

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

In the Matter of a General Investigation )  
Updating the Certificates of Convenience and )  
Necessity Issued to Kansas Gas Service, a )  
Division of ONE Gas, Inc. and Black ) Docket No. 25-GIMG-114-GIG  
Hills/Kansas Gas Utility Company, LLC d/b/a )  
Black Hills Energy in Cowley, Sedgwick, )  
Sumner, Reno, and Rice Counties to Provide )  
Retail Natural Gas Service. )

**JOINT MOTION TO SUSPEND PROCEDURAL SCHEDULE**

The Staff of the State Corporation Commission of the State of Kansas (“Staff”), Kansas Gas Service, a division of ONE Gas, Inc. (“Kansas Gas Service”), and Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills Energy (“Black Hills”) collectively “Joint Movants” respectfully request the Commission suspend the procedural schedule in this docket for 120 days. In support thereof, the Joint Movants state the following to the State Corporation Commission of the State of Kansas (“Commission”):

1. On October 22, 2024, the Commission opened this docket to address issues related to Kansas Gas Service and Black Hills’ service territory in Goddard, Kansas, and five nearby counties (Cowley, Sedgwick, Sumner, Reno, and Rice). The Commission divided this docket into two phases, with the first addressing Goddard, Kansas, and the second addressing the counties. The Goddard, Kansas, portion of this docket has concluded.

2. In accordance with this docket’s procedural schedule, on July 18, 2025, KGS and Black Hills submitted Reply Comments on a certification plan. While the schedule contemplates Commission Staff reviewing the comments and submitting a Report and Recommendation, the Joint Movant’s believe this schedule should be modified to allow for settlement negotiations.

3. The Joint Movants respectfully request the procedural schedule be suspended for 120 days to allow for settlement discussions between the Joint Movants. At the end of the 120-

day suspension, the Joint Movants hope to submit a joint certification plan for Commission review. Prior certificate boundary and seams disputes have been resolved using a similar approach. Suspending the procedural schedule to allow for settlement discussions avoids the potential cost and time of resolving certificate disputes. Accordingly, the Joint Movants agree the public interest would be promoted by modifying the procedural schedule to allow for these negotiations.

4. On or before December 18, 2025, the Joint Movants will file a joint certification plan as mutually agreed to by the parties or a procedural schedule establishing a schedule for resolving any outstanding certificate boundary and seams disputes.

WHEREFORE, the Joint Movants respectfully request the Commission suspend the procedural schedule until December 18, 2025, set a deadline of December 18, 2025, to file a joint certification plan or modified procedural schedule, and for any other relief the Commission deems just and reasonable.

Respectfully submitted,

/s/ **Robert Elliott Vincent**

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# VERIFICATION

STATE OF KANSAS       )  
                                  ) ss  
COUNTY OF JOHNSON )

Robert Vincent of lawful age, being first duly sworn upon oath, deposes and states:  
That he is an attorney for Kansas Gas Service, a Division of ONE Gas, Inc.; that he has  
read the above and foregoing *Joint Motion to Suspend Procedural Schedule* and that the  
statements therein contained are true according to his knowledge, information and belief.

  
Robert Elliott Vincent

Subscribed and sworn before me this 19<sup>th</sup> day of August, 2025.

  
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 *Joint Motion to Suspend Procedural Schedule* was forwarded this 20th day of August 2025, addressed to:

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