202401091342276358 Filed Date: 01/09/2024 State Corporation Commission of Kansas

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

RE: Petition to Intervene

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Docket: No. 24-KGSG-284-ACQ

In the Matter of the Joint Application of American Energies Gas Service, LLC/American Energies Pipeline, LLC and Kansas Gas Service, a Division of ONE Gas, Inc. for an Order Approving the Transfer to Kansas Gas Service Certificates of Convenience and Necessity with Respect to AEGS's Natural Gas Utility Business and AEPL's Pipeline Facilities Located in Harvey, Marion, and McPherson Counties, Kansas to Provide Utility Service and for Other Related Relief.

Christy V. Londerholm, pro se, hereby moves the Commission to issue an Order allowing Christy V. Londerholm to intervene in this proceeding. In support of her petition, Christy V. Londerholm states:

- On September 22, 2023 American Energies Gas Service, LLC/American Energies
 Pipeline, LLC and Kansas Gas Service, a Division of ONE Gas, Inc filed for an
 approval to transfer Certificates of Convenience and Necessity with Respect to
 AEGS's Natural Gas Utility Business and AEPL's Pipeline Facilities Located in
 Harvey, Marion, and McPherson Counties, Kansas to Kansas Gas Service.
- Christy V. Londerholm is a member of the Pinebrooke Condominium Subdivision
 Association ("Pinebrooke"), Inc., a Kansas Corporation.
- Christy V. Londerholm obtains her gas service through Kansas Gas Service and monthly payments are made through the account of Pinebrooke after dues are paid by Christy V. Londerholm.
- The Joint Application requests for an Order "v. authorizing Kansas Gas Service to exempt
 AEGS's customers from Kansas Gas Service's Winter Event Securitized Cost Recovery
 Rider, and instead authorize Kansas Gas Service to assume and continue the remainder of
 AEGS's 2021 Winter Weather Event Rider;"
- In explanation of the Order request to exempt AEGS from the Winter Event Securitized Cost
 Recovery Rider, the Application states at Paragraph 15 "Instead of AEGS's customers being
 charged Kansas Gas Service's Winter Event Securitized Cost Recovery Rider ("WESCR"),
 former AEGS customers will continue to pay the AEGS 2021 Winter Weather Event Rider

- ("WWER"). Pursuant to the Financing Order issued by the Commission in Docket No. 21-KGSG-332-GIG, Kansas Gas Service elects to exclude the service territory acquired pursuant to this transaction from Kansas Gas Service's WESCR charges"
- Christy V. Londerholm met with Kansas Gas Service Representatives on February 1, 2023 in representation of the members of Pinebrooke whose dues had increased to incorporate WESCR charges.
- Christy V. Londerholm explained that Pinebrooke had already paid for Winter Storm Uri
 expenses to Symmetry, a third party provider, who actually provided gas to Pinebrooke
 during the storm. Pinebrooke did not cause KGS any increased gas cost during the storm.
- Christy V. Londerholm requested Pinebrooke be exempt from paying KGS as this was duplicative for the same winter event.
- Kansas Gas Service refused to exempt Pinebrooke from the duplicative charges.
- Christy V. Londerholm asserts the WESCR situation that the current acquisition Application
 before the Kansas Corporation Commission wherein the joint applications ask for an Order to
 exempt AEGS customers is the same situation that Kansas Gas Service refused to exempt
 for Pinebrooke.
- Christy V. Londerholm is directly impacted by any Order the Kansas Corporation
 Commission writes that allows for exemption of the WESCR when Kansas Gas Service has rejected such exemption to Pinebrooke. K.A.R. 82-I-225(a)(2
- Further, Christy V. Londerholm's legal interests are not adequately represented by any existing party.
- Christy V. Londerholm's requested intervention is in the interest of justice and will not impair the orderly prompt conduct of this proceeding.

Wherefore, Christy V. Londerholm, pro se, respectfully requests the Commission grant her petition to intervene.

Copies of all pleadings, notices, orders and other documents should be mailed to the following:

Christy V. Londerholm 10227 Lowell Avenue Overland Park, Kansas 66212 Email: cvlonderholm@gmail.com 913-908-3327

Christy V. Londekor

Respectfully submitted,

Christy V. Londerholm

CERTIFICATE OF SERVICE

24-KGSG-284-ACQ

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 28th day of December 2023, to the following:

KENNETH R. SMITH, EXECUTIVE VP AMERICAN ENERGIES GAS SERVICE, LLC 1020 EAST LEVEE ST SUITE 130 DALLAS, TX 75207 ksmith@trekresources.com

JAMES G. FLAHERTY, ATTORNEY ANDERSON & BYRD, L.L.P. 216 S HICKORY PO BOX 17 OTTAW A, KS 66067 jflaherty@andersonbyrd.com

CARLY MASENTHIN, LITIGATION
COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD TOPEKA, KS
66604

Christy V. Rome

c.masenthin@kcc.ks.gov

JANET BUCHANAN, DIRECTOR-REGULATORY AFFAIRS/ OKE 13165 KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.

ROBERT E. VINCENT, MANAGING ATTORNEY KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC. 7421 W. 129TH STREET OVERLAND PARK, KS 66213 robert.vincent@onegas.com

Shonda Rabb
Public Service Administrator
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road Topeka, KS
66604
s.rabb@curb.kansas.gov

Della Smith
Senior Administrative Specialist
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road Topeka, KS
66604
d.smith@curb.kansas.gov

Christy V. Londerholm