

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

Before Commissioners: Andrew J. French, Chairperson
 Dwight D. Keen
 Susan K. Duffy

In the Matter of the Investigation into Kansas)
Gas Service Company, a Division of One Gas)
Inc., Regarding the February 2021 Winter) Docket No. 21-KGSG-332-GIG
Weather Events, as Contemplated by Docket)
No. 21-GIMX-303-MIS.)

**ORDER GRANTING IN PART, DENYING IN PART NGTCC'S PETITION FOR
RECONSIDERATION OF ITS MOTIONS TO REMOVE CONFIDENTIAL
DESIGNATIONS FOR CERTAIN DOCUMENTS**

This matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed the pleadings and record, the Commission makes the following findings:

1. On February 15, 2021, pursuant to K.S.A. 77-536(a), the Commission issued an Emergency Order in Docket No. 21-GIMX-303-MIS (Docket 21-303), directing all jurisdictional natural gas and electric utilities to coordinate efforts and take all reasonably feasible, lawful, and appropriate actions to ensure adequate transportation of natural gas and electricity to interconnected, non-jurisdictional Kansas utilities.¹ Jurisdictional natural gas utilities were ordered to do everything necessary to ensure natural gas service continued to be provided to their customers in Kansas.² The Commission authorized every jurisdictional natural gas distribution utility that incurs extraordinary costs associated with ensuring their customers or the customers of interconnected Kansas utilities that are non-jurisdictional to the Commission continue to receive utility service during Winter Storm Uri to defer those costs to a regulatory asset account.³

¹ Emergency Order, 21-GIMX-303-MIS, Feb. 15, 2021, ¶ 3.

² *Id.*

³ *Id.* ¶ 4.

The Commission mandated that once Winter Storm Uri ended, and after all costs have been accumulated and recorded, each jurisdictional utility is directed to file a compliance report in the 21-303 Docket detailing the extent of such costs incurred, and present a plan to minimize the financial impacts of this event on ratepayers over a reasonable time frame.⁴

2. On March 9, 2021, the Commission issued an Order Adopting Staff's Report and Recommendation to Open Company-Specific Investigations, which initiated this Docket.⁵ The Commission's Order also included a Protective/Discovery Order.

3. On June 10, 2021, the Commission issued a Supplemental Protective and Discovery Order to allow the Office of the Kansas Attorney General to review discovery produced in this Docket.⁶

4. On June 11, 2021, the Natural Gas Transportation Customer Coalition⁷ (NGTCC) filed a Motion to Amend the Protective Order, to prevent the following types of documents to be labeled as confidential:

- Requests by KGS for supplies of natural gas, made in February 2021;
- Responses by suppliers in response to requests by KGS for supplies of natural gas, made for usage in February 2021;
- Draft and final invoices of KGS to marketers and/or aggregators of natural gas, for alleged under delivery of natural gas supplies, for re-delivery by KGS to natural gas transport end use customers for usage in February 2021; and

⁴ *Id.* ¶ 5.

⁵ Order Adopting Staff's Report and Recommendation to Open Company-Specific Investigations; Order on Petitions to Intervene of Bluemark Energy, LLC and CURB; Protective and Discovery Order, 21-303 Docket, March 9, 2021, ¶ 10.

⁶ Supplemental Protective and Discovery Order, June 10, 2021, ¶ 6.

⁷ NGTCC was granted intervention on July 1, 2021.

- All invoices tendered to KGS by natural gas suppliers, and all amounts paid by KGS to those suppliers for February 2021 natural gas usage, including any KGS-purchaser reservation of rights letters sent to suppliers or like-kind qualified payments.⁸

In acknowledging its request was “not in the normal course,”⁹ NGTCC claimed the documents are of the highest interest to the public, and the Kansas Legislature,¹⁰ and therefore should not be treated as confidential.

5. On July 20, 2021, the Commission denied NGTCC’s Motion to Amend the Protective Order as premature, explaining that if NGTCC or other parties believe information has been improperly designated confidential or if they believe public disclosure of specific identifiable confidential information is warranted under the framework of K.S.A. 66-1220a, they can move to have those specific documents made public if and when such information is designated as confidential.¹¹

6. On July 22, 2021, NGTCC filed a Petition for Reconsideration of the Order Denying Motion to Amend Protective Order; Order Directing the Parties to Submit a Proposed Procedural Schedule. On August 2, 2021, NGTCC filed a Motion to Designate as Public Documents the February 2021 Supplier Invoices Paid by Kansas Gas Service Company (KGS), rendering its Petition for Reconsideration moot.¹² In its August 2 Motion, NGTCC explained

⁸ Motion to Amend the Protective Order, June 11, 2021, ¶ 1.

⁹ *Id.*, ¶ 4.

¹⁰ *Id.*, ¶ 2.

¹¹ Order on Motion to Amend Protective Order; Order Directing the Parties to Submit a Proposed Procedural Schedule, July 20, 2021, ¶ 19.

¹² The Petition for Reconsideration was denied by operation of law on August 23, 2021. *See* K.S.A. 77-529(b).

that in response to its good faith request to KGS to make natural gas supplier invoices “public,” KGS deemed all supplier invoices as “Confidential” and exempt from public disclosure.¹³

7. On August 11, 2021, KGS filed its Objection to NGTCC’S Motion to Designate as Public Documents, asserting the February 2021 Supplier Invoices satisfy the definition of “trade secret” as defined by K.S.A. 60-3320,¹⁴ because: (1) making the details of Supplier Invoices, including the natural gas supply contract information publicly available would place the parties to those gas supply contracts at a competitive disadvantage;¹⁵ and (2) KGS has taken reasonable efforts to maintain the secrecy and confidentiality of these documents.¹⁶ KGS also claimed the February 2021 Supplier Invoices qualify as proprietary commercial or financial information as set forth by the U.S. Supreme Court, the Kansas Supreme Court, and FOIA, and that NGTCC presented no persuasive arguments to compel the release of “trade secret” and “confidential information”.¹⁷

8. On August 12, 2021, Commission Staff (Staff) filed its Response to NGTCC’S Motion to Designate as Public Documents the February 2021 Supplier Invoices paid by Kansas Gas Service Company.¹⁸ While acknowledging the extraordinary nature of Winter Storm Uri, Staff does not believe it justifies deviating from traditional Commission practice related to confidentiality.¹⁹ Staff also notes all of the parties to the Docket that have signed a non-disclosure agreement have access to the confidential information.²⁰ Staff believes NGTCC has

¹³ Motion to Designate as Public Documents, the February 2021 Supplier Invoices Paid by Kansas Gas Service Company (KGS), July 22, 2021, ¶¶ 9-10.

¹⁴ Objection of Kansas Gas Service to Natural Gas Transportation Customer Coalition’s Motion to Designate as Public Documents, Aug. 11, 2021, ¶ 13.

¹⁵ *Id.*, ¶ 14.

¹⁶ *Id.*, ¶ 15.

¹⁷ *Id.*, ¶¶ 16-18.

¹⁸ Response of Commission Staff to the Natural Gas Transportation Customer Coalition’s Motion to Designate as Public Documents the February 2021 Supplier Invoices paid by Kansas Gas Service Company, Aug. 12, 2021, ¶ 20.

¹⁹ *Id.*

²⁰ *Id.*

not made a sufficient showing that disclosure of the requested confidential information is warranted under K.S.A. 66-1220a because: (1) public disclosure would not significantly aid the Commission in conducting a thorough investigation into the events of the Winter Storm Uri; (2) Staff, which is tasked with representing the public generally, is already engaged in an extensive investigation into KGS and its operations during the Winter Storm Uri; and (3) any benefit to the public that could potentially be derived from disclosure is far outweighed by the harm to come from that disclosure.²¹

9. On August 13, 2021, NGTCC filed a Motion to Make Public a Document of KGS, concerning Data Requests (DRs) issued by Staff to KGS seeking the estimated usage for KGS' sales customers (non-Transportation customers) for the month of February 2021 and the actual usage.²² NGTCC claims the DR response contains no confidential information and is merely a simple volumetric historical listing.²³ NGTCC sees no harm to KGS and great benefits to the general public and the Commission by explaining to the public in a single, concise document, the impact that the prolonged cold temperatures had on our state and the volumes of gas required to sustain Kansas families and businesses during February 2021.²⁴ NGTCC also requests the Commission order KGS to pay \$660 of its attorney fees, incurred in preparing its Motion.²⁵

10. On August 23, 2021, KGS filed an Objection to NGTCC's Motion to Make Public a Confidential Response from KGS to Commission Staff, explaining the estimated and actual usage data contained in its confidential response satisfies the first prong of Kansas's two-

²¹ *Id.*, ¶ 21.

²² Motion of the Natural Gas Transportation Customer Coalition to Make Public a Document of Kansas Gas Service Company, Aug. 13, 2021, ¶ 1.

²³ *Id.*, ¶ 11.

²⁴ *Id.*, ¶ 14.

²⁵ *Id.*, ¶ 15.

prong trade secret analysis because that information has independent economic value in the natural gas commodity industry, an unregulated and highly competitive market.²⁶ KGS asserts that if the Commission discloses the amount of gas estimated and purchased, then this information can be exploited by these or other natural gas suppliers in the future by giving them critical insights into how much gas Kansas Gas Service needs for a given window, resulting in higher gas supply costs for Kansas Gas Service's customers.²⁷ KGS reiterates it has taken reasonable efforts to maintain the secrecy and confidentiality of the documents produced in response to Staff's DR, satisfying the second prong of the trade secret definition.²⁸ As with NGTCC's other pending motion, KGS contends NGTCC has failed to assert facts that satisfy the four factors of K.S.A. 66-1220a(a).²⁹

11. On September 9, 2021, the Commission denied NGTCC's Motions to Designate the February 2021 Supplier Invoices and KGS' Responses to Staff's DR as public documents, finding the documents qualify as trade secrets under K.S.A. 66-3320 and that disclosure is not warranted after considering the factors enumerated in K.S.A. 66-1220a(a).³⁰ The Commission explained disclosure of the documents will not aid the Commission in fulfilling its functions because Staff already has access to the documents, as do the other parties, including NGTCC and the Office of the Kansas Attorney General (AG).³¹

12. On September 17, 2021, NGTCC sought reconsideration of the Commission's Order denying its motions to designate confidential material as public on the basis that KGS has

²⁶ Objection of Kansas Gas Service to Natural Gas Transportation Customer Coalition's Motion to Make Public a Confidential Response by the Kansas Gas Service to the Kansas Corporation Commission Staff, Aug. 23, 2021, ¶ 15.

²⁷ *Id.*

²⁸ *Id.*, ¶ 16.

²⁹ *Id.*, ¶ 18.

³⁰ Order Denying NGTCC's Motions to Remove Confidential Designations for Certain Documents, Sept. 9, 2021, ¶ 15.

³¹ *Id.*, ¶¶ 16, 17.

failed to provide critical information to the determination of this Disclosure Issue/Confidentiality Issue to the Commission.³² Specifically, NGTCC cites to The Base Contract” or the NAEBS Contract and its effect on confidentiality.³³ Section 15.10 of the Base Contract states, “The existence of this Contract is not subject to confidentiality obligation. . . . The terms of any transaction hereunder shall be kept confidential by the parties hereto for one year from the expiration of the transaction.”³⁴ NGTCC freely admits that one year has not passed since February 2021, but believes that the fact that the parties agreed to a time limited confidentiality term should be taken into consideration by the Commission.³⁵

13. On September 22, 2021, NGTCC supplemented its Petition for Reconsideration to claim the prefiled Testimony of KGS Witness Robbins discloses the names of the Suppliers, and the Invoice amounts for each Supplier, stripping them of their confidentiality.³⁶ NGTCC claims by publicly disclosing elements of the Supplier Invoices, KGS demonstrates: (1) the Supplier Invoices are not trade secrets and (2) by disclosing the information on the KCC’s website for an extended period of time, KGS has waived any trade secret status.³⁷

14. Assuming the form contract language cited by NGTCC is operative in the KGS contracts, the one-year period referenced in Section 15.10 has not run, so certain terms of the Base Contracts are still deemed confidential by its signatories. However, as NGTCC suggests at paragraphs 23-24 of its Petition, the existence of such contracts and the parties to those contracts are not confidential and should be subject to public disclosure. Furthermore, certain other terms of the contracts may not contain trade secrets or be otherwise commercially-sensitive.

³² Motion for Reconsideration of the Commission’s Order of September 9, 2021 Denying NGTCC’s Motions to Remove Confidential Designations for Certain Documents, Sept. 17, 2021, p. 1.

³³ *Id.*

³⁴ *Id.*, p. 2.

³⁵ *Id.*, ¶ 25.

³⁶ Natural Gas Transportation Customer Coalition’s Supplement to its Petition for Reconsideration, Dated September 17, 2021, Sept. 22, 2021, ¶¶ 2, 3.

³⁷ *Id.*, ¶ 9.

15. NGTCC's supplemental filing suggests the items it seeks to be made public are already public, as NGTCC belatedly discovered. Thus, the Commission questions whether the primary thrust of NGTCC's Petition for Reconsideration is now moot. That said, NGTCC now appears to claim that because KGS publicly disclosed some elements of the Supplier Invoices, all information in the invoices should be available to the public. The Commission rejects this argument. NGTCC ignores that the aspects of the Invoices that are competitively sensitive, namely the margin/reservation fees KGS paid to procure gas, have been redacted. NGTCC has made no showing that the margin/reservation fees KGS paid to procure gas are not trade secrets or confidential. Simply because one element of a document is public does not render all elements of the document public. Otherwise, redactions would be pointless, and rather than produce redacted documents, parties would simply file confidential pleadings. The margin/reservation fees KGS paid to procure gas remain commercially sensitive, and properly redacted.

16. As noted in paragraph 14 above, the Commission agrees with the NGTCC position that certain elements of the KGS supplier contracts and invoices are not confidential and withholding such information has no legitimate basis. This Commission has never allowed "blanket" confidential designations of documents, and it will not allow such a practice in this case. Commission orders and regulations require a party to individually identify and justify redactions of confidential information.³⁸ With respect to the information sought by NGTCC in this case, this rule requires KGS to furnish supplier contracts and invoices and individually identify and justify any confidential designations. While the Commission continues to find certain aspects of the documents referenced by NGTCC are subject to protection, it is not clear to

³⁸ K.A.R. 82-1-221a; Order Adopting Staff's R&R to Open Company-Specific Investigations; Order on Petitions to Intervene of Bluemark and CURB; Protective and Discovery Order, Mar. 9, 2021, ¶ 17.

the Commission that KGS has supplied public versions of such documents with only those portions redacted. As NGTCC notes, public versions of certain supplier invoices are attached with KGS' pre-filed testimony. However, to eliminate any confusion of the record and ensure the public can view as much of KGS' gas supply information as possible, the Commission orders KGS to file public versions of all its supplier contracts and invoices relevant to the winter weather event period. Consistent with the above findings and those of prior orders, KGS should specifically identify and provide its justifications where trade secrets or commercially-sensitive information is redacted.

THEREFORE, THE COMMISSION ORDERS:

- A. NGTCC's Petition for Reconsideration is granted in part and denied in part.
- B. KGS shall file public versions of all its supplier contracts and invoices relevant to the winter weather event period in this docket within 10 days of the date of this Order.
- C. This Order constitutes non-final agency action.³⁹

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Duffy, Commissioner

10/14/2021

Dated: _____



Lynn M. Retz
Executive Director

BGF

³⁹ K.S.A. 77-607(b)(2).

CERTIFICATE OF SERVICE

21-KGSG-332-GIG

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of
10/14/2021
electronic service on _____.

ALEX GOLDBERG, ATTORNEY AT LAW
ALEX GOLDBERG
909 Bannock Street
Ste 1524
Denver, CO 80204
alexantongoldberg@gmail.com

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

SHELLY M BASS, SENIOR ATTORNEY
ATMOS ENERGY CORPORATION
5430 LBJ FREEWAY
1800 THREE LINCOLN CENTRE
DALLAS, TX 75240
shelly.bass@atmosenergy.com

KEVIN C FRANK, SENIOR ATTORNEY
ATMOS ENERGY CORPORATION
5430 LBJ FREEWAY
1800 THREE LINCOLN CENTRE
DALLAS, TX 75240
kevin.frank@atmosenergy.com

JEFF AUSTIN
AUSTIN LAW P.A.
7111 W. 15th St.
Suite 315
Overland Park, KS 66223
jeff@austinlawpa.com

JULIE AGRO
BLUEMARK ENERGY
4200 East Skelly Drive
Suite 300
Tulsa, OK 74135
jagro@bluemarkenergy.com

MIKE WESTBROCK
BLUEMARK ENERGY
4200 East Skelly Drive
Suite 300
Tulsa, OK 74135
westbrock@bluemarkenergy.com

LARRY WEBER
BONAVIA PROPERTIES, LLC
Garvey Center
250 W. Douglas, Suite 100
Wichita, KS 67202
larry@garveycenter.com

C. EDWARD PETERSON
C. EDWARD PETERSON, ATTORNEY AT LAW
5522 ABERDEEN
FAIRWAY, KS 66205
ed.peterson2010@gmail.com

BRYAN R. COULTER
CATHOLIC DIOCESE OF WICHITA
424 N. Broadway
Wichita, KS 67202
bryan.coulter@catholicdioceseofwichita.org

CERTIFICATE OF SERVICE

21-KGSG-332-GIG

JOSEPH R. ASTRAB, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
j.astrab@curb.kansas.gov

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.love@curb.kansas.gov

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.nickel@curb.kansas.gov

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
s.rabb@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

JOSHUA HARDEN
COLLINS & JONES, P.C.
1010 W. Foxwood Drive
Raymore, MO 64083
jharden@collinsjones.com

KERRY MORGAN
COLLINS & JONES, P.C.
1010 W. Foxwood Drive
Raymore, MO 64083
kmorgan@collinsjones.com

DARCY FABRIZIUS
CONSTELLATION NEWENERGY-GAS DIVISON, LLC
1001 Louisiana Street
Suite 2300
Houston, TX 77002
darcy.fabrizius@constellation.com

LYNDA FOHN
CONSTELLATION NEWENERGY-GAS DIVISON, LLC
1001 Louisiana St., Ste. 2300
HOUSTON, TX 77002
lynda.fohn@constellation.com

JEREMY L. GRABER
FOULSTON SIEFKIN LLP
822 S Kansas Avenue
Suite 200
Topeka, KS 66612-1203
jgraber@foulston.com

JACOB G HOLLY, ATTORNEY
FOULSTON SIEFKIN LLP
822 S Kansas Avenue
Suite 200
Topeka, KS 66612-1203
jholly@foulston.com

C. EDWARD WATSON II., ATTORNEY
FOULSTON SIEFKIN LLP
1551 N WATERFRONT PKWY STE 100
WICHITA, KS 67206-4466
cewatson@foulston.com

CERTIFICATE OF SERVICE

21-KGSG-332-GIG

MONTGOMERY ESCUE, CONSULTANT
FREEDOM PIPELINE, LLC
PO BOX 622377
OVIEDO, FL 63762
montgomery@escue.com

KIRK HEGER
FREEDOM PIPELINE, LLC
1901 UNIVERSITY DRIVE
LAWRENCE, KS 66044
kirkheger@gmail.com

AMY L. BAIRD
JACKSON WALKER L.L.P.
1401 McKinney St.
Suite 1900
Houston, TX 77010
abaird@jw.com

JESSE LOTAY
JACKSON WALKER L.L.P.
1401 McKinney St.
Suite 1900
Houston, TX 77010
jlotay@jw.com

MELANIE S. JACK, ASSISTANT ATTORNEY GENERAL
KANSAS ATTORNEY GENERAL
Consumer Protection Division
120 SW 10th Ave., 2nd Flr.
Topeka, KS 66612
melanie.jack@ag.ks.gov

KIMBERLEY DAVENPORT MEGRAIL, ASSISTANT
ATTORNEY GENERAL
KANSAS ATTORNEY GENERAL
Consumer Protection Division
120 SW 10th Ave., 2nd Flr.
Topeka, KS 66612
kim.davenport@ag.ks.gov

DEREK SCHMIDT, KANSAS ATTORNEY GENERAL
KANSAS ATTORNEY GENERAL
Consumer Protection Division
120 SW 10th Ave., 4th Flr.
Topeka, KS 66612
derek.schmidt@ag.ks.gov

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
b.fedotin@kcc.ks.gov

CARLY MASENTHIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
c.masenthin@kcc.ks.gov

TERRI PEMBERTON, CHIEF LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.pemberton@kcc.ks.gov

JANET BUCHANAN, DIRECTOR- REGULATORY AFFAIRS /
OKE 13165
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.
7421 W 129TH ST
OVERLAND PARK, KS 66213-2713
janet.buchanan@onegas.com

GLENDA CAFER, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
gcafer@morrislaing.com

CERTIFICATE OF SERVICE

21-KGSG-332-GIG

KYLER C. WINEINGER, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
kwineinger@morrislaing.com

FRANK A. CARO, JR., ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
fcaro@polsinelli.com

ANDREW O. SCHULTE, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
aschulte@polsinelli.com

RICHARD A. HOWELL, ATTORNEY AT LAW
RICHARD A. HOWELL
1401 McKinney Street
Suite 1900
Houston, TX 77010
rahowell@jw.com

RICHARD L. HANSON
RICHARD L. HANSON
16171 ROAD I
LIBERAL, KS 67901
rlhanson@wbsnet.org

LEE M. SMITHYMAN, ATTORNEY
SMITHYMAN & ZAKOURA, CHTD.
7421 WEST 129th STREET
OVERLAND PARK, KS 66213-2634
lee@smizak-law.com

CONNOR A. THOMPSON
SMITHYMAN & ZAKOURA, CHTD.
7421 WEST 129th STREET
OVERLAND PARK, KS 66213-2634
connor@smizak-law.com

JAMES P. ZAKOURA, ATTORNEY
SMITHYMAN & ZAKOURA, CHTD.
7421 WEST 129th STREET
OVERLAND PARK, KS 66213-2634
jim@smizak-law.com

KELLY A. DALY
SNELL & WILMER, LLP
One Arizona Center
Phoenix, AZ 85004
kdaly@swlaw.com

STACY WILLIAMS, GENERAL COUNSEL
SYMMETRY ENERGY, LLC
1111 Louisiana St.
Houston, TX 77002
stacy.williams@symmetryenergy.com

JASON TRENARY
TEMPLELIVE WICHITA LLC
5104 S. Pinnacle Hills Pkwy.
Suite 1B
Rogers, AR 72758
jtrenary@beatycap.com

TIMOTHY E. MCKEE, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
temckee@twgfirm.com

CERTIFICATE OF SERVICE

21-KGSG-332-GIG

DON KRATTENMAKER, VICE PRESIDENT
WOODRIVER ENERGY, LLC
633 17th St., Ste. 1410
Denver, CO 80202
don.krattenmaker@woodriverenergy.com

CHARLENE BALLARO WRIGHT
WRIGHT LAW FIRM
717 Texas Street
Suite 1200
Houston, TX 77002
cwright@wrightfirm.law

/S/ DeeAnn Shupe

DeeAnn Shupe