

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Golden Gas)
Service Company for a Certificate of)
Convenience and Necessity to Operate an)
Intrastate Natural Gas Storage and Pipeline)
Facility in Kiowa County, Kansas and for)
Approval of Initial Terms and Conditions for)
Services and Rates.)

Docket No. 25-GGSG-459-COC

PETITION TO INTERVENE

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and petitions the Corporation Commission of the State of the Kansas ("Commission") for intervention in the above-captioned case pursuant to K.S.A. 66-1223 and K.S.A. 77-521(a). In support of its petition, CURB states and alleges as follows:

1. On June 3, 2025, Golden Gas Service Company ("GGSC") filed an application with the Kansas Corporation Commission for approval of a certificate of convenience and necessity to operate an intrastate natural gas storage and pipeline facility in Kiowa County, Kansas and for approval of initial terms and conditions for services and rates.

2. CURB is composed of five volunteer board members.¹

3. CURB has specific statutory authority to "represent residential and small commercial ratepayers before the state corporation commission"² and to "function as an *official intervenor in cases* filed with the state corporation commission."³ CURB's authority and role as the official intervenor in cases filed with the Commission has been recognized by the Kansas Supreme Court.⁴

¹ K.S.A. 66-1222(a).

² K.S.A. 66-1223(a).

³ K.S.A. 66-1223(b).

⁴ K.S.A. 66-1223(b). See, *Citizens' Utility Ratepayer Board v. Kansas Corporation Comm'n*, 24 Kan. App.2d 63, 68, rev. den. 262 Kan. 959 (1997) ("*CURB v. KCC*"). See also, *Farmland Industries, Inc. v. Kansas Corp. Comm'n*, 29 Kan.App.2d 1031, 1047-48, 37 P.3d 640 (2001) ("The bulk of current customers otherwise entitled to receive refunds are *statutorily represented* by CURB. See K.S.A. 66-1223(a)")

CURB also has specific statutory authority to seek judicial review of Commission orders and decisions on behalf of residential and small commercial ratepayers.⁵

4. CURB's express statutory authority referenced above reflects the intent of the Legislature that CURB should participate in cases filed with the Commission. This fulfills the requirement under K.S.A. 77-521(a)(2) because CURB "qualifies as an intervener under any provision of law."

5. The residential and small commercial ratepayers whose interests CURB represents will be bound by any Commission order or activity in this proceeding. The rates paid and the services received by residential and small commercial ratepayers may be substantially affected by any Commission order or activity in this proceeding with respect to GGSC's proposed certificate of convenience and necessity to operate an intrastate natural gas storage and pipeline facility in Kiowa County, Kansas and for approval of initial terms and conditions for services and rates, as described in its application.

6. The representation of CURB's interests in this proceeding by existing parties is inadequate. No other party to this proceeding is authorized to (a) specifically represent residential and small commercial ratepayers before the Commission, (b) function as the statutory official intervenor in cases filed with the Commission, or (c) seek judicial review of Commission orders and decisions on behalf of residential and small commercial ratepayers. While Commission Staff may have authority to investigate, evaluate, testify and offer exhibits on behalf of the *general public* pursuant to a definition contained in a Commission regulation,⁶ Staff does not specifically represent

⁵ K.S.A. 66-1223.

⁶ Staff's authority to represent the general public is not specifically authorized by statute, but merely referenced in the definition section of Commission regulations. K.A.R. 82-1-204(q) ("Technical staff may conduct investigations and otherwise evaluate issues raised, and may testify and offer exhibits on behalf of the *general public*.") (emphasis added).

residential and small commercial ratepayers and is expressly denied the right to appeal Commission orders.⁷

7. Accordingly, CURB has a substantial and vital interest in the outcome of this proceeding which cannot be adequately represented by any other party. Pursuant to K.S.A. 77-521(a)(2), CURB qualifies as an intervenor (a) under provision of law and (b) because the rights, duties, privileges, immunities, or other legal interests of residential and small commercial ratepayers may be substantially affected by this proceeding.⁸

8. CURB's requested intervention is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.⁹

9. CURB therefore requests that the Commission grant CURB's Petition to Intervene and allow CURB to participate fully in this docket, including but not limited to the right to conduct discovery, file pleadings and testimony, present oral argument, and fully participate in any scheduled hearings.

10. In addition to undersigned counsel, please include the following CURB representatives with all electronic notices, pleadings, and correspondence regarding this Application as follows:

Shonda Rabb
Public Service Administrator
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
Email: shonda.rabb@ks.gov

Della Smith
Senior Administrative Specialist
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
Email: della.smith@ks.gov

⁷ K.A.R. 82-1-204(i)(3).

⁸ K.S.A. 77-521(a)(2).

⁹ K.S.A. 77-521(a)(3).

WHEREFORE, CURB respectfully requests the Commission grant its Petition for Intervention in this Docket.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Joseph R. Astrab', with a long horizontal flourish extending to the right.

Joseph R. Astrab, Consumer Counsel #26414

Todd E. Love, Attorney #13445

John I. Racy, Attorney #30750

Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

Topeka, KS 66604

(785) 271-3200

Joseph.Astrab@ks.gov

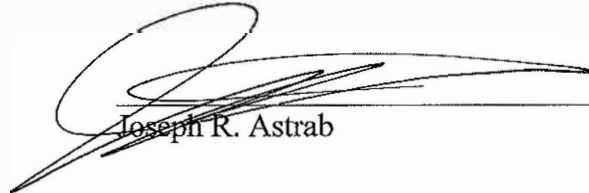
Todd.Love@ks.gov

John.I.Racy@ks.gov

VERIFICATION

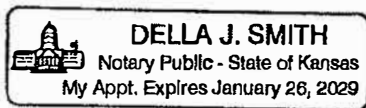
STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

I, Joseph R. Astrab, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.



Joseph R. Astrab

SUBSCRIBED AND SWORN to before me this 13th day of October, 2025.





Notary Public

My Commission expires: 01-26-2029.

CERTIFICATE OF SERVICE

25-GGSG-459-COC

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 13th day of October, 2025, to the following:

JAMES G. FLAHERTY, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067-0017
jflaherty@andersonbyrd.com

CATHRYN J. DINGES, SR DIRECTOR &
REGULATORY AFFAIRS COUNSEL
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
Cathy.Dinges@evergy.com

J. P. MEITNER, DIRECTOR,
MARKETING OPERATIONS
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
James.Meitner@evergy.com

LESLIE WINES, Sr. Exec. Admin. Asst.
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
leslie.wines@evergy.com

ALAN R. STAAB, President
Golden Gas Service Company
2502 East 21st Street
Suite B
Tulsa, OK 74114
astaab@ggsctulsa.com

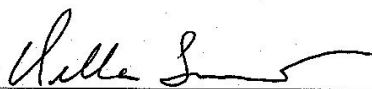
PATRICK HURLEY, CHIEF
LITIGATION COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Patrick.Hurley@ks.gov

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

LORNA EATON, MANAGER OF RATES
AND REGULATORY AFFAIRS
KANSAS GAS SERVICE, A DIVISION
OF ONE GAS, INC.
7421 W 129TH STREET
OVERLAND PARK, KS 66213
lorna.eaton@onegas.com

STEPHANIE FLEMING, LEGAL
ASSISTANT
KANSAS GAS SERVICE, A DIVISION
OF ONE GAS, INC.
7421 W 129TH STREET
OVERLAND PARK, KS 66213
stephanie.fleming@onegas.com

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


Della Smith
Senior Administrative Specialist