## 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 to Cease Providing Natural Gas Service in a Portion of McPherson County, Kansas. ) ) ) Docket No. 24-KGSG-056-CCS

## **PETITION FOR ADDITIONAL TIME**

In The Matter of The Application of Kansas Gas Service, a Division of ONE Gas, Inc. For Approval to Cease Providing Natural Gas Service in a Portion of McPherson County, Kansas

Petition regarding Docket No. 24-KGSG-056-CCS

I request that any consideration of Docket No. 24-KGSG-056-CCS, the Kansas Gas Service petition to cease service at 1198 Sioux Road, Lindsborg, Kansas, be suspended until Kansas Gas Service and I have completed negotiations over the terms of settlement between myself and Kansas Gas Service.

The pending petition to cease service raises a number of issues including, but not limited to (i) the basis of the approximately \$375,000 (before overheads and contingency for additional construction costs) to replace the PVC pipeline; (ii) the basis for the statement that the PVC pipeline is "unlocatable" in view of commercially available ground penetrating radar systems that are available to rent; (iii) the basis of the reclassification of the line from "transmission pipeline" to "distribution asset;" (iv) the basis of determination that "the facilities must either be replaced or service terminated" in the absence of any inspection; as well as the (v) the estimated cost basis for conversion of the facilities at 1198 Sioux Road to an alternative energy basis.

Proceeding with consideration of the KGS petition without at least items (i) – (iv) from KGS would unfairly preference Kansas Gas Service and be to my gross disadvantage.

Additionally, the petition to cease service was utterly unexpected. I am working to obtain Necessary information, including estimates on the cost of converting from natural gas to Some available option, whether that is geothermal, or propane. It has taken time, and will take time to collect and evaluate the pertinent information. It may be October or November before this process is close to completion.

Dated: 08/22/2023

/s/Frank Shaw Frank Shaw 1198 Sioux Road Lindsborg, KS 67456 anotherfrankshaw@gmail.com

## **CERTIFICATE OF SERVICE**

## 24-KGSG-056-CCS

I, the undersigned, certify that a true copy of the attached Petition has been served to the

following by means of electronic service on  $\frac{08/22}{2023}$ .

BRETT W. BERRY, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 b.berry@kcc.gov

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