

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of Mid)
Continent Market Center, LLC for Permission)
to Cease Operating an Approximately)
Eighteen-Mile Twelve-Inch Natural Gas)
Pipeline Located in Kingman County, Kansas)
and of Kansas Gas Service, A Division of ONE)
Gas, Inc. for Permission to Cease Providing)
Service to Five Farm Tap Customers Served)
from this Natural Gas Pipeline.)

Docket No. 23-MCIG-888-CCS

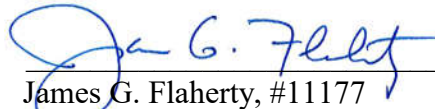
RESPONSE TO STAFF'S REPORT AND RECOMMENDATION

Mid Continent Market Center, LLC ("MCMC") and Kansas Gas Service, a Division of ONE Gas, Inc. ("KGS") provide the following response to the Staff of the Kansas Corporation Commission ("Staff") Report and Recommendation filed on November 14, 2023 ("R&R") in the above-captioned matter.

1. On November 14, 2023, Staff filed its R&R recommending the following:
 - (1) The Commission approve MCMC's request to cease operation of the 18.4 mile pipeline;
 - (2) The Commission approve KGS's request to abandon service to the five farm tap customers;
 - (3) The Commission order KGS cover the cost to purchase a full propane tank, purchase a hot water tank, line from the tank, three appliance conversions, and cover the income tax costs; and
 - (4) The Commission order KGS to reimburse the customers for costs exceeding the estimate regardless if an agreement was signed.

2. MCMC and KGS have reviewed the Staff's R&R and concur with the recommendations made.

WHEREFORE, MCMC and KGS request the Commission issue an order approving the recommendations made by Staff in its R&R.



James G. Flaherty, #11177
ANDERSON & BYRD, LLP
216 S. Hickory ~ P.O. Box 17
Ottawa, Kansas 66067
(785) 242-1234, telephone
(785) 242-1279, facsimile
jflaherty@andersonbyrd.com
Attorneys for Mid Continent Market Center, LLC



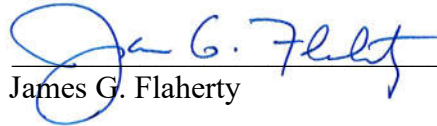
Robert Elliott Vincent, #26028
KANSAS GAS SERVICE
7421 West 129th Street
Overland Park, Kansas 66213-2634
(913) 319-8615, telephone
(913) 319-8622, facsimile
robert.vincent@onegas.com
Attorney for Kansas Gas Service,
a Division of ONE Gas, Inc.

VERIFICATION

STATE OF KANSAS
COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states:

That he is the attorney for Mid Continent Marketing, Inc., named in the foregoing Response to Staff's Report and Recommendation and is duly authorized to make this affidavit; that he has read the foregoing and knows the contents thereof; and that the facts set forth therein are true and correct.


James G. Flaherty

SUBSCRIBED AND SWORN to before me this 27th day of November, 2023.



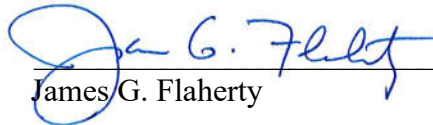


Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 27th day of November, 2023, addressed to: Brett W. Berry, b.berry@kcc.ks.gov.


James G. Flaherty