

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

Recommendation to Open a General)
Investigation Updating the Certificates of)
Convenience and Necessity Issued to Kansas)
Gas Service, a Division of ONE Gas, Inc. and) Docket No. 25-GIMG-114-GIG
Black 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.)

**NOTICE OF FILING OF STAFF'S
REPORT AND RECOMMENDATION**

COMES NOW, the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively), and files the instant Report and Recommendation to recommend that the Commission initiate a general investigation to update the Certificates of Convenience and Necessity (“COCs”) issued to Kansas Gas Service, a Division of ONE Gas, Inc. (“KGS”) and Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills Energy (“BHE”) in Cowley, Sedgwick, Sumner, Reno, and Rice Counties.

The Investigation should focus on developing metes and bounds descriptions for the certificate seams (as opposed to allowing the boundaries to follow expansion of the city limits) between BHE and the 33 communities that have natural gas service from a different provider in the listed counties. Staff recommends the proposed certification plan also consider existing infrastructure and the capability of the utility to provide service in a buffer zone around the cities that currently have natural gas service.

Staff further recommends the Commission certify KGS to provide service based on the existing COCs that allow KGS to provide service within the city limits of Goddard.

WHEREFORE, Staff submits its Report and Recommendation for Commission review and consideration and for such other relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Carly R. Masenthin _____

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Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

Laura Kelly, Governor

FROM: Leo Haynos, Chief Engineer
Jeff McClanahan, Director of Utilities

DATE: July 18, 2024

SUBJECT: Recommendation to Open a General Investigation Updating the Certificates of Convenience and Necessity Issued to Kansas Gas Service and Black Hills Energy in Cowley, Sedgwick, Sumner, Reno, and Rice Counties to Provide Retail Natural Gas Service

EXECUTIVE SUMMARY:

On March 21, 2024, Black Hills Energy (BHE) and Kansas Gas Service (KGS) coordinated a meeting with Commission Staff to discuss a dispute between the two companies regarding their respective service territories in and around the city of Goddard (Goddard) in Sedgwick County. Because the dispute involves gas service certificates and Commission decisions dating from the 1920s, Staff believes the resolution of this dispute should be decided by the Commission.

Current public utility service territory descriptions in Kansas reference measurements based on the Public Land Survey System denoted as distances from township, range and section lines. However, for some of the early 1920-1930s Certificates of Convenience (COC) granted to KGS and BHE predecessor companies, the service territory boundaries were based on political boundaries (i.e. the boundaries of county and city limits) instead of permanent reference points.

Because the Commission's COC issued to a KGS predecessor company (all KGS predecessors are referred to as KGS)¹ apparently described the service territory assigned to KGS as the "City of Goddard", KGS contends its certificate expands as the city of Goddard's boundaries have expanded through territory annexation. On the other hand, the COC issued to a BHE predecessor company (all BHE predecessors are referred to as BHE) specifically states that the BHE service territory excludes providing service within the city limits of any town in Sedgwick County except for a few towns named in the COC. In this case, Goddard is excluded from the BHE COC. Under the logic suggested by KGS, it would follow that any BHE facilities adjacent to the City of Goddard that are annexed into the city boundaries would become stranded because BHE is precluded from providing gas service within the city limits.

Since as early as 1911, the legislature assigned the Commission the authority to grant certificates of convenience to public utilities if the Commission determined that granting a COC would serve

¹ Staff has been unable to locate the original docket granting a certificate to serve the City of Goddard.

the public convenience and necessity.² Because of the use of political boundaries to define the service territories in these early vintage dockets, it appears the Commission may have created the unintended consequence of ceding its certification authority to the city annexation process. Staff contends the use of political boundaries to define service territory has become outdated and no longer supports the intended purpose of the COC to promote public convenience and necessity. Therefore, Staff recommends the Commission open a General Investigation into updating the COCs issued to KGS and BHE in Cowley, Sedgwick, Sumner, Reno, and Rice Counties.

It is our understanding that the current dispute between BHE and KGS regarding providing service in Goddard is related to a proposed residential housing development to be located on land annexed by Goddard in 2009. Therefore we recommend the Commission expedite its decision into this matter to provide direction to the developer as soon as possible.

BACKGROUND:

Based on research from the Commission's records, the BHE predecessor company, Consolidated Gas Utilities, was granted a COC to provide gas service outside of city limits in eight Kansas counties.³ This COC also included a few cities. In 1960, the Arkansas Louisiana Gas Company (ARKLA) purchased Consolidated Gas Utilities and the ARKLA certificate was revised to provide gas service outside of city limits in five counties, with the exception that ARKLA could provide gas service for the cities of Andale, Gueda Springs, Hutchison-commercial and industrial only, NW/4 23-38S-6W of Reno county (Morton Salt), Sterling, Maize, Nickerson, and Wichita (See Staff Exhibit 1). With little modification, the ARKLA COC from 1960 is the certificate which BHE operates under today. The five counties certificated to BHE for service outside of cities are: Cowley; Sedgwick; Sumner; Reno; and Rice.

Staff has been unable to locate the docket which granted KGS a certificate to provide gas service in Goddard; however there are several certificate dockets from the 1960s that acknowledge KGS has a certificate to serve the city. In Docket 64,714, dated February 1961, the Commission affirmed KGS's certificate to serve the city of Goddard, but denied KGS's application to provide service outside of the city limits except for a 500 foot strip along a pipeline connecting Wichita to Goddard. In 1964, KGS again requested a certificate to serve outside of the city of Goddard in Docket 75,015 (Staff Exhibit 2). In this case, the Commission granted KGS a certificate to serve eight square miles of territory between the city limits of Goddard and Wichita. The Order notes the territory in question was certificated to BHE. Although the Order granted a certificate to KGS, it did not cease the certificate for BHE. Therefore Staff believes the Commission effectively issued dual certificates for the territory applied for in the 75,015 Docket.

Sometime after the 1964 docket was issued, Goddard expanded its city boundaries through annexation, with the latest annexation thought to have occurred in 2009. Based on the provisions of the BHE certificate for this area (Docket 62,953), which precludes BHE from serving within

² See K.S.A. 66-131: (a) No ... public utility, ... governed by the provisions of this act shall transact business in the state of Kansas until it shall have obtained a certificate from the corporation commission that public convenience and necessity will be promoted by the transaction of said business and permitting said applicants to transact the business of a common carrier or public utility in this state...

³ Docket 16167, November 27, 1935.

the city boundaries of Goddard, Staff contends the annexation action by Goddard, effectively modified the Commission's certificate order for BHE.

In November of 1987, a similar certification/annexation scenario regarding a certificate dispute between KGS and BHE was brought before the Commission. This case was focused on providing gas service to several areas on the outskirts of the City of Lawrence.⁴ In that case, the Commission clearly rejected the proposition that annexation could be used to extend the service territory of a utility. In that case, the Commission stated:

“The Commission rejects the theory that annexation by cities automatically creates and extends authority for public utilities where they have not previously been certificated by the Commission. The Commission has sole authority to issue certificates pursuant to K.S.A 66-131 and it rejects the theory automatic dual certification occurs as a result of annexation. Henceforth, all certificates for public utilities to operate within the city limits of a city shall be based on a metes and bounds description of the area rather than allowing such rights to follow expansion of the city limits”.⁵

In 1999, another service territory dispute between BHE and KGS occurred in the City of Wichita. In that case, the dispute focused on dual certification and the practice of customers switching service between the two utilities. The Wichita territory certifications most likely originate from the same 1930s vintage dockets that resulted in the current dispute at Goddard. In the Wichita case, BHE and KGS are both allowed to serve customers in Wichita, which resulted in many streets with two sets of pipelines and customers connected randomly between the two companies. In the 1999 docket,⁶ Staff recommended opening a general investigation to investigate whether competition between [BHE] and KGS in the Wichita area had resulted in unsafe and uneconomic service to the public. In its memorandum recommending the investigation, Staff argued the following:

“No one would suggest that it is efficient, or desirable, to have a second electric distribution supplier run a second set of poles and distribution lines down every street for the benefit of competition. Similarly, it cannot be suggested that two sets of natural gas distribution facilities serving the same customers is beneficial to the public generally”.

ANALYSIS:

While the 1930s vintage certificates provided sufficient direction for distribution system growth 90 years ago, Staff believes population expansion in Sedgwick County will continue to cause territory disputes to occur as the two company's distribution systems approach each other. As noted earlier, designing a service territory based on a political boundary results in the unintended consequence of the Commission ceding its certification authority to a city annexation process.

As shown on Staff Exhibit 3, there are 41 communities with natural gas service in the five counties contained in the BHE certificate. Of those communities, BHE provides gas service to eight.

⁴ See consolidated Dockets 153,240-U, 154,990-U, and 155,339-U.

⁵ *Id.* Page 12, Order dated November 12, 1987.

⁶ See 99-KGSG-233-GIG.

However, BHE has a certificate to serve any customer outside the city limits of the remaining 33 communities. In our opinion, concentrated customer growth would naturally occur on the outskirts of cities and towns. The lack of a definitive boundary between the two service territories results in a classic seams issue where each utility is reluctant or unable to expand its infrastructure to potential customers desiring service in these locations. Staff contends that in order to prevent future territory disputes, it is good policy to allow the parties to present evidence to the Commission to develop a reasonable certification plan (including cessation of unserved territory) for the future development of gas service in the five affected counties. At the very least, the proposed certification plan should develop a definitive service territory in a buffer zone around the cities listed in Exhibit 3 that currently have natural gas service.

With respect to the current dispute, Staff understands a residential housing developer is in the final stages of preparing a subdivision site in the SW/4 of Section 21, Township 27S, Range 2W. While this property was at least one mile outside of Goddard when the 1960s dockets last modified the affected service territories, it was annexed into the city limits in 2009.⁷ Although Staff has not yet found the original certificate the Commission issued to KGS that allowed it to serve Goddard, we believe it to allow KGS to serve within the city limits boundaries. On the other hand, the application that BHE requested from the Commission (that was approved by the Commission) specifically states that BHE wishes to only serve customers outside the city boundaries of all cities in the five county area with exception of the few cities listed in the application.

Given these facts, Staff also notes BHE has been aware of the annexation for at least 15 years, and only now brings this matter to the attention of the Commission as the builder is ready to start construction.

RECOMMENDATION:

Staff recommends the Commission open a General Investigation into updating the COCs issued to KGS and BHE in Cowley, Sedgwick, Sumner, Reno, and Rice Counties. The Investigation should focus on developing metes and bounds descriptions for the certificate seams (as opposed to allowing the boundaries to follow expansion of the city limits) between BHE and the 33 communities that have natural gas service from a different provider in the listed counties. Staff recommends the proposed certification plan also consider existing infrastructure and the capability of the utility to provide service in a buffer zone around the cities that currently have natural gas service.

With respect to the above described subdivision, Staff recommends the Commission certificate KGS to provide service based on the existing COCs that allow KGS to provide service within the city limits of Goddard.

⁷ Phone conversation with City of Goddard personnel.

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the matter of the application of Arkansas Louisiana Gas Company for approval of a merger and for a Certificate of Convenience and Authority to transact the business of a natural gas public utility in Cowley, Sedgwick, Sumner, Reno and Rice Counties, Kansas; for approval of the transfer of certain franchises; and for permission to file certain rates, rules and regulations.

DOCKET NO.
62,953-U

CERTIFICATE AND ORDER

Now on this 30th day of March, 1960, there comes on for consideration and determination by the State Corporation Commission (Harry G. Wiles, Chairman, Marion Beatty and Richard C. Byrd, Commissioners) the application of Arkansas Louisiana Gas Company for a Certificate of Convenience and Authority in Cowley, Sedgwick, Sumner, Reno and Rice Counties, Kansas and for permission to file certain rates, rules and regulations, and after giving due consideration to the application and being fully advised in the premises, the Commission finds:

1. That Arkansas Louisiana Gas Company (Applicant) is a public utility under the provisions of 66-104, G. S. 1959, Supp.
2. That the application herein was filed on the 17th day of March, 1960, and after proper notice to all interested parties, a public hearing was held on March 28, 1960, in the Commission's Hearing Room, State Office Building, Topeka, Kansas.
3. That Applicant requests a Certificate of Convenience and Authority to transact the business of a gas public utility, including wholesale and retail sales of gas to domestic, commercial, industrial and other classes of customers, in all of Cowley, Sedgwick, Sumner, Reno and Rice Counties, Kansas, except Sections 5 and 6, T18S, R10W, Rice County, Kansas; provided that Applicant shall not be authorized to transact such business other than the wholesale sale of gas within the city limits of any incorporated city in said counties, except in the following incorporated cities:

Andale, Colwich, Gueda Springs, Hutchinson (commercial and industrial), Lyons, Maize, Nickerson, South Hutchinson (specifically for the Morton Salt Company plant and associated facilities which are located centrally in the NW 1/4 Section 23, T23S, R6W, Reno County, Kansas, within the city limits of South Hutchinson), Sterling and Wichita.

4. That the above-described territory is now being served by Consolidated Gas Utilities Corporation (Consolidated), which company has entered into a Merger Agreement with Applicant whereby the separate existence of Consolidated will cease and Applicant will succeed to all the rights, privileges, powers and immunities, and it will be subject to all duties, liabilities, obligations and disabilities, and will be vested with title to all property of Consolidated.

5. That Consolidated is the original grantee and present owner and holder of certain franchises in the Cities of Andale, Colwich, Hutchinson, Maize, Nickerson, South Hutchinson, Sterling, and Wichita, Kansas. Consolidated is likewise the owner of gas distribution systems and other facilities in said cities, and other gas utility property in the State of Kansas. Applicant proposes to become the successor to all of Consolidated's rights and obligations with respect to all of said franchises and properties.

6. As successor to Consolidated, Applicant proposes to assume and pay any lawful obligation of Consolidated for future refunding of certain increased rates collected under bond pursuant to Orders of this Commission in Docket Nos. 48,041-U, 60,827-U and 61,760-U.

7. That Applicant proposes to refile in its own name all gas tariffs, rules and regulations, contracts and other instruments of Consolidated filed with this Commission.

8. That public convenience will be promoted by permitting

Applicant to sell and distribute natural gas as described above. Therefore, the application should be granted with provisions and Applicant (1) should be issued a Certificate of Convenience and Authority to transact the business of a gas public utility as hereinbefore described and set forth in Finding #3, and (2) should be permitted and ordered to assume all the franchises, rights, privileges and powers and to assume all the duties, liabilities and obligations of Consolidated, subject to the provision that the Certificate of Convenience and Authority shall not become effective until Applicant has filed with the Commission journal entries reflecting the completion of the above-mentioned merger and has refiled in its own name all gas tariffs, rules and regulations, contracts and other instruments of Consolidated filed with this Commission.

9. That Applicant should be further required and ordered to assume and to pay any and all lawful obligations with respect to the future refunding of certain increased rates collected under bond as described in Finding #6.

10. That Consolidated is, this date, in Docket No. 62,951-U, being permitted to cease operating as a gas public utility in the State of Kansas, effective on the date the Certificate of Convenience and Authority to Applicant becomes effective.

IT IS, THEREFORE, BY THE COMMISSION CONSIDERED AND CERTIFIED:

That the application in the instant docket be, and the same hereby is, granted with provisions, and that Arkansas Louisiana Gas Company be, and it hereby is, permitted to transact the business of a gas public utility in the territory and to the extent hereinbefore described, subject to compliance with the provisions set forth in Finding #8 above.

IT IS, THEREFORE, BY THE COMMISSION ORDERED:

That Arkansas Louisiana Gas Company be, and it hereby is, permitted and ordered to assume all the franchises, rights, privileges and powers and to assume all the duties, liabilities and obligations of Consolidated Gas Utilities Corporation on and after the date the merger is consummated and the Certificate of Convenience and Authority becomes effective.

IT IS FURTHER BY THE COMMISSION ORDERED:

That on and after the effective date of the Certificate of Convenience and Authority, Arkansas Louisiana Gas Company be, and it hereby is, required and ordered to assume and to pay any and all lawful obligations with respect to the refunding of certain increased rates collected under bond as described in Finding #6.

The Commission retains jurisdiction of the subject matter and of the parties for the purpose of entering such further order or orders as it may deem necessary.

BY THE COMMISSION IT IS SO CERTIFIED AND ORDERED.

Wiles, Chm.; Beatty, Com.; Byrd, Com.

RAYMOND B. HARVEY, SECRETARY

SEAL

EXHIBIT 2

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of)
The Gas Service Company for a)
Certificate of Convenience and)
Authority to Transact the Business)
of a Natural Gas Public Utility in)
a Described Area in Sedgwick)
County, Kansas)

DOCKET NO. _____

FILED IN DOCKET NO. 64-186

DATE FILED 75015-0

By R. S. Harvey Secretary

APPLICATION FOR CERTIFICATE

Comes now THE GAS SERVICE COMPANY, a Delaware corporation authorized to transact business in the State of Kansas, and represents and shows to the Commission:

1. That Applicant is engaged in the distribution of natural gas at retail in the State of Kansas and elsewhere.

2. That by its Order in Docket No. 64, 714-U this Commission granted to The Gas Service Company a certificate of convenience and authority to provide natural gas service to the inhabitants of the City of Goddard and in a corridor along its supply line, described as follows:

SEDGWICK COUNTY

T27S, R2W, A corridor 500 feet wide, extending 250 feet on the north and south sides of the section lines dividing Sections 26, 27, 28, 29 and 30 from Sections 31, 32, 33, 34 and 35 and extending westward from Applicant's present service area as far as Applicant's transmission line is constructed to a point north of Goddard and including 250 feet on each side of the gas transmission line as it extends southward from this line to the City of Goddard.

3. That the area for which a certificate was granted by this Commission in Docket No. 64, 714-U is indicated in green upon the map attached hereto and marked "Exhibit A".

4. That in accordance with the Commission's Order hereinabove referred to The Gas Service Company has constructed a supply line and distribution system to serve the City of Goddard and customers along the corridor hereinabove described.

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64-186

5. That recently Applicant has received requests for natural gas service from potential customers located in close proximity to but beyond the boundaries of the certificated area authorized by the Commission in Docket No. 64,714-U.

6. That in order to supply natural gas service to said potential customers Applicant hereby applies for a certificate of convenience and authority authorizing Applicant to provide natural gas service in the area described as follows:

All of Sections 26, 27, 28, 29, 30, 31, 32, 33, 34 and 35, Range 2 W, Twp. 27 S in Sedgwick County, Kansas, except the City of Goddard, Kansas and a corridor 500 feet wide extending 250 feet on the north and south sides of the section line dividing Sections 26, 27, 28, 29, 30, 31, 32, 33, 34 and 35, Range 2 W, Twp. 27 S.

7. That the area described in Paragraph 6 hereof is shown in red on Exhibit A attached hereto.

8. That it is in the public interest that Applicant be authorized to provide service within the area described in Paragraph 6 hereof.

9. Subject to the approval of the Commission Applicant proposes to place in effect for the area for which a certificate is sought herein a schedule or schedules of rates which may from time to time be effective for service to the City of Goddard.

WHEREFORE, Applicant requests an Order of the Commission as follows:

1. Issuing to Applicant a certificate of convenience and authority granting the right to transact the business of a natural gas public utility in the area described in Paragraph 6 hereof and indicated in red upon the map attached hereto and marked "Exhibit A".

2. Authorizing Applicant to file and place in effect for said area the schedule or schedules of rates which may from time to time be effective for service within the City of Goddard, Kansas.

THE GAS SERVICE COMPANY

By 
President

File No.

64-186

STATE OF MISSOURI)
) SS.
COUNTY OF JACKSON)

I. W. McKEE, of lawful age, being first duly sworn, deposes and says that he is President of the within named applicant; that he has read the above and foregoing application; and that the statements therein contained are true.

I. W. McKee

*Subscribed and sworn to before me this 22nd day of
October, 1964.*

Paul C. Beaumont

My commission expires March 17, 1966.

Notary Public
In and for City County, State of Missouri, a
county adjoining Jackson County, Missouri

JERRY T. DUGGAN
Kansas City, Missouri

RICHARD C. BYRD
Ottawa, Kansas

KIRKE W. DALE
Arkansas City, Kansas

Attorneys for Applicant

File No.

64-186

Exhibit 3
Communities Located in Counties Certificated to Black Hills Energy

TOWNS	COUNTY	GAS	SUPPLIER
Arkansas City	Cowley	KGS	SS
Atlanta	Cowley	KGS	SS
Burden	Cowley	KGS	SS
Cambridge	Cowley	KGS	SS
Dexter	Cowley	KGS	SS
Rock*	Cowley		
Udall	Cowley	KGS	SS
Winfield	Cowley	MUN	OneOK
Abbeyville	Reno	MUN	SS
Arlington	Reno	KGS	PEPL
Buhler	Reno	KGS	
Haven	Reno	KGS	SS
Hutchinson	Reno	KGS,BHE&MWE	SS
Langdon	Reno	KGS	PEPL
Nickerson	Reno	BHE	
Partridge	Reno	MUN	SS
Plevna	Reno	BHE	SS
Pretty Prairie	Reno	KGS	
So. Hutchinson	Reno	KGS&BHE	SS
Sylvia	Reno	MUN	SS
Turon	Reno	KGS	PEPL
Willowbrook	Reno	BHE	NNG
Alden	Rice	KGS	SS
Bushton	Rice	KGS	NNG
Chase	Rice	KGS	SS
Frederick	Rice	KGS	SS
Geneseo	Rice	KGS	SS
Little River	Rice	MUN	BHE
Lyons	Rice	MUN	BHE
Raymond	Rice	KGS	SS
Sterling	Rice	BHE	
Andale	Sedgwick	BHE	
BelAire	Sedgwick	KGS	SS
Bentley	Sedgwick	KGS	SS
Cheney	Sedgwick	MUN	OneOK
Clearwater	Sedgwick	KGS	SS
Colwich	Sedgwick	BHE	
Derby	Sedgwick	KGS	SS
Eastborough	Sedgwick	KGS	SS
Garden Plain	Sedgwick	MUN	MCMC
Goddard	Sedgwick	KGS	KGS
Haysville	Sedgwick	KGS	SS

Jackson*	Sedgwick		
Kechi	Sedgwick	MUN	SS
Maize	Sedgwick	BHE	
Mount Hope	Sedgwick	KGS	SS
Park City	Sedgwick	KGS	SS
Parkview*	Sedgwick		
Peck*	Sedgwick	BHE	
Valley Center	Sedgwick	KGS	SS
Viola	Sedgwick	BHE	SS
Wichita	Sedgwick	KGS&BHE	SS
	Sedgwick-		
Mulvane	Sumner	KGS	SS
Argonia	Sumner	MUN	SS
Belle Plaine	Sumner	KGS	SS
Caldwell	Sumner	Atmos	BHE
Conway Springs	Sumner	KGS	SS
Corbin*	Sumner		
Hunnewell	Sumner	Atmos	PEPL
Mayfield	Sumner		
Milan	Sumner		
Oxford	Sumner	KGS	SS
Riverdale*	Sumner		
South Haven	Sumner	Atmos	BHE
Wellington	Sumner	KGS	SS
Geuda Springs	Sumner-Cowley	BHE	

CERTIFICATE OF SERVICE

25-GIMG-114-GIG

I, the undersigned, certify that a true and correct copy of the above and foregoing Notice of Filing was served via electronic service this 12th day of August, 2024, to the following:

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