

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.'s)
Submission of its Insurance Policy Agreements)
with Utility Insurance Company, Pursuant to)
K.S.A. 66-1402.)

Docket No. 24-KGSG- 460 -CON

APPLICATION

Kansas Gas Service, a Division of ONE Gas, Inc. ("Kansas Gas Service" and "ONE Gas," respectively), pursuant to K.S.A. 66-1402, submits to the Kansas Corporation Commission ("Commission" or "KCC"), its Insurance Policy Agreements with Utility Insurance Company ("UIC"), an affiliated company of Kansas Gas Service.

In support of its Application, Kansas Gas Service submits the following to the Commission:

A. NOTICES AND COMMUNICATIONS

1. The names, addresses, phone numbers and electronic mailing addresses of the persons authorized to receive notices and communications with respect to this Application on behalf of Kansas Gas Service are as follows:

James G. Flaherty
Anderson & Byrd, LLP
216 S. Hickory ~ P.O. Box 17
Ottawa, Kansas 66067
jflaherty@andersonbyrd.com
(785) 242-1234

Robert E. Vincent, Managing Attorney
Kansas Gas Service, a Division of ONE Gas, Inc.
7421 W. 129th Street
Overland Park, Kansas 66213
robert.vincent@onegas.com
(913) 319-8615

Janet Buchanan, Director, Rates and Regulatory
Kansas Gas Service, a Division of ONE Gas, Inc.
7421 W. 129th Street
Overland Park, Kansas 66213
janet.buchanan@onegas.com
(913) 319-8615

B. DESCRIPTION OF THE PARTIES

2. Kansas Gas Service is a natural gas public utility operating in the State of Kansas pursuant to certificates of convenience and necessity issued by the Commission. Kansas Gas Service's principal place of business in the State of Kansas is located at 7421 W. 129th Street, Overland Park, Kansas 66213. Kansas Gas Service is a natural gas utility company within the meaning of K.S.A. 66-1,200 of the Kansas Public Utility Act and is engaged in the business of selling and distributing natural gas in various communities located throughout the State of Kansas. Kansas Gas Service is a Division of ONE Gas.

3. ONE Gas is an Oklahoma corporation and a 100% regulated natural gas distribution utility. ONE Gas is the largest natural gas distribution company in Oklahoma and Kansas and the third largest in Texas.

4. UIC is wholly owned by ONE Gas. UIC has been formed to provide ONE Gas' distribution companies, Kansas Gas Service, Oklahoma Natural Gas and Texas Gas Service, insurance coverage as described below. UIC's principal place of business is 15 East Fifth Street, Tulsa, Oklahoma 74103. UIC is regulated by the Oklahoma Insurance Department.

C. INSURANCE POLICY AGREEMENTS

5. In order for Kansas Gas Service to better control the cost of insurance, UIC will provide insurance coverage to Kansas Gas Service pursuant to the Insurance Policy Agreements

attached to this Application. Specifically, under the Insurance Policy Agreements, UIC will provide the following insurance coverage to Kansas Gas Service:

- a. auto liability claims (Exhibit A);
- b. general and excess liability (Exhibit B);
- c. worker's compensation and employer's liability claims (Exhibit C);

(collectively referred to herein as "Insurance Policy Agreements").¹

6. UIC's insurance coverage will cover all claims greater than \$100,000.00. UIC will purchase re-insurance for claims greater than \$2 million, which is the same insurance plan currently held by ONE Gas for Kansas Gas Service.

7. The premiums charged by UIC were designed by an external actuary utilizing 20 years of actual claims history and approved by the Oklahoma Insurance Department. UIC will be audited annually by an outside audit firm.

8. The primary benefit from purchasing insurance coverage from UIC will be a reduction in the deductible per incident to \$100,000.00 from \$2 million. In addition, the premium paid to UIC in excess of claims paid out in a given year will be placed into a reserve for future years and will not be considered income to UIC. Finally, the use of a wholly-owned, or what is referred to in the industry as a "captive insurance company," has been successfully utilized by other regulated utilities such as Westar n/k/a Evergy, Atmos Energy, and American Electric Power and will provide ONE Gas and Kansas Gas Service flexibility in different market conditions by providing them direct access to

¹See Docket No. 18-KGSG-392-CON, Report and Recommendation from KCC Utilities Division filed August 31, 2018, for background and summary information as to ONE Gas' creation of UIC to provide its distribution companies with insurance coverage for claims greater than \$250,000 and less than \$2 million and the cost benefits the contract provides to the customers of its distribution companies.

reinsurance markets.

D. SUBMISSION OF THE INSURANCE POLICY AGREEMENTS TO THE COMMISSION

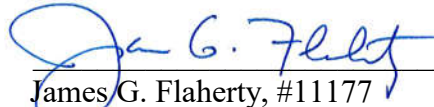
9. The purpose of the Insurance Policy Agreements is to provide formal agreements where UIC will provide insurance coverage to Kansas Gas Service and the other natural gas distribution company divisions of ONE Gas. The Insurance Policy Agreements attached to this Application and incorporated herein by reference are being submitted to this Commission under K.S.A. 66-1402. This section provides:

66-1402. Submission of contracts with affiliated interests to commission. No management, construction, engineering or similar contract, hereafter made, with any affiliated interest, as defined in K.S.A. 66-1401 and amendments thereto, shall be effective unless it shall first have been filed with the Commission. If it be found that any such contract is not in the public interest, the Commission, after investigation and a hearing in accordance with the provision of the Kansas Administrative Procedure Act, is hereby authorized to disapprove such contract.

10. This arrangement will not result in increased risks or burdens to Kansas customers and will provide for more efficient use of resources. Further, the Insurance Policy Agreements will have no detrimental impact of Kansas Gas Service's ability to provide safe and reliable service to its customers. This arrangement will continue to enhance Kansas Gas Service's existing insurance coverage by providing it with increased flexibility and should result in benefits from the lower deductible UIC will provide to Kansas Gas Service under the Insurance Policy Agreements.

11. Kansas Gas Service has designated the attached Insurance Policy Agreements as confidential pursuant to K.S.A. 66-1220a and K.A.R. 82-1-221a. The Insurance Policy Agreements contain non-public, proprietary information that if released to the public could harm Kansas Gas Service.

WHEREFORE, Kansas Gas Service submits its Insurance Policy Agreements with UIC to the Commission pursuant to K.S.A. 66-1402.



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

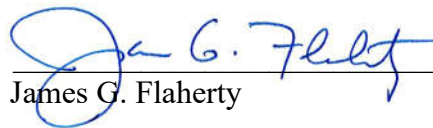
Robert E. Vincent, #26028
7421 West 129th Street
Overland Park, Kansas 66213
(913) 319-8615, telephone
(913) 319-8622, facsimile
robert.vincent@onegas.com

Attorneys 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 Kansas Gas Service, A Division of ONE Gas, Inc.; that he has read the foregoing Application, and the statements contained therein are true.



James G. Flaherty

SUBSCRIBED AND SWORN to before me this 21st day of December, 2023.



Notary Public

Appointment/Commission Expires:

EXHIBIT A

CONFIDENTIAL

EXHIBIT B

CONFIDENTIAL

EXHIBIT C

CONFIDENTIAL