

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

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

REPLY COMMENTS OF KANSAS GAS SERVICE
ON METES AND BOUNDS DESCRIPTIONS AND BUFFER ZONES
FOR THIRTY-THREE COMMUNITIES IN FIVE KANSAS COUNTIES

Kansas Gas Service, a division of ONE Gas, Inc., (“Kansas Gas Service”), respectfully submits its Reply Comments on developing clear metes and bounds descriptions for certificate seams between Kansas Gas Service and Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills Energy (“Black Hills”), and other natural gas public utilities operating in Cowley, Sedgwick, Sumner, Reno, and Rice Counties. In support thereof, Kansas Gas Service states the following to the State Corporation Commission of the State of Kansas (“Commission”):

Kansas Gas Service commends the Commission for working to modernize the certificated service territory of natural gas public utilities serving south central Kansas. As Kansas’ largest natural gas public utility serving more than 648,000 customers in over 360 communities, Kansas Gas Service appreciates the need for this investigation. The public interest is promoted and communities benefit when one utility serves an area. Not only does this support the safe and orderly development of utility infrastructure, but it also reduces opportunities for duplicative facilities and disputes between utilities. To aid the Commission, Kansas Gas Service respectfully submits a certification plan that: (1) addresses the Commission’s comment scope, (2) integrates key elements from prior Commission dual certification dockets, (3) is supported by Kansas law, and (4) has the potential to further develop rural access to natural gas.

I. KANSAS GAS SERVICE'S CERTIFICATION PLAN

1. The Commission requested parties submit a certification plan focused on:
 - a. developing clear metes and bounds descriptions of the certificate [seams] between Black Hills and the other thirty-three (33) communities that have natural gas service from a different provider in Cowley, Sedgwick, Sumner, Reno, and Rice Counties; and
 - b. the possibility of a buffer zone around the cities that currently have natural gas service.¹
2. Kansas Gas Service respectfully requests the Commission adopt its plan that:
 - a. designates Kansas Gas Service as the exclusive natural gas public utility in Cowley, Sedgwick, Sumner, Reno, and Rice Counties, as detailed in **Exhibit 1**, attached hereto and incorporated by reference;
 - b. maintains the Amended Joint Recommendation for exclusive territories in Wichita's city limits approved by the Commission in Docket No. 99-KGSG-233-GIG ("99-233 Docket"); and
 - c. integrates the general principles from the 99-233 Docket into service areas in Cowley, Sedgwick, Sumner, Reno, and Rice Counties.

3. K.S.A. 66-131 and Kansas case law articulate the legal standard for reviewing certificates of convenience and necessity, which is whether the public convenience and necessity will be promoted by allowing a utility to transact business in a specific area. The Commission should apply this legal standard when reviewing any certification plan because this docket focuses on adjusting certificates of convenience and necessity. As part of this analysis, Kansas Courts have developed factors to evaluate and interests to weigh. The certificate boundaries in **Exhibit 1** meet this standard by using exclusive service territories to prevent ruinous competition and the unnecessary duplication of facilities, bringing clarity which itself helps promote adequate and efficient service. Kansas Gas Service's plan appropriately places the most emphasis on promoting public convenience and sets the stage for the potential expansion of natural gas in rural Kansas.

¹ Order Opening General Investigation and Setting Comment Deadlines, Ordering Clause (A)(2) (Oct. 22, 2024).

A. Kansas Gas Service's Certification Plan Addresses the Commission's Scope

4. Kansas Gas Service's certification plan in **Exhibit 1** establishes exclusive certificated service territories using section, township, range descriptions. This plan has three clear advantages. First, it directly responds to the scope of this investigation. Second, it preserves the intent of the Commission's prior certificates. Third, it incorporates prior modernization efforts.

i. Clear Metes and Bounds of Certificate Seams Directly Address Investigation's Scope

5. As the Commission recognized, century-old certificates granted service territory using generic political boundaries (i.e., the name of a city or county).² As communities have grown over the past century, there is now a degree of ambiguity in which utility serves some areas. Kansas Gas Service's plan resolves this ambiguity by modernizing legacy certificates to reflect the section, township, range descriptions that cover all the communities identified in this docket. Section, township, range boundaries are used today by the Commission to adjust service territory seams and provide all the clarity needed to resolve the dual certification issues presented in this docket.

ii. Buffer Zones Preserve the Intent of Prior Orders

6. While legacy certificates used generic political boundaries, the Commission recognized utility service would be needed outside of these borders. For instance, Kansas Gas Service's legacy certificate issued on November 15, 1935, in Docket No. 16,177 authorized Kansas Gas Service to serve "in the vicinities of" over 100 Kansas cities, towns, and communities.³ Black Hills' legacy certificate issued on November 27, 1935, in Docket No. 16,167 did the same for five cities. While "the vicinities of" was never defined, the Commission recognized those residing outside of a community's political boundaries would need access to utilities and authorized Kansas' public utilities to provide that service. The buffer zones in **Exhibit 1** preserves this goal.

² See *id.* at ¶ 2.

³ Certificate, Docket No. 16,177, ¶ 1 (Nov. 15, 1935) (emphasis added).

iii. Prior Efforts to Update Legacy Certificates

7. Kansas Gas Service has previously updated some of its legacy certificates to integrate section, township, range boundaries. Kansas Gas Service reviewed the communities it serves in Cowley, Sedgwick, Sumner, Reno, and Rice Counties to see if certificated territory had been updated after 1935. On several occasions, Kansas Gas Service sought and received approval to revise its legacy certificate with section, township, range descriptions.⁴ Kansas Gas Service's revision to its certificate for Arkansas City stated it was "desirable to define the territory actually served and provide for growth by accurate legal description."⁵ Kansas Gas Service's plan in **Exhibit 1** furthers this effort. While certificates for some communities have integrated section, township, range descriptions, others have not. Consider Derby in Sedgwick County. Kansas Gas Service's certificate issued in 1935 authorized service in, and in the vicinity of, Derby. However, certificated boundaries do not capture Derby's growth. **Exhibit 2**, attached hereto and adopted by reference, shows the municipal corporate boundaries of communities Kansas Gas Service provides service to in Cowley, Sedgwick, Sumner, Reno, and Rice Counties, along with its certified service territory as it exist today. A portion of Derby's city limits, which Kansas Gas Service serves and has facilities in, falls outside its certificate. While this is acceptable given Kansas Gas Service's 1935 certificate, it demonstrates the need to modernize utility certificates to "define the territory actually served and provide for growth." As the Commission reviews certificated utility service territory, one additional aspect should be the development of continuous service territory and maintaining consistent service providers between nearby communities.

⁴ See, e.g., Docket Nos. 65-962-U (Alden); 67,993-U (Raymond); 86,847-U (Wellington, Belle Plaine, Oxford, Conway Springs); 167-620-U (Arkansas City); 89-418-U (Joint Application between utilities clarifying service territory in Reno County, Kansas).

⁵ Application for Certificate, Docket No. 167,620-U, ¶ 2 (July 27, 1989).

iv. Continuous Service Territory

8. It would be unreasonable to recertify service territory based on city limits in a way that inadvertently cuts off existing utility service to, or the ability to serve future customers, located nearby but outside of city limits as they exist today. Buffer zones extending utility service territory beyond communities partially address this issue and captures the intent from the Commission's legacy certificates. However, a certification plan focused on areas in and around communities may inadvertently create inefficient certificated islands. One utility could be certified to serve two communities located near one-another, while a different utility is certified to serve the area in between. To reduce the likelihood of this inefficiency, Kansas Gas Service's plan works to create continuous service territories between the communities Kansas Gas Service already serves.

B. Kansas Gas Service's Plan Integrates Prior Certification Agreements

9. In the 99-233 Docket, the Commission investigated dual certification issues between Kansas Gas Service and Peoples Natural Gas Company, a division of Utilicorp United, Inc., ("Peoples"), now Black Hills, in the Wichita metro area. Briefly, the Commission recognized dual certification introduces safety concerns and inefficiencies. Ultimately, the Commission approved a certification plan reached between Kansas Gas Service and Peoples that created exclusive gas distribution service territories in the corporate limits of the City of Wichita as it existed then and was annexed in the future. Notably, the Amended Joint Recommendation:

- a. created exclusive service territories within the corporate limits of the City of Wichita as it existed, and as it may be annexed in the future, based on section, township, range descriptions;
- b. made clear all new services in the exclusive service territories could only be served by the exclusively certificated utility;
- c. allowed utilities to continue to serve their existing customers, even if they were located in the other utility's exclusive territory;

- d. clarified service extensions could only be made by the certified utility, except those which are mutually agreed to as exceptions and approved by the Commission (i.e., it would be possible for one utility to serve customers in another utility's territory provided mutual consent and regulatory approvals were received).

10. Because this agreement was critical to improving the safety and efficiency of natural gas service in Wichita's metro area, any certification plan must integrate the 99-233 Docket's Amended Joint Recommendation. Kansas Gas Service's certification plan integrates and restates the Amended Joint Recommendation approved by the Commission in the 99-233 Docket.

11. Kansas Gas Service believes the general principles in the 99-233 Docket's Amended Joint Recommendation should be integrated into any certification plan. The 99-233 Docket serves as a good benchmark for resolving today's certification issues in Cowley, Sedgwick, Sumner, Reno, and Rice Counties. It allows customers to maintain their current provider, makes clear who serves new customers and growth, and allows for service territory to be adjusted in the future if the public convenience is promoted. While any new services (i.e., new customers) would be served by the exclusively certificated utility, gas utilities should be able to continue to serve their current customers. Moreover, gas utilities and the Commission should be able to review service extensions and potentially swap service territory in the future if such a swap would promote the public convenience and necessity.

C. Kansas Gas Service's Certification Plan is Supported by Kansas Law

12. Kansas Gas Service's plan is supported by the text, context, and history of Kansas' certification statute. Kansas' certification statute, K.S.A. 66-131, provides the statutory legal standard the Commission applies in certificate dockets, which is whether public convenience and necessity will be promoted.⁶ Since the purpose of this docket is to develop new certificated

⁶ "No person or entity . . . or 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

territory and seams between natural gas public utilities then the same legal standard and principles apply.

13. In *Cent. Kansas Power Co. v. State Corp. Comm'n*, the Kansas Supreme Court summarized the legislative purpose behind certificates of convenience and necessity, and how the Commission should weigh competing interests when reviewing certificate requests:

The statutes authorizing the Commission to supervise and control corporate action in the utility field have been generally understood as an expression of the legislature's administrative policy designed to protect against ruinous competition, to promote adequate and efficient service and to limit the waste attendant on unnecessary duplication of facilities designed for the same purpose in the same area.⁷

* * *

In determining whether such certificate of convenience should be granted, (1) the public convenience ought to be the commission's primary concern, (2) the interest of public utility companies already serving the territory secondary, and (3) the desires and solicitations of the applicant a relatively minor consideration.⁸

14. "Public convenience means the convenience of the public, not the convenience of particular individuals."⁹ "Public necessity does not necessarily mean there must be a showing of absolute need. As used, the word 'necessity' means a public need without which the public is inconvenienced to the extent of being handicapped."¹⁰ A showing of absolute necessity is not required to support the granting of a certificate.¹¹ In fact, a "nebulous" showing is all that's

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." K.S.A 66-131(a); *See also Cent. Kansas Power Co. v. State Corp. Comm'n*, 206 Kan. 670, 676, 482 P.2d 1, 7 (1971) ("[A]n applicant for a certificate must show that public convenience and necessity will be promoted by authorization of the plan for the electric facilities envisioned in the application.").

⁷ *Cent. Kansas Power Co. v. State Corp. Comm'n*, 206 Kan. 670, 677, 482 P.2d 1, 7 (1971) (emphasis added); *See also Kansas Gas & Elec. Co., v. Pub. Serv. Comm'n of Kansas*, 122 Kan. 462, 251 P. 1097, 1099 (1927) (Unnecessary duplication and ruinous competition between utilities should be avoided by sensibly granting or withholding certificates of convenience and necessity).

⁸ *Id.*, quoting *Kansas Gas & Elec. Co., v. Pub. Serv. Comm'n of Kansas*, 122 Kan. 462, 251 P. 1097, 1099 (1927).

⁹ *Cent. Kansas Power Co. v. State Corp. Comm'n*, 206 Kan. 670, 676, 482 P.2d 1, 7 (1971).

¹⁰ *Id.*

¹¹ *See id.*

needed.¹² Public convenience and necessity are best demonstrated by the actual conditions in the area to be served, and the Commission has the authority to make its own determination based on that evidence.¹³

i. Kansas Gas Service's Plan Reasonably Applies Legislative Administrative Policy

15. Recognizing the regulation of public utilities is legislative in nature,¹⁴ Kansas Gas Service's plan sensibly promotes the public convenience and necessity. Exclusive and continuous service territories protect the public from ruinous competition. By designating specific territories where only one utility provider operates, Kansas Gas Service's plan allows each utility to maintain a stable customer base. Likewise, exclusive service territories allow for the predictable growth of infrastructure needed to deliver high-quality reliable service to customers. Utilities and communities' long-term planning processes benefit when they can establish relationships with their known service provider, and customers benefit from the simplicity of knowing to call one company. Emergency response officials benefit by having direct line-of-sight into which utility company is operating within their area of responsibility. Combined, the aspects of exclusive service territories promote the delivery of adequate and efficient service. As a final note, exclusive service territories help prevent the duplication of infrastructure, reducing costs and environmental impact, ultimately benefiting consumers with more consistent and affordable services. After all, duplicative services are "wasteful and a useless burden upon the community"¹⁵ and the Commission has the power needed to "put reasonable limitations to the evils attendant on

¹² See *General Communications System, Inc. v. State Corporation Commission*, 216 Kan. 410, 415 (1975).

¹³ *Cent. Kansas Power Co. v. State Corp. Comm'n*, 206 Kan. 670, 677, 482 P.2d 1, 7 (1971).

¹⁴ *Kansas Gas & Elec. Co. v. State Corp. Comm'n*, 239 Kan. 483, 491, 720 P.2d 1063, 1072 (1986).

¹⁵ *Kansas Gas & Elec. Co. v. Pub. Serv. Comm'n*, 124 Kan. 690, 261 P. 592, 596 (1927).

unnecessary duplication of public utilities.”¹⁶ That power is best exercised with exclusive and continuous service territories which Kansas Gas Service’s plan puts forward.

ii. Appropriate Weighing of Competing Interests

16. At its most fundamental level, utility regulation is an exercise of the state’s police power necessary for the protection of the public safety and welfare.¹⁷ “The discretionary power of the Commission to grant or withhold certificates of convenience to public utility companies is broader than its power to govern rates and services of such companies.”¹⁸ When determining whether a certificate of convenience should be granted to any particular utility, the Commission weighs competing interests. Kansas Gas Service’s plan appropriately weighs these competing interests.

17. Kansas Gas Service’s plan places the most priority on promoting the public convenience and necessity. **Exhibit 1** creates section, township, range descriptions that solidify generic political certificate boundaries that exist today in Cowley, Sedgwick, Sumner, Reno, and Rice Counties. The public convenience and necessity is promoted when service providers remain consistent, which is a core focus of Kansas Gas Service’s plan. Likewise, buffer zones promote the public convenience and necessity by allowing a community’s incumbent utility to serve residents and businesses nearby, but outside, of city limits. The Commission has long recognized those in the vicinity of a city, town, or community’s core would need access to reliable natural gas service and authorized both Kansas Gas Service and Black Hills’ predecessors to provide that service. Kansas Gas Service’s certification plan continues this key policy goal.

¹⁶ *Kansas Gas & Elec. Co., v. Pub. Serv. Comm’n of Kansas*, 122 Kan. 462, 251 P. 1097, 1098 (1927).

¹⁷ *Kansas Gas & Elec. Co. v. Pub. Serv. Comm’n*, 124 Kan. 690, 261 P. 592, 594 (1927).

¹⁸ *Kansas Gas & Elec. Co., v. Pub. Serv. Comm’n of Kansas*, 122 Kan. 462, 251 P. 1097, 1099 (1927); *Wycoff v. Quick Way Homes, Inc.*, 201 Kan. 442, 446, 441 P.2d 886, 890 (1968) (“The statutory requirement that a public utility procure a proper certificate from the Commission was enacted for the protection and welfare of the people. The whole scheme of our law relating to public utilities was for that purpose.”).

18. By focusing primarily on the public interest, Kansas Gas Service’s plan inherently considers the interest of public utility companies already serving the territory. For the same reasons, Kansas Gas Service’s plan places no emphasis on entering areas already served by a utility. Three important aspects of this docket are: (1) Black Hills’ county-wide certificates, (2) currently operating municipal natural gas systems, and (3) where natural gas infrastructure is located.

19. Kansas Gas Service is not seeking and does not desire to use this docket as a door to enter a community already receiving service from Black Hills or operating its own municipal gas system. Because Black Hills is certified at the county level, any expansion of Kansas Gas Service’s certificate in these counties will necessarily “invade” Black Hills’ certificate.¹⁹ Any certification plan should not result in the duplication of service, which Kansas law and policy strongly caution against. To confirm this, Kansas Gas Service would accept a condition preventing it from serving a community that already has an established incumbent service provider.²⁰

20. The pitfalls of duplicative service are focused on two utilities providing the same service in the same area. Kansas Gas Service does not have visibility into Black Hills or a municipality’s system to know where their facilities are and where they currently provide service. Kansas Gas Service’s plan in **Exhibit 1** and expansion into Black Hills’ county-certified territory may not duplicate any service at all. If the areas outlined in **Exhibit 1** do not overlap with already existing utility infrastructure, then any service duplication concerns are greatly reduced. While Commission Staff reviews these comments and prepares its recommendation, Kansas Gas Service

¹⁹ *Kansas Gas & Elec. Co. v. Pub. Serv. Comm’n*, 124 Kan. 690, 261 P. 592, 596 (1927).

²⁰ As an example, “Notwithstanding the certified service territory included in Exhibit 1, Kansas Gas Service is not certified or authorized to provide service in [community name] as it exists today or as its limits are annexed and expanded in the future.” This type of proposal is already present in the 99-233 Docket’s Amended Joint Recommendation.

would welcome the opportunity to review existing infrastructure with Black Hills, and any municipality, to amend **Exhibit 1** if it inadvertently encroaches on an established area.

D. Rural Gas Expansion

21. Kansas Gas Service intends to use this opportunity to re-evaluate its line extension policies. Presently, Kansas Gas Service evaluates whether a distribution main extension is “ordinary” or “extraordinary.” Extraordinary extensions are those which are not revenue justified, that is, the amount of revenues received over ten years does not equal or exceed the initial extension cost. In these circumstances, the customer requesting the extension is required to compensate for the shortfall up front. As a result, most rural extensions to serve irrigation and agricultural needs require some upfront payment from the customer. These payments can be cost prohibitive, often resulting in extensions being designed, but not actually constructed. Existing tariff provisions and the ability for customers who funded an extension to receive refunds if additional customers connect has not been sufficient to construct distribution mains deeper into rural Kansas.

22. Kansas Gas Service intends to review its main extension policies to see if any adjustments could potentially help develop natural gas infrastructure in rural Kansas. While the specifics of any proposal would need to be reviewed in a separate docket, a policy that recognizes the unique characteristics of rural Kansas industries could help build out access to natural gas. For example, the period for economic evaluations could be lengthened, third-party cost sharing (e.g., with a cooperative) explored, or adjustments to points of delivery made. Kansas Gas Service believes there is merit and value to taking a renewed look at how its line extension policies can benefit rural areas and intends to perform that review following the conclusion of this docket.

II. CONCLUSION

23. The Commission requested parties present a certification plan that addresses dual certification issues for thirty-three communities in five Kansas counties. Kansas Gas Service's plan in **Exhibit 1** addresses the communities it serves and provides a reasonable plan for bringing long-term certificate stability to south central Kansas. Kansas Gas Service's plan in **Exhibit 1**:

- Directly addresses the scope of this investigation by providing a plan based on section, township, and range descriptions;
- Creates buffer zones around communities and preserves the intent of legacy Commission orders;
- Integrates Kansas Gas Service's prior filings;
- Creates continuous service territory between communities;
- Preserves the certification plan for Wichita approved in the 99-233 Docket;
- Is supported by Kansas law; and
- Provides a clear next step for expanding natural gas in rural Kansas.

24. Kansas Gas Service believes its plan is a reasonable and practical approach to resolving dual certification concerns in Cowley, Sedgwick, Sumner, Reno, and Rice Counties. In the same spirit of collaboration, Kansas Gas Service looks forward to working with Commission Staff, Black Hills, and any other stakeholder to address the goals of this docket.

WHEREFORE, Kansas Gas Service respectfully requests the Commission accept these Reply Comments, update its certified service territory to reflect the areas shown on **Exhibit 1**, and for any other relief the Commission deems just and reasonable.

[This space intentionally left blank. Signature follows.]

Respectfully submitted,

/s/ **Robert Elliott Vincent**

Robert Elliott Vincent, KS Bar #26028

Managing Attorney

Kansas Gas Service

A division of ONE Gas, Inc.

7421 West 129th Street

Overland Park, Kansas 66213-2634

Phone: (913) 319-8615

Fax: (913) 319-8622

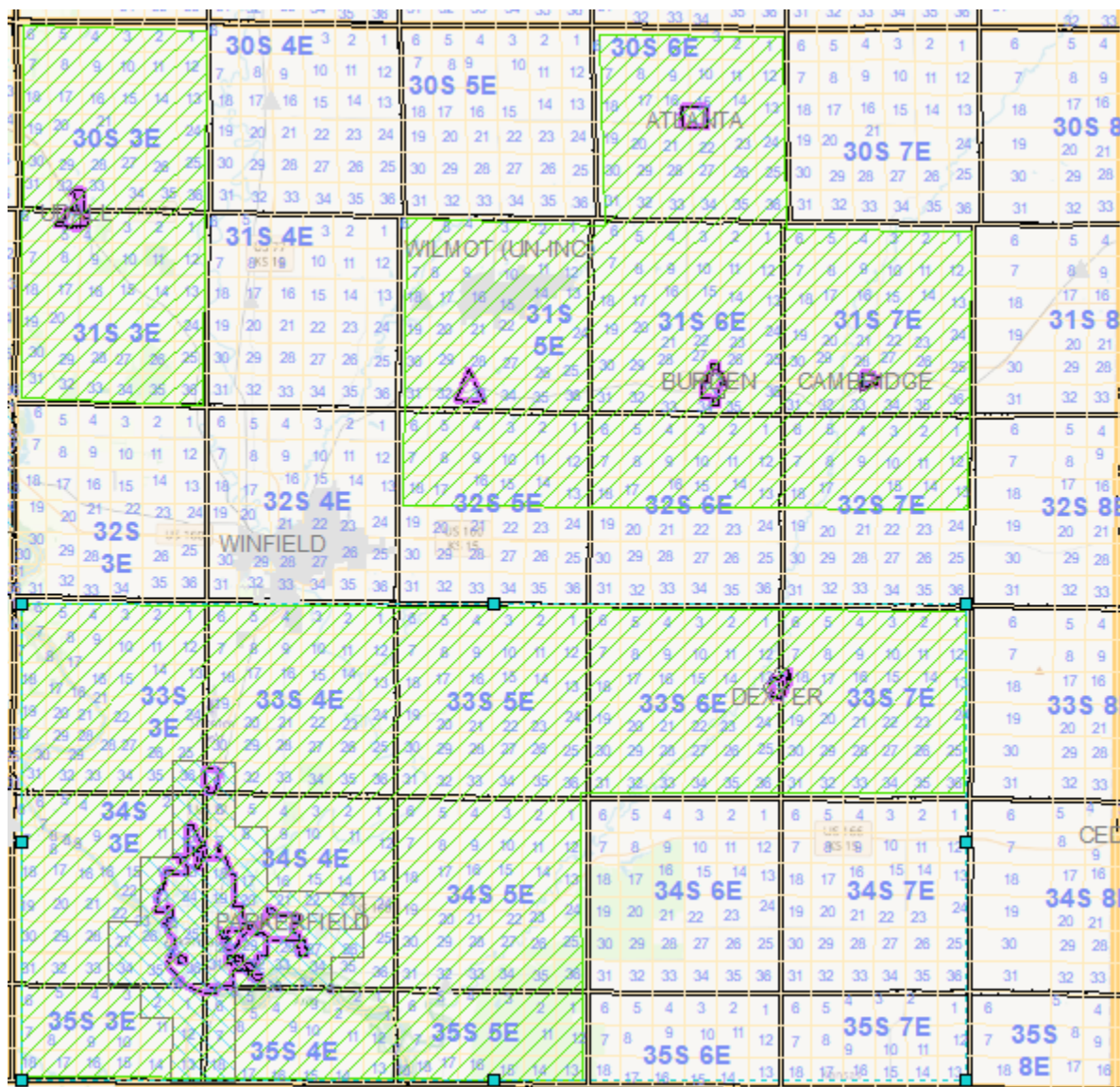
E-mail: robert.vincent@onegas.com

ATTORNEY FOR

KANSAS GAS SERVICE

A DIVISION OF ONE GAS, INC.

Exhibit 1
Cowley County
Proposed Metes and Bounds






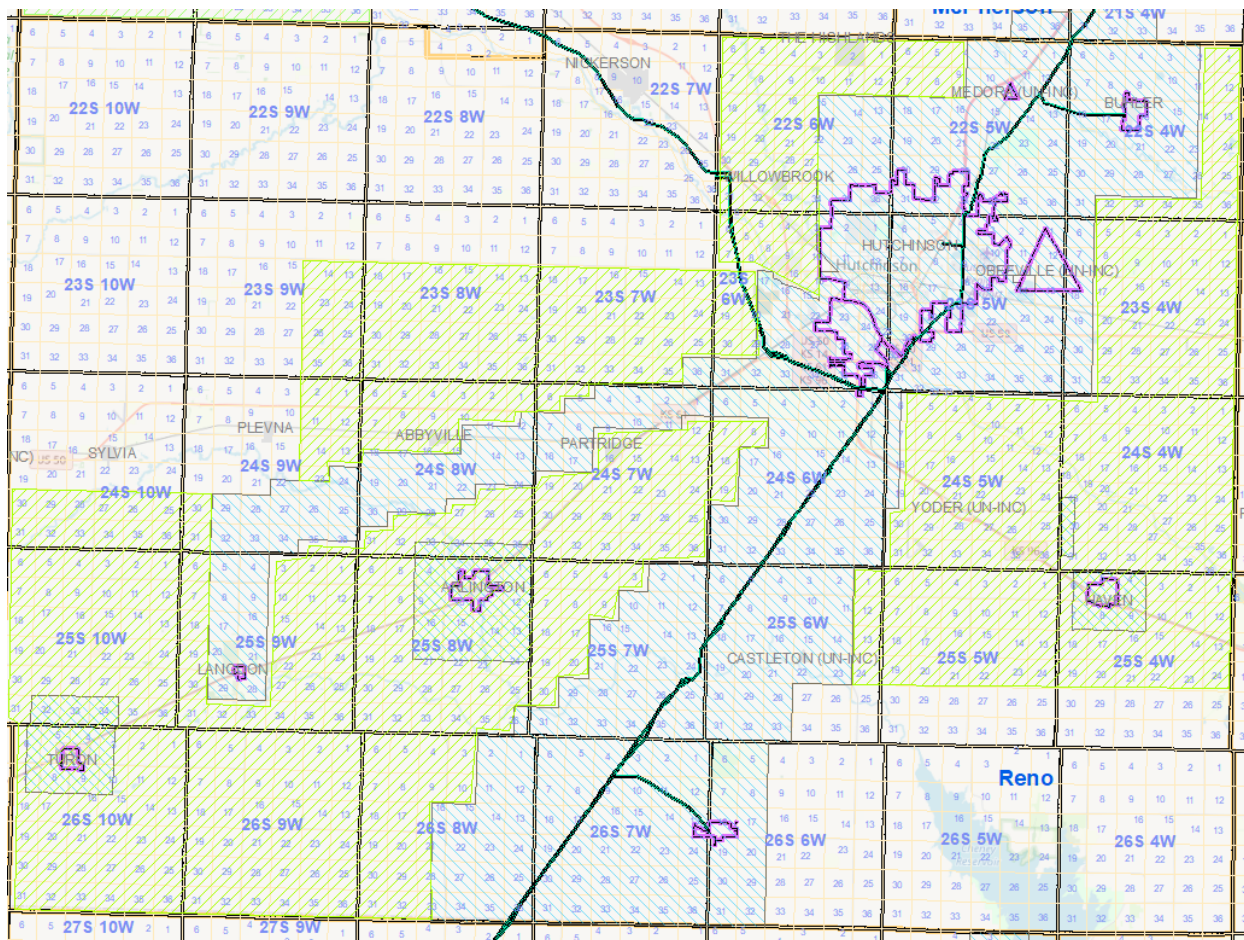
-  **Cities Served** – Arkansas City, Atlanta, Burden, Cambridge, Dexter, New Salem, Parkerfield, and Udall
-  KGS certified area
-  Proposed change

Exhibit 1

Reno County

Proposed Metes and Bounds

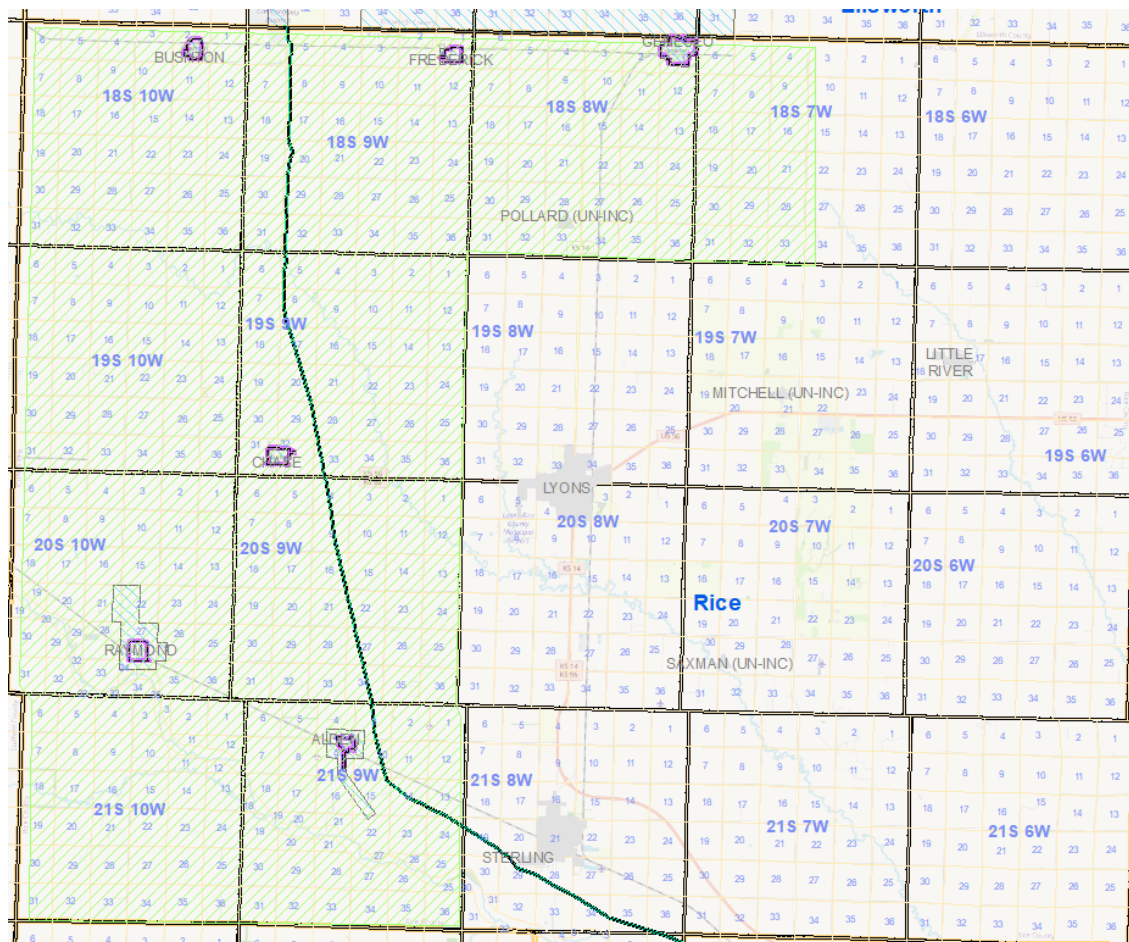


- Cities Served** – Arlington, Buhler, Haven, Hutchinson, Landon, Medora, Obeeville, Pretty Prairie, South Hutchinson, and Turon
- KGS certified area
- Proposed change

Exhibit 1

Rice County

Proposed Metes and Bounds






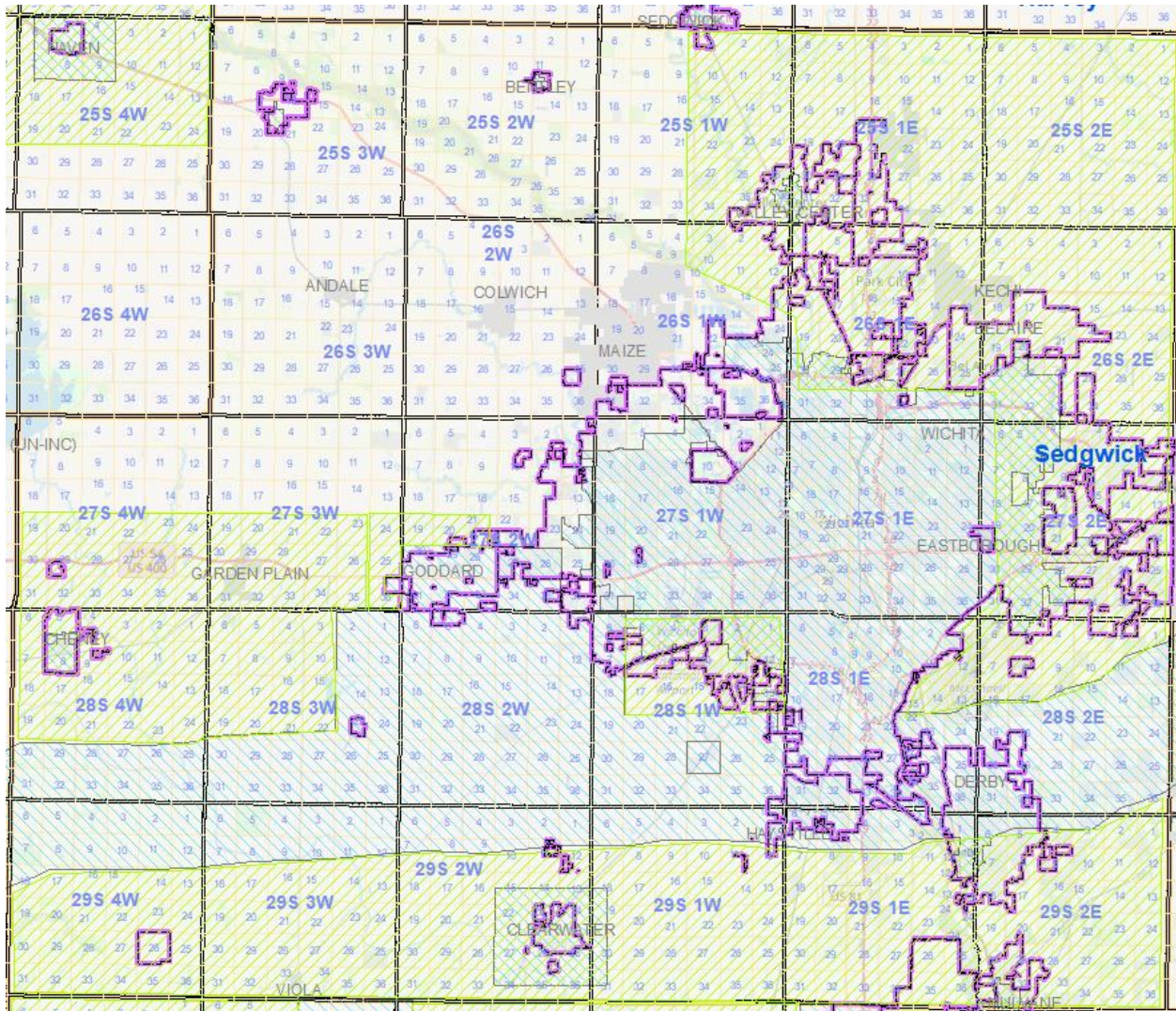
-  **Cities Served** – Aspen, Bushton, Chase, Frederick, Geneseo and Raymond
-  KGS certified area
-  Proposed change

Exhibit 1
Sedgwick County
Proposed Metes and Bounds

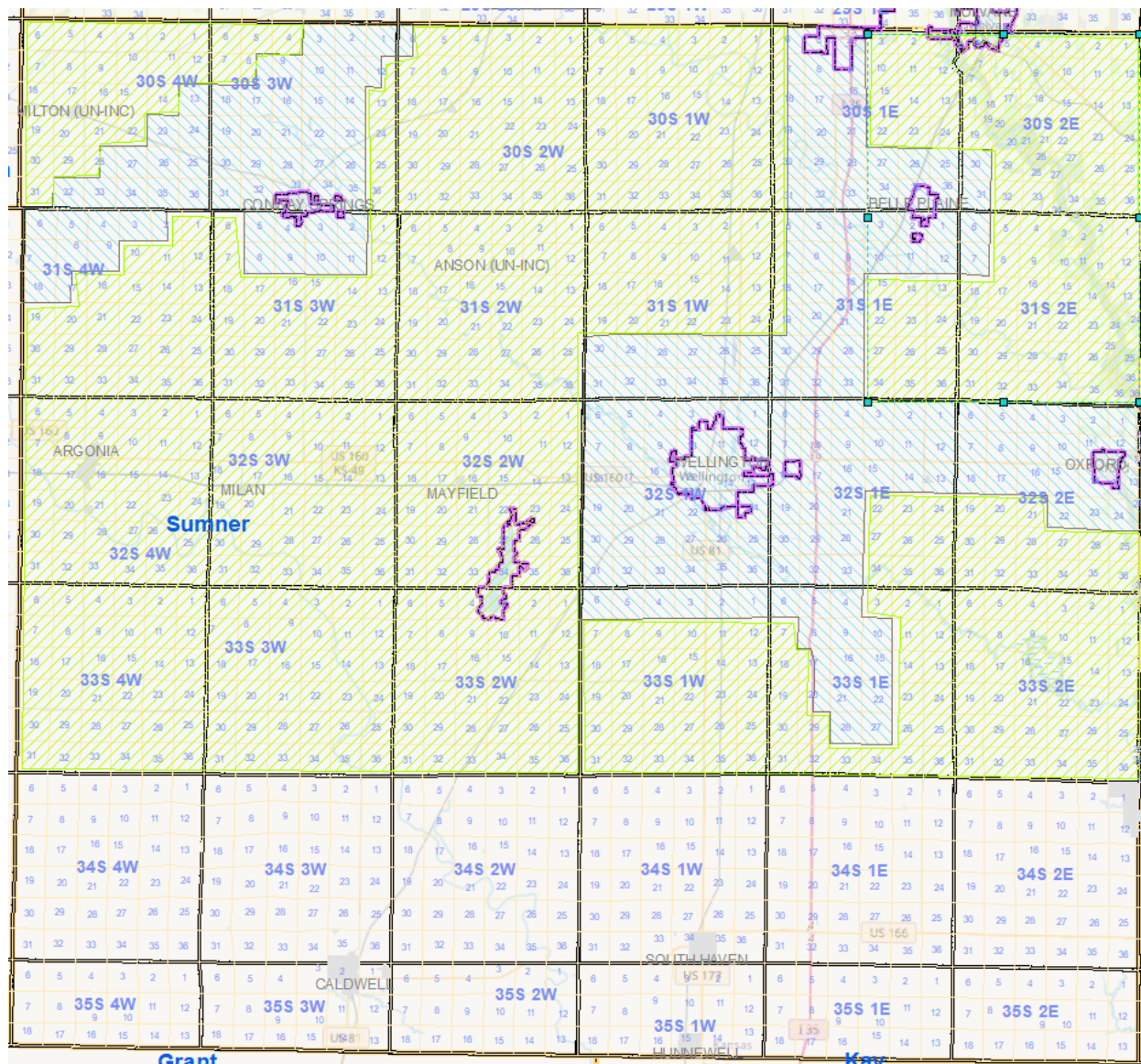


- Cities Served** – Bel Aire, Bentley, Cheney, Clearwater, Derby, Goddard, Haysville, Lake Waltana, Mount Hope, Mulvane, Park City, Sedgwick, Valley Center
- KGS certified area
- Proposed change

Exhibit 1

Sumner County

Proposed Metes and Bounds






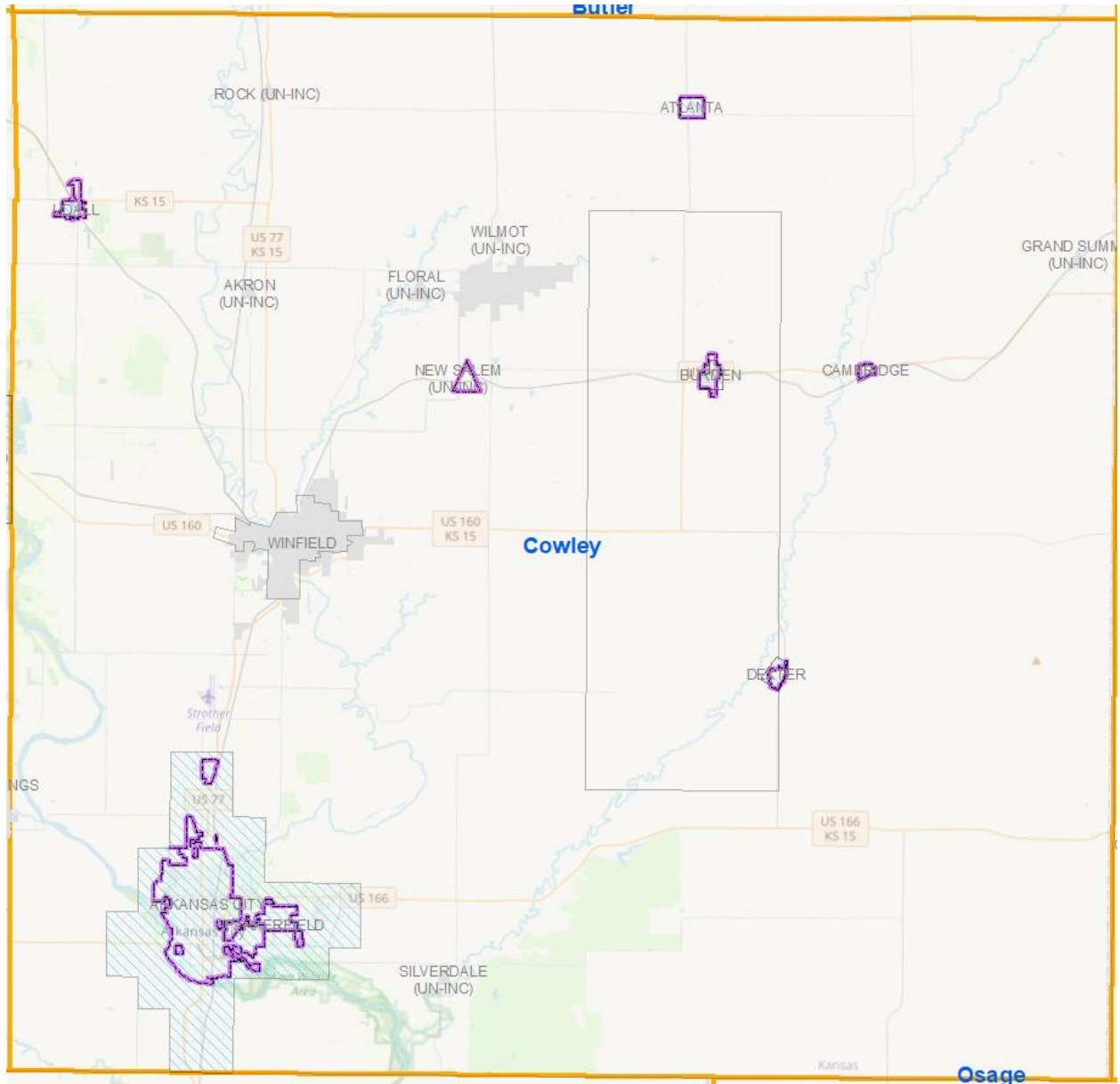
-  **Cities Served** – Belle Plaine, Conway Springs, Mulvane, Oxford and Wellington
-  KGS certified area
-  Proposed change

Exhibit 2
Cowley County
Cities served by Kansas Gas Service and
Current Certification





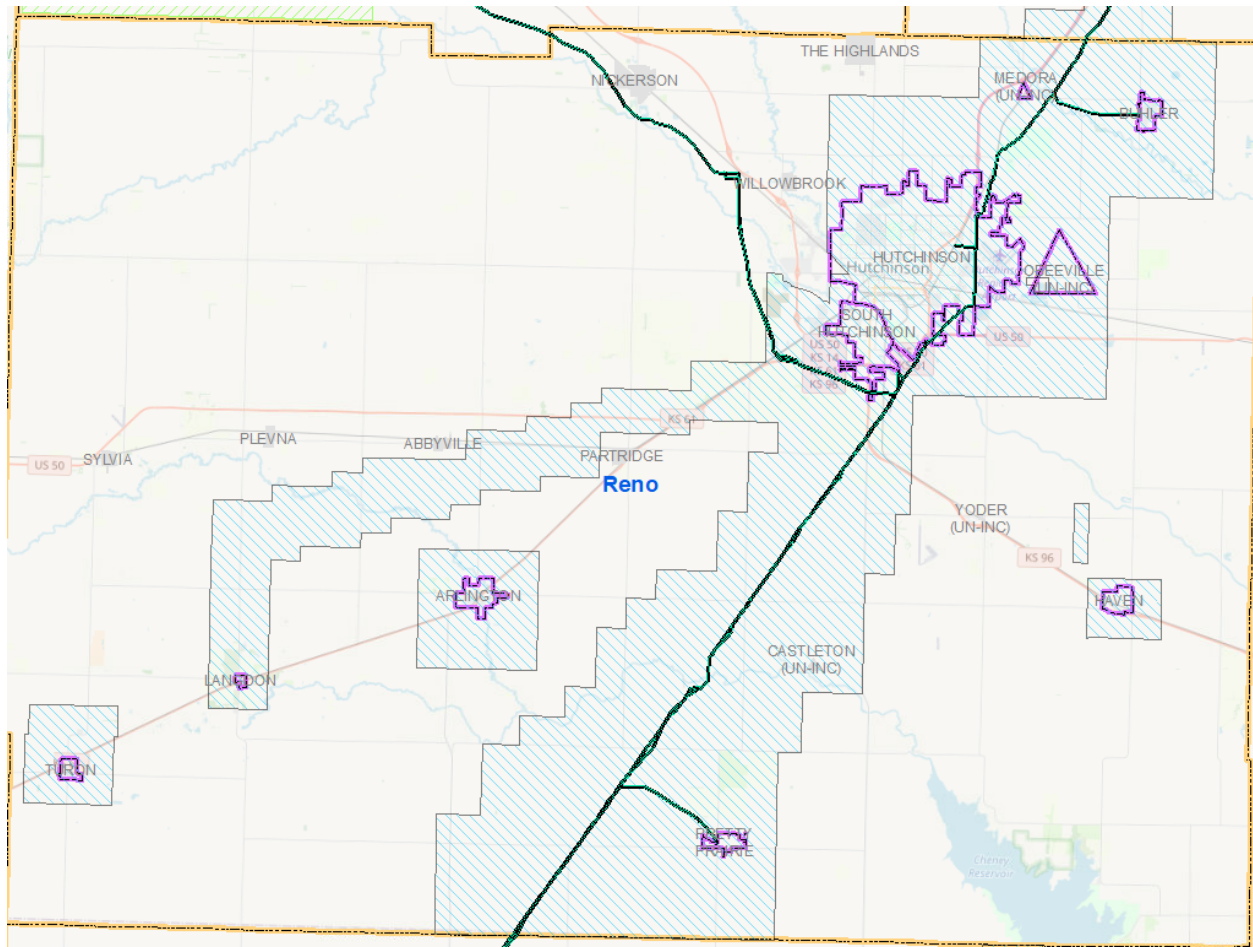
-  **Cities Served** – Arkansas City, Atlanta, Burden, Cambridge, Dexter, New Salem, Parkerfield, and Udall
-  **KGS certified area**

Exhibit 2
Reno County
Cities served by Kansas Gas Service and
Current Certification





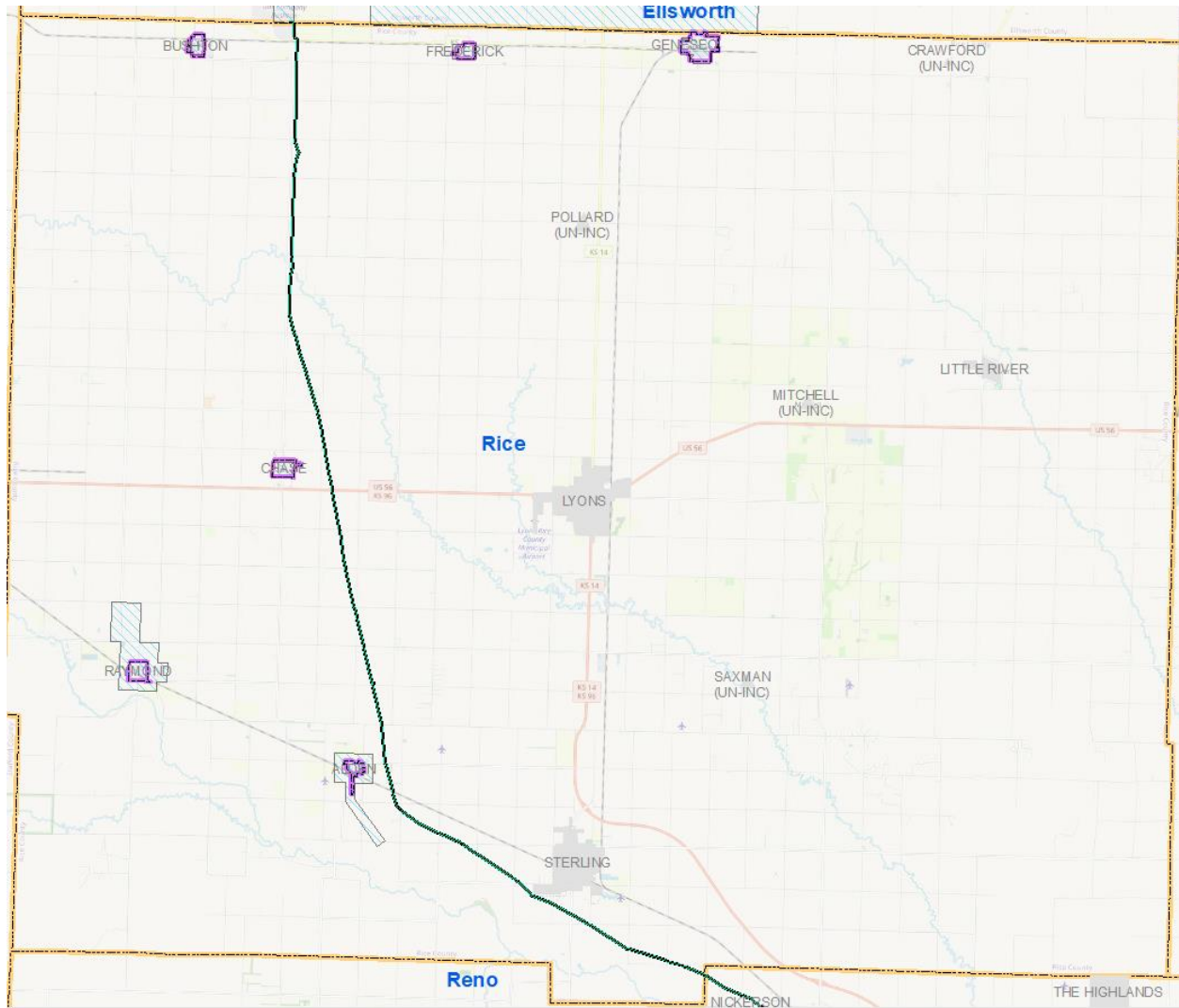
-  **Cities Served** – Arlington, Buhler, Haven, Hutchinson, Landon, Medora, Obeeville, Pretty Prairie, South Hutchinson, and Turon.
-  **KGS certified area**

Exhibit 2
Rice County
Cities served by Kansas Gas Service and
Current Certification





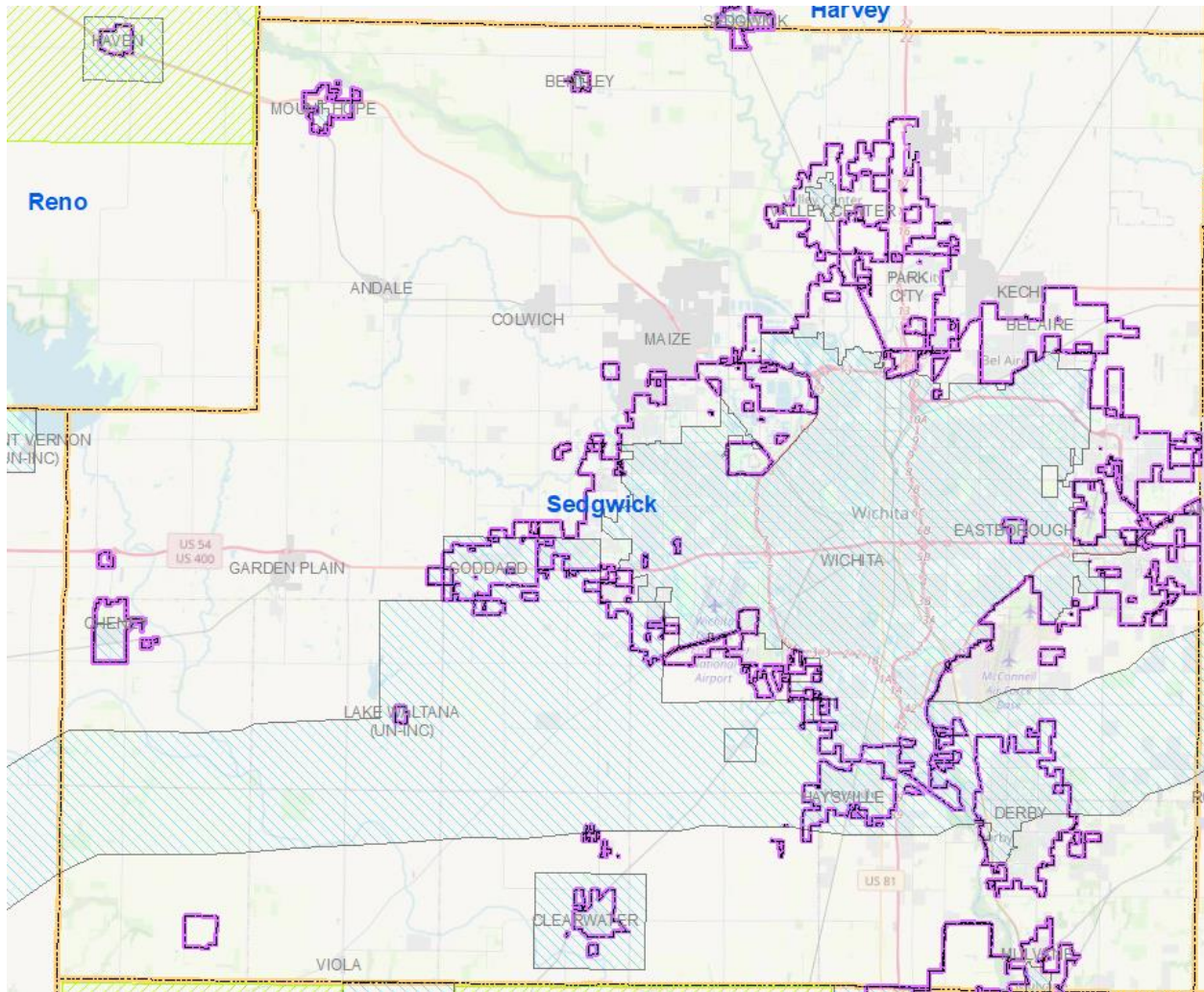
-  **Cities Served** – Aspen, Bushton, Chase, Frederick, Geneseo and Raymond
-  **KGS certified area**

Exhibit 2
Sedgwick County
Cities served by Kansas Gas Service and
Current Certification





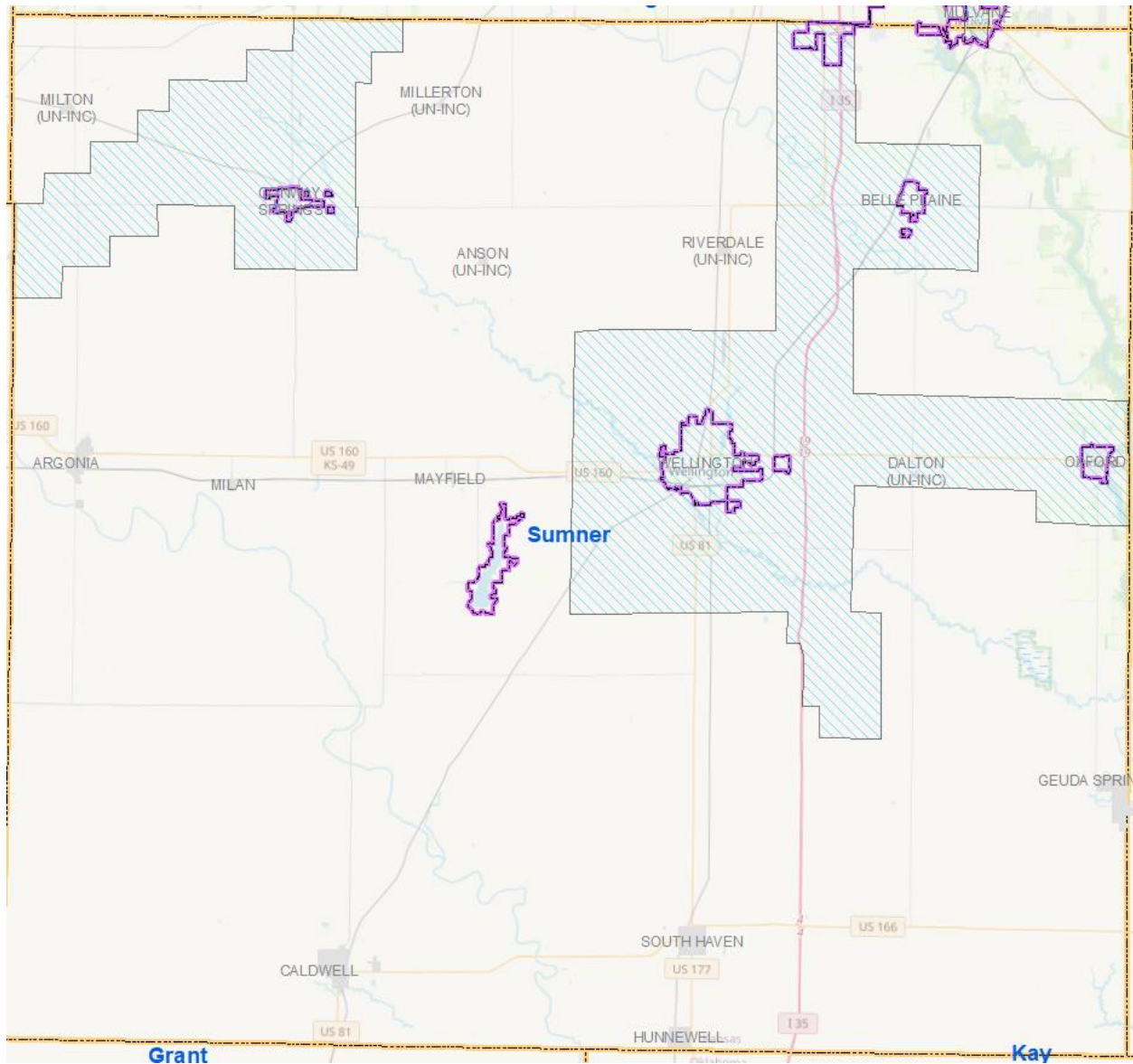


-  **Cities Served** – Bel Aire, Bentley, Cheney, Clearwater, Derby, Goddard, Haysville, Lake Waltana, Mount Hope, Mulvane, Park City, Sedgwick, Valley Center
-  **KGS certified area**

Exhibit 2
Sumner County
Cities served by Kansas Gas Service and
Current Certification



-  **Cities Served** – Belle Plaine, Conway Springs, Mulvane, Oxford and Wellington
-  **KGS certified area**

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF JOHNSON)

I, Robert Elliott Vincent, of lawful age, being first duly sworn upon oath, states as follows: I am a Managing Attorney for Kansas Gas Service, a Division of ONE Gas, Inc. I have read the above *Reply Comments of Kansas Gas Service on Metes and Bounds Descriptions and Buffer Zones for Thirty-Three Communities in Five Kansas Counties* and all the statements therein are true to the best of my knowledge, information, and belief.



Robert Elliott Vincent

Affiant

SUBSCRIBED AND SWORN to before me on 7/17/25.


Notary public

My Appointment Expires:

6/5/26



CERTIFICATE OF SERVICE

I, Robert Elliott Vincent, hereby certify that a copy of the above and foregoing *Reply Comments of Kansas Gas Service on Metes and Bounds Descriptions and Buffer Zones for Thirty-Three Communities in Five Kansas Counties* was forwarded this 18th day of July 2025, addressed to:

NICK SMITH, MANAGER OF
KANSAS REGULATION
BLACK HILLS ENERGY
CORPORATION
601 North Iowa Street
Lawrence, KS 66044
nick.smith@blackhillscorp.com

DOUGLAS LAW, ASSOCIATE
GENERAL COUNSEL
BLACK HILLS/KANSAS GAS
UTILITY COMPANY,
LLC D/B/A BLACK HILLS
ENERGY
1731 WINDHOEK DRIVE
LINCOLN, NE 68512
douglas.law@blackhillscorp.com

AARON BAILEY, ASSISTANT
GENERAL COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
aaron.bailey@ks.gov

CARLY MASENTHIN, SENIOR
LITIGATION COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Carly.Masenthin@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

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

/s/ Robert Elliott Vincent
Robert Elliott Vincent, KS Bar No. 26028
Managing Attorney
KANSAS GAS SERVICE
A division of ONE Gas, Inc.
7421 West 129th Street
Overland Park, Kansas 66213-5957
(913) 319-8615 Phone
(913) 319-8622 Fax
robert.vincent@onegas.com