

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

In the Matter of the Investigation of Kansas Gas Service, A Division of ONE Gas Regarding Violations of the Kansas Underground Utility Damage Prevention Act (KUUDPA) (K.S.A. 66-1801, et seq., and K.A.R. 82-14-1 through 82-14-5) and the Commission’s Authority to Impose Penalties and/or Sanctions (K.S.A. 66-1,151).)
Docket No. 24-DPAX-895-PEN

REQUEST FOR HEARING

Kansas Gas Service, a division of ONE Gas, Inc. (“Kansas Gas Service” or “Company”), pursuant to K.A.R. 82-14-6, K.A.R. 82-1-232, and K.S.A. 66-1,152, respectfully requests a hearing on the Commission’s September 24, 2024, Penalty Order issued in the instant matter. In support thereof, Kansas Gas Service states the following to the State Corporation Commission of the State of Kansas (“Commission”):

1. On September 24, 2024, the Commission issued a \$47,000 civil penalty to Kansas Gas Service for alleged violations of the Kansas Underground Utility Damage Prevention Act (“KUUDPA”).

2. KUUDPA allows the Staff of the Commission and respondents to discuss and present compromises of civil penalties to the Commission for review. See K.A.R. 82-14-6(f) and (j); K.S.A. 66-1812; K.S.A. 66-1,152.

3. In Docket No. 21-KGSG-398-SHO, the Commission approved a settlement between Kansas Gas Service and Commission Staff, wherein Kansas Gas Service’s civil penalty was directed to educational institutions with pipeline safety focused programs.

4. Kansas Gas Service requests the Commission set this matter for hearing and allow Commission Staff and Kansas Gas Service to evaluate a similar compromise on the Penalty Order.

WHEREFORE, Kansas Gas Service respectfully requests a hearing on the Penalty Order

to evaluate compromise options, and for such further relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Robert Elliott Vincent
Robert Elliott Vincent, KS Bar #26028
Kansas Gas Service,
A division of ONE Gas, Inc.
7421 West 129th Street
Overland Park, Kansas 66213-2634
Phone: (913) 319-8615
Fax: (913) 319-8622
Email: robert.vincent@onegas.com

Attorney for Kansas Gas Service,
a division of ONE Gas, Inc.

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF JOHNSON)

I, Robert Elliott Vincent, of lawful age, being first duly sworn upon oath, states as follows:
I am a Managing Attorney for Kansas Gas Service, a Division of ONE Gas, Inc. I have read the
above *Request for Hearing* and all the statements therein are true to the best of my knowledge,
information, and belief.


Robert Elliott Vincent

Affiant

SUBSCRIBED AND SWORN to before me on 10/9/24.


Notary public

My Appointment Expires:
6/5/26



CERTIFICATE OF SERVICE

I, Robert Elliott Vincent, hereby certify that a copy of the above and foregoing *Request for Hearing* was forwarded this 9 day of October, 2024, addressed to:

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Ahsan.Latif@ks.gov

CARLY MASENTHIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Carly.Masenthin@ks.gov

SEAN POSTLETHWAIT, VICE PRESIDENT - OPERATIONS
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.
7421 W 129TH STREET
OVERLAND PARK, KS 66213
SEAN.POSTLETHWAIT@ONEGAS.COM

JANET BUCHANAN, DIRECTOR OF RATES & REGULATORY
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.
7421 W 129TH STREET
OVERLAND PARK, KS 66213
janet.buchanan@onegas.com

ROBERT E. VINCENT, MANAGING ATTORNEY
KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC.
7421 WEST 129th STREET
OVERLAND PARK, KS 66213-2634
robert.vincent@onegas.com

/s/ Robert Elliott Vincent
Robert Elliott Vincent, KS Bar No. 26028
Managing Attorney
KANSAS GAS SERVICE
A Division of ONE Gas, Inc.
7421 West 129th Street
Overland Park, Kansas 66213-5957
(913) 319-8615 Phone
(913) 319-8622 Fax
robert.vincent@onegas.com