

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

In the Matter of the General Investigation)
Into the Operations of Kansas Gas Service) Docket No. 17-KGSG-069-GIP
Inc., a Division of ONE Gas, Regarding the)
Natural Gas Incident that Occurred at 918)
West 5th Street, Newton, Kansas.)

STAFF'S RESPONSE TO KANSAS GAS SERVICE'S MOTION TO SUPPLEMENT

The Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively), by and through counsel, Phoenix Z. Anshutz, hereby files its Response to Kanas Gas Service's (KGS) Motion to Supplement its Response to Staff's Report and Recommendation. Staff states as follows:

I. BACKGROUND

1. On June 2, 2016, a natural gas fire occurred in an open trench during a construction operation at 918 West 5th Street, Newton, Kansas. The fire injured a contract employee of KGS who was working on the piping at that time. The injury suffered by the contract employee required hospitalization.

2. On November 9, 2017, Staff filed its Report and Recommendation which asserted that actions not taken by KGS employees leading up to the natural gas incident resulted in violations of Kansas Pipeline Safety Regulations.

3. On January 19, 2018, KGS filed its Response to Staff's Report and Recommendation. The Response included documentation of KGS' corrective efforts attached to the filing as "Attachment A". Attachment A contained two documents labeled "Phase I" and "Phase II". At the time of the filing, the tasks referenced in Phase I had been completed. However, the tasks referenced in Phase II had not yet been completed.

4. Since the filing of KGS' initial response, the tasks set forth in Phase II have been completed.

5. On May 1, 2018, KGS filed a *Motion to Supplement its [KGS] Response to Staff's Report and Recommendation*. In the Motion, KGS states that "because the corrective efforts documented in the proposed supplemental document evidence the Company's focus on safety and its efforts to address Staff's concerns, the Company now seeks to supplement its Response to Staff's Report and Recommendation with the document attached hereto as "Attachment A- Phase II – Updated".

II. DISCUSSION

7. Staff has reviewed the Motion of Kansas Gas Service and believes good cause exists to grant the same. The attachment to the Motion adds clarity and extensiveness to the record.

WHEREFORE, Staff respectfully requests the Commission accept Kansas Gas Service's Motion to Supplement.

Respectfully Submitted

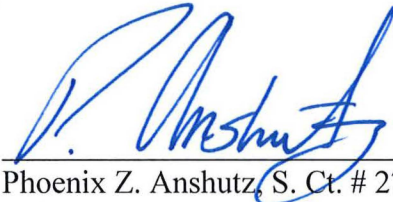


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VERIFICATION

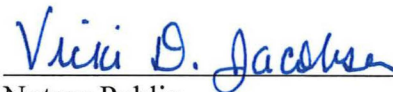
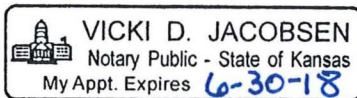
STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

Phoenix Z. Anshutz, of lawful age, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing *Staff's Response to Kansas Gas Service's Motion to Supplement*, and attests that the statements therein are true and correct to the best of his knowledge, information and belief.



Phoenix Z. Anshutz, S. Ct. # 27617
Litigation Counsel
The State Corporation Commission
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 8th day of May, 2018.



Notary Public

My Appointment Expires: June 30, 2018

CERTIFICATE OF SERVICE

17-KGSG-069-GIP

I, the undersigned, certify that a true and correct copy of the above and foregoing Staff's Response to Kansas Gas Service's Motion to Supplement was served via electronic service this 8th day of May, 2018, to the following:

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