

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

In the Matter of the Application of Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy, for Approval of the Commission to Make Certain Changes in its Rates for Natural Gas Service)
)
) **Docket No. 25-BHCG-298-RTS**
)
)

PETITION TO INTERVENE OF FREEDOM PIPELINE, LLC

COMES NOW Freedom Pipeline, LLC (“Freedom Pipeline”) and pursuant to K.A.R. 82-1-225 petitions the State Corporation Commission of the State of Kansas (“Commission”) for intervention in the above-captioned proceeding. In support of its petition to intervene, Freedom Pipeline states as follows:

1. Freedom Pipeline is a Kansas limited liability company, organized and developed to own and operate an intrastate natural gas delivery system. Freedom Pipeline is owned by and delivers natural gas to six Kansas non-profit utilities. The six member-owners of Freedom Pipeline are: SWKI Stevens North, Inc.; SWKI Spikes North, Inc.; SWKI Stevens Southeast, Inc.; SWKI Seward West Central, Inc.; SWKI Stevens HSW, Inc. (collectively, the “NPU’s”).

2. Freedom Pipeline holds a certificate of convenience and necessity authorizing it to provide natural gas service in Stevens, Grant and Seward Counties, Kansas, issued by the Commission on August 4, 2015, in Docket No. 14-FRPG-599-COC.

3. On February 3, 2025, Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy (“Black Hills”), filed an application for a general rate increase in its rates charged for natural gas.

4. K.A.R. 82-1-225 provides that a petition for intervention shall be granted if three conditions are met: (1) the petition is submitted in writing and provided to parties at least three days before 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 or that the petitioner qualifies as an intervener under any provision of law; and (3) the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

5. Freedom Pipeline is a natural gas transport customer of Black Hills whose legal interests may be substantially affected by the decisions of the Commission in this docket. In the interest of justice, and because Freedom Pipeline's interests will be substantially affected by this proceeding and are not adequately represented by any other party, granting intervention to Freedom Pipeline is proper.

6. The orderly and prompt conduct of these proceedings will not be impaired by allowing Freedom Pipeline's intervention. No prejudice will be suffered by Black Hills or any other party if intervention is granted. Freedom Pipeline agrees to accept electronic service of all pleadings, orders, and other documents in this proceeding as required by K.A.R. 82-1-216(a)(6) at the email addresses indicated for each individual and counsel listed below.

7. In addition to signatory counsel, the following individuals should be added to the Commission's service list for this docket:

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WHEREFORE, Freedom Pipeline requests the right to participate in all aspects of this case without limitation so that it may receive notice of all pleadings and orders, conduct discovery, present and cross-examine witnesses, be heard on the arguments, and in all other respects fully participate in this proceeding.

Respectfully submitted,

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STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

VERIFICATION

I, Will B. Wohlford, verify under penalty of perjury that I have caused the foregoing pleading to be prepared; that I have read and reviewed the same; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

/s/ Will B. Wohlford

CERTIFICATE OF SERVICE

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I hereby certify that a copy of the above and foregoing was electronically filed with the Kansas Corporation Commission on April 24, 2025, and that one copy was delivered electronically to all parties on the service list as follows:

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