and intervenors would proceed under Track One as follows:

**Track One:**

Technical Conference	Parties will schedule informally
Staff R&R	Wednesday, August 9, 2017, 5:00p.m.
Response to Staff's R&R	Wednesday, August 16, 2017, 5:00 p.m.
Settlement Conference (if necessary)	Thursday, August 17, 2017, 9:00 a.m.
Settlement and Proposed Order to be Prepared by the Parties	Thursday, August 24, 2017, 5:00 p.m.
Prehearing Conference (if necessary)	Thursday, August 24, 2017, 2:00 p.m.
Hearing (if necessary)	Thursday, August 31, 2017, 9:00 am
Commission Order	Monday, October 2, 2017

8. If neither Staff nor any intervenor develops material opposition to the Joint Application, Staff will file an R&R, and the Docket will proceed under the first track schedule as set forth in paragraph 7 above. Staff will only follow the first track if all of the parties to this proceeding are in general agreement before the R&R deadline. If the Commission believes that a

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<sup>1</sup>A similar two-track schedule has been approved and used by the Commission recently in Docket No. 14-PGSG-100-MIS and Docket No. 16-ITCE-512-ACQ.

hearing on the settlement resulting under the first track schedule is necessary, all witnesses who pre-filed testimony in this matter, and a designated witness for the Staff and any intervenor would be made available at the hearing on the settlement to answer any questions from the Commission. If the Commission determines that no hearing is necessary, then the scheduled hearing under the first track would be cancelled and the Commission would issue its order on or before October 2, 2017.

9. If Kansas Gas Service, Staff, and the intervenors are unable to reach agreement under the Track One schedule, the Parties will proceed by following Track Two of the procedural schedule, as set forth below. Once Staff determines which track it will proceed under, it shall advise the Prehearing Officer, Kansas Gas Service, and all intervenors promptly. Track Two shall include the following procedural timeline:

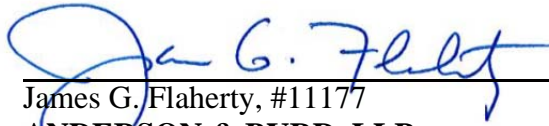
**Track Two:**

Staff and Intervenor Testimony	Friday, September 8, 2017, 5:00 p.m.
Staff and Intervenor Cross Testimony	Monday, September 18, 2017, 5:00 p.m.
Kansas Gas Service Rebuttal Testimony	Monday, September 25, 2017, 5:00 p.m.
Settlement Conference	Thursday, September 28, 2017, 5:00 p.m.
Settlement Agreement and Testimony in Support of Settlement Agreement	Thursday, October 5, 2017, 5:00 p.m.
Prehearing Conference/List of Contested Issues	Tuesday, October 10, 2017, 9:00 am
Hearing	Wednesday-Thursday, October 18-19, 2017, 9:00 a.m.
Simultaneous Briefs	Friday, November 10, 2017, 5:00 p.m.
Commission Order Due	Tuesday, December 12, 2017

WHEREFORE, Kansas Gas Service, Staff and CURB request the Commission issue an

Order approving the proposed two-track procedural schedule set forth herein.

Respectfully submitted



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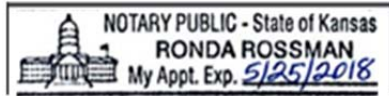
**VERIFICATION**

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF FRANKLIN    )

The undersigned, upon oath first duly sworn, states that he is the attorney for Kansas Gas Service, a Division of ONE Gas, Inc., that he has read the foregoing Motion for Procedural Schedule, that he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.

  
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James G. Flaherty

Subscribed and sworn to before me this 21<sup>st</sup> day of April, 2017.



  
\_\_\_\_\_  
Notary Public

Appointment/Commission Expires:

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via U.S. Mail, postage prepaid, hand-delivery, or electronically, this 21<sup>st</sup> day of April, 2017, addressed to:

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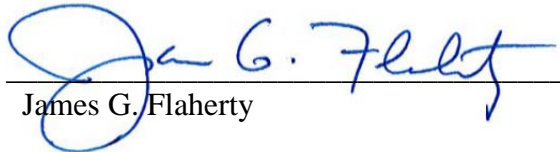
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