

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 Its Purchase of Southern Star Central Gas)
Pipeline, Inc.'s Facilities Used to Furnish Natural Gas)
Service to Certain Customers and Approval of)
Customer-Specific Certificates of Public)
Convenience and Necessity to Serve Said Customers.)

Docket No. 24-KGSG-237-CON

**MOTION FOR EXTENSION OF TIME
TO FILE SETTLEMENT AGREEMENT AND
TESTIMONY IN SUPPORT/OPPOSITION OF SETTLEMENT**

Kansas Gas Service, a division of ONE Gas, Inc. ("Kansas Gas Service"), moves for an order from the Kansas Corporation Commission ("Commission") approving an extension of time to file a Settlement Agreement and Testimony in Support/Opposition of a Settlement Agreement in the above-captioned docket. In support of its motion, Kansas Gas Service states as follows:

1. On September 5, 2023, Kansas Gas Service filed an application, supporting testimony and associated exhibits pursuant to K.S.A. 66-101, *et seq.*, 66-104, 66-117, 66-131, 66-136, 66-1,200 *et seq.*, and other applicable statutes, requesting approval by the Kansas Corporation Commission ("Commission" or "KCC") of a transaction whereby Kansas Gas Service acquires certain assets of Southern Star pursuant to the terms and conditions contained in an Asset Purchase Agreement dated December 16, 2022 ("APA"). The assets include meters and other facilities that Southern Star currently uses to provide service to domestic customers mostly pursuant to provisions of right-of-way easements. Southern Star has been engaged in an ongoing effort to eliminate ownership and operation of domestic meters on its system by transferring the meters and facilities to qualified local distribution companies. This will allow Southern Star to focus on operating its interstate transmission system while ensuring affected customers continue to receive safe and reliable service from a qualified

operator.

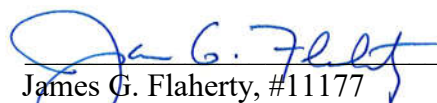
2. The Citizens' Utility Ratepayer Board ("CURB"), the Kansas Municipal Gas Agency ("KMGA"), and Southern Star Central Gas Pipeline, Inc. ("Southern Star") were all granted permission to intervene in this docket.

3. The parties began settlement discussions on May 23, 2024, in accordance with the Procedural Schedule adopted by the Commission on January 16, 2024 ("Procedural Order").

4. Pursuant to the Procedural Order, the settlement agreement was to be filed on or before June 3, 2024.

5. Because the parties are still in settlement discussions, Kansas Gas Service is requesting the Commission issue an order approving an extension of the June 3, 2024 date on which to file a settlement agreement to June 10, 2024, and an extension of the June 10, 2024 date on which to file testimony on the settlement agreement to June 17, 2024. None of the parties oppose this extension.

WHEREFORE, for the reasons set forth herein, Kansas Gas Service requests that its motion for extension of time to file a settlement agreement and testimony in support/opposition of the settlement agreement be granted.



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

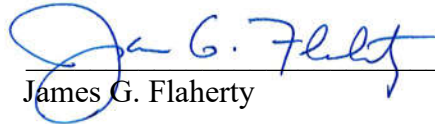
Robert Elliott Vincent, #26028
KANSAS GAS SERVICE
7421 West 129th Street
Overland Park, Kansas 66213-2634
(913) 319-8615, telephone
(913) 319-8622, facsimile
robert.vincent@onegas.com

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 an attorney for Kansas Gas Service, a Division of ONE Gas, Inc., and is duly authorized to make this affidavit; that he has read the foregoing Motion for Extension of Time to File Settlement Agreement and Testimony in Support/Opposition of Settlement, 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 3rd day of June, 2024.





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 3rd day of June, 2024, addressed to:

JOSEPH R. ASTRAB
j.astrabb@curb.kansas.gov

LYN LEET
lyn.leet@onegas.com

TODD E. LOVE
t.love@curb.kansas.gov

ROBERT E. VINCENT
robert.vincent@onegas.com

DAVID W. NICKEL
d.nickel@curb.kansas.gov

PAUL MAHLBERG
mahlberg@kmea.com

SHONDA RABB
s.rabb@curb.kansas.gov

TERRI J. PEMBERTON
pemberton@kmea.com

DELLA SMITH
d.smith@curb.kansas.gov

DARREN L. PRINCE
prince@kmea.com

BRIAN G. FEDOTIN
b.fedotin@kcc.ks.gov

DIXIE RIEDEL
riedel@kmea.com

BRETT W. BERRY
b.berry@kcc.ks.gov

W. RICK GRIFFIN
wgriffin@martinpringle.com

CARLY R. MASENTHIN
c.masenthin@kcc.ks.gov

JOHN S. WATHEN
john.wathen@southernstar.com

JANET L. BUCHANAN
janet.buchanan@onegas.com


James G. Flaherty