

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

PETITION FOR INTERVENTION OF THE KANSAS MUNICIPAL GAS AGENCY

Pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, the Kansas Municipal Gas Agency (KMGA) hereby petitions the State Corporation Commission of the State of Kansas (Commission) for an order granting KMGA's intervention in the above-captioned matter. In support thereof, KMGA states the following:

1. KMGA is a quasi-municipal corporation duly organized under the laws of the State of Kansas,¹ with its principal place of business at 6300 West 95th Street, Overland Park, Kansas 66212. KMGA is authorized to do business and is conducting business in the State of Kansas on behalf of its 51 municipal members. It is authorized by law to exercise its functional powers relating to, in relevant part, the provisioning of natural gas supplies for its member cities, and provides related transportation, storage, and balancing services for those supplies.²

2. On March 31, 2023, Kansas Gas Service, a Division of ONE Gas, Inc., (KGS) filed an application seeking to revise certain tariffs controlling its Transportation services. KMGA, on

¹ K.S.A. 12-2901 et seq.

² KMGA has no employees of its own. Rather, pursuant to K.S.A. 12-2901 et seq., and by virtue of an *Interlocal Cooperation Agreement*, the Kansas Municipal Energy Agency (KMEA) provides management and administrative services to KMGA. All employees providing services to KMGA are employees of KMEA. KMEA is a municipal joint action energy agency duly organized pursuant to K.S.A. 12-885 et. seq.

behalf of its member cities, operates as a “transportation customer” on the KGS systems and takes service under the referenced tariffs.

3. K.S.A. 77-521 provides, in part, that petitions for intervention shall be granted if “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 or that the petitioner qualifies as an intervener under any provision of law... and... 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.” Further, the Commission has discretion to allow 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.”³

4. KMGA 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. Further, KMGA’s interests herein are not adequately represented by any other party to this proceeding.

5. KMGA notes that no procedural schedule has yet been set in this matter and posits that its intervention will not disrupt or impair the orderly and prompt conduct of the proceedings. Moreover, KMGA’s intervention is in the interests of justice because of its membership, fourteen of its cities take service off the KGS systems, and as such, their respective interests may be affected by this proceeding.

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

³ K.S.A. 77.521(b).

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WHEREFORE, KMGA respectfully requests the Commission issue an order granting KMGA intervention in this proceeding, and for any and all other such relief the Commission deems just and proper.

Respectfully Submitted,

/s/ Terri Pemberton

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing *Petition of Intervention of Kansas Municipal Gas Agency* was electronically served on this 6th day of April 2023, to the following named persons appearing on the Commission’s service list last modified on April 3, 2023:

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