

**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) Docket No. 23-KGSG-719-TAR
of Revisions to Certain Tariffs Controlling)
Transportation Service.)

PETITION TO INTERVENE OF SYMMETRY ENERGY SOLUTIONS, LLC

COMES NOW, Symmetry Energy Solutions, LLC (“Symmetry”) and petitions the State Corporation Commission of the State of the Kansas (“Commission”) for intervention in the above-captioned case pursuant to K.S.A. 77-521(a)–(b) and K.A.R. 82-1-225. In support of its petition, Symmetry states and alleges as follows:

1. On March 31, 2023, Kansas Gas Service, a Division of ONE Gas, Inc. (“Kansas Gas Service”) filed an application with the Commission for approval of revisions to certain tariffs controlling its Transportation Service.

2. Symmetry is a leading energy supplier providing over one trillion cubic feet of natural gas to more than 100,000 customers in over 30 states, including Kansas. Symmetry delivers gas to the Kansas Gas Service gas utility system, among others, to provide natural gas supply to Symmetry’s customers that are located behind the Kansas Gas Service utility system.

3. Pursuant to K.S.A. § 77-521, the presiding officer shall grant a petition for intervention if the petition meets the following requirements: “(1) the petition is submitted in writing to the presiding officer, with copies served upon all parties named in the presiding officer’s notice of the hearing, at least three business days before the hearing; . . . (2) the petition states facts demonstrating that the petitioner’s legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding; and . . . (3) the presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.” *Id.* § 77-521(a)(1)-(3). The statute further states

that “[t]he presiding officer may grant a petition for intervention at any time upon determining that the intervention sought is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.” *Id.* § 77-521(b).

4. Symmetry is a “Marketer Agent” as defined by Kansas Gas Service’s General Terms and Conditions because it is a third-party providing natural gas transportation services to Kansas Gas Service customers as the customer’s agent under the tariffs proposed to be revised by Kansas Gas Service.¹ Therefore, Symmetry is an entity that will or may be bound by any order issued by this Commission and may be substantially affected by the outcome of this proceeding or portions thereof. Accordingly, Symmetry’s legal interests, rights and duties will be directly affected by the outcome of this proceeding or portions thereof. Further, Symmetry’s interests in this proceeding are not adequately represented by any other party.

5. Symmetry notes that no procedural schedule has yet been set in this matter, and so its intervention will not disrupt or impair the orderly and prompt conduct of the proceedings.

6. For the reasons stated above, Symmetry has met the intervention standards set forth in K.S.A. § 77-521(a) and should be granted intervention in this matter.

7. Moreover, the Commission has broad discretion to grant permissive intervention pursuant to K.S.A. § 77-521(b), which permits the presiding officer to “grant a petition for intervention at any time upon determining that the intervention sought is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.” For the reasons stated above, Symmetry’s intervention is in the interests of justice and will not impair the orderly and

¹ See Kansas Gas Service, a Division of ONE Gas, Inc.’s General Terms and Conditions Tariff, §§ 1.01.02 (“Marketer Agent: An agent authorized by the Customer to perform transportation service-related activities for the Customer. A gas marketer must meet criteria established under Section 10 Requirements for Transportation Service”).

prompt conduct of the proceedings. Therefore, Symmetry has met the permissive intervention standards set forth in K.S.A. § 77-521(b) and should be granted intervention in this matter.

8. All pleadings, orders, notices, communications, and other documents relating this matter should be served on the undersigned counsel, and on the individual(s) listed below:

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WHEREFORE, Symmetry respectfully requests the Commission grant its Petition for Intervention in this Docket, and for all other such relief the Commission deems just and proper.

Respectfully submitted,

POLSINELLI PC

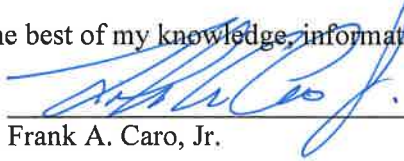
/s/ Frank A. Caro

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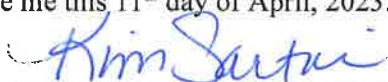
VERIFICATION

I, Frank A. Caro, Jr., being first duly sworn on oath, depose and state that I am counsel for Symmetry Energy Solutions, LLC, that I have read the foregoing pleading and I am familiar with its contents, and that the facts set forth are true to the best of my knowledge, information and belief.



Frank A. Caro, Jr.

SUBSCRIBED AND SWORN to before me this 11th day of April, 2023.



Notary Public

Appointment/Commission Expires:



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 11th day of April 2023, to the following:

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