## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Golden	)	
11	,	
Gas Service Company for a Certificate of	)	
Convenience and Necessity to Operate an	)	
Intrastate Natural Gas Storage and Pipeline	)	Docket No. 25-GGSG-459-COC
Facility in Kiowa County, Kansas and for	)	
Approval of Initial Terms and Conditions for	)	
Services and Rates	)	

## RESPONSE TO STAFF'S REPORT AND RECOMMENDATION

Golden Gas Service Company ("GGSC") provides the following response to the Staff of the Kansas Corporation Commission ("Staff") Report and Recommendation filed on October 1, 2025 ("R&R") in the above-captioned matter.

- 1. On October 1, 2025, Staff filed its R&R recommending the following conditions:
  - 1. GGSC shall file a notice in a compliance docket once it has received all required permits from the Kansas Department of Health and Environment (KDHE).
  - 2. GGSC shall file in a compliance docket signed contracts for construction, operations and interstate pipeline interconnections.
  - 3. GGSC shall file notice in a compliance docket if it applies to FERC for any expanded interstate jurisdictional authority or an exemption from FERC jurisdiction under the Hinshaw Exemption.<sup>1</sup>
  - 4. GGSC shall file quarterly informational updates on overall progress made on its project development, in a compliance docket. These quarterly updates shall continue until the project has been operational for three years.

<sup>&</sup>lt;sup>1</sup>A Hinshaw exemption is found in Section 1(c) of the Natural Gas Act, which exempts from FERC's jurisdiction any entity that satisfies the definition of "natural gas company" if that entity satisfies three conditions: (1) the entity receives all gas at or within the boundary of a state; (2) all the gas is consumed within that state, and (3) the pipeline is regulated by a "State Commission." This exemption is referred to as the "Hinshaw" exemption after the Congressman who introduced the bill to amend the Natural Gas Act to add this exemption.

2. GGSC has reviewed the Staff's R&R and agrees to comply with the recommended conditions.

WHEREFORE, Golden Gas Service Company requests the Commission issue an order approving the recommendations made by Staff in its R&R.

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## **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 Golden Gas Service Company, named in the foregoing Response to Staff's Report and Recommendation and is duly authorized to make this affidavit; that he has read the foregoing and 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 9<sup>th</sup> day of October, 2025.

NOTARY PUBLIC - State of Kansas RONDA ROSSMAN My Appt. Expires May 25, 2026 Ronda Rossman 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  $9^{th}$  day of October, 2025, addressed to:

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