

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

**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 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 NE., Inc.; and 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 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.

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's legal interests may be substantially affected by the decisions of the Commission in this docket. Freedom Pipeline is a natural gas transport and gas supply customer of KGS. Freedom Pipeline will likely be bound by any order issued by the Commission in this docket and may be substantially affected by the outcome of this proceeding respecting the Transportation services provided to Freedom Pipeline by KGS. 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. KGS' application was filed only two weeks ago, and no procedural schedule has yet been established for the docket. No prejudice will be suffered by KGS 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:

Kirk Heger  
1901 University Drive  
Lawrence, Kansas 66044  
[kirkheger@gmail.com](mailto:kirkheger@gmail.com)

Montgomery Escue  
PO Box 622377  
Oviedo, Florida 32762  
[montgomery@escue.com](mailto:montgomery@escue.com)

Richard Hanson  
16171 Road I  
Liberal, Kansas 67901  
[rlhanson@wbsnet.org](mailto:rlhanson@wbsnet.org)

David N. Dittmore  
609 Regent Park Drive  
Mt. Juliet, Tennessee  
[d.dittmore28@gmail.com](mailto:d.dittmore28@gmail.com)

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,

*Glenda Cafer*

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Glenda Cafer (#13342)  
Morris Laing Evans Brock & Kennedy  
800 SW Jackson, Ste 1310  
Topeka, Kansas 66612  
Phone: (785) 430-2003  
[gcafer@morrislaing.com](mailto:gcafer@morrislaing.com)

Will B. Wohlford (#21773)  
Morris Laing Evans Brock & Kennedy  
300 N. Mead, Ste 200  
Wichita, Kansas 67202  
Phone: (316) 262-2671  
[wwohlford@morrislaing.com](mailto:wwohlford@morrislaing.com)

**ATTORNEYS FOR FREEDOM PIPELINE**

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SHAWNEE    )

**VERIFICATION**

I, Glenda Cafer, 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.

*Glenda Cafer*

## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing **Petition to Intervene of Freedom Pipeline, LLC** was electronically served on this 14<sup>th</sup> day of April, 2023 to:

JAMES G. FLAHERTY, ATTORNEY  
ANDERSON & BYRD, L.L.P.  
216 S HICKORY  
PO BOX 17  
OTTAWA, KS 66067  
[jflaherty@andersonbyrd.com](mailto:jflaherty@andersonbyrd.com)

SHELLY M. BASS, SENIOR ATTORNEY  
ATMOS ENERGY CORPORATION  
5430 LBJ FREEWAY  
1800 THREE LINCOLN CENTRE  
[shelly.bass@atmosenergy.com](mailto:shelly.bass@atmosenergy.com)

KEN FOGLE, VP FOR MARKETING  
ATMOS ENERGY CORPORATION  
1555 BLAKE STREET, SUITE 400  
DENVER, CO 80202  
[ken.fogle@atmosenergy.com](mailto:ken.fogle@atmosenergy.com)

JEFF AUSTIN  
AUSTIN LAW P.A.  
7111 W. 151<sup>ST</sup> STREET, SUITE 315  
OVERLAND PARK, KS 66223  
[jeff@austinlawpa.com](mailto:jeff@austinlawpa.com)

C. EDWARD PETERSON  
ATTORNEY AT LAW  
5522 ABERDEEN  
FAIRWAY, KS 66205  
[ed.peterson2010@gmail.com](mailto:ed.peterson2010@gmail.com)

JOSEPH R. ASTRAB, ATTORNEY  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD.  
TOPEKA, KS 66604  
[j.astrab@curb.kansas.gov](mailto:j.astrab@curb.kansas.gov)

TODD E. LOVE, ATTORNEY  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD.  
TOPEKA, KS 66604  
[t.love@curb.kansas.gov](mailto:t.love@curb.kansas.gov)

DAVID W. NICKEL, CONSUMER COUNSEL  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[d.nickel@curb.kansas.gov](mailto:d.nickel@curb.kansas.gov)

SHONDA RABB  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[s.rabb@curb.kansas.gov](mailto:s.rabb@curb.kansas.gov)

DELLA SMITH  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[d.smith@curb.kansas.gov](mailto:d.smith@curb.kansas.gov)

ALEX GOLDBERG, ATTORNEY  
EVERSHEDS SUTHERLAND (US) LLP  
1196 S MONROE STREET  
DENVER, CO 80210  
[alexgoldberg@eversheds-sutherland.us](mailto:alexgoldberg@eversheds-sutherland.us)

BRIAN G. FEDOTIN, GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[b.fedotin@kcc.ks.gov](mailto:b.fedotin@kcc.ks.gov)

WALKER HENDRIX, LITIGATION  
COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[w.hendrix@kcc.ks.gov](mailto:w.hendrix@kcc.ks.gov)

CARLY MASENTHIN  
LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[c.masenthin@kcc.ks.gov](mailto:c.masenthin@kcc.ks.gov)

JANET BUCHANAN, DIRECTOR-  
REGULATORY AFFAIRS / OKE 13165  
KANSAS GAS SERVICE, A DIVISION OF  
ONE GAS, INC.  
7421 W 129TH STREET  
OVERLAND PARK, KS 66213  
[janet.buchanan@onegas.com](mailto:janet.buchanan@onegas.com)

LORNA EATON, RATES/REG.AFFAIRS  
KANSAS GAS SERVICE, A DIVISION OF  
ONE GAS, INC.  
7421 W 129TH STREET  
OVERLAND PARK, KS 66213  
[lorna.eaton@onegas.com](mailto:lorna.eaton@onegas.com)

ROBERT E. VINCENT, MANAGING ATTY  
KANSAS GAS SERVICE, A DIVISION OF  
ONE GAS, INC.  
7421 W. 129TH STREET  
OVERLAND PARK, KS 66213  
[robert.vincent@onegas.com](mailto:robert.vincent@onegas.com)

PAUL MAHLBERG, GENERAL MANAGER  
KANSAS MUNICIPAL ENERGY AGENCY  
6300 W 95TH ST  
OVERLAND PARK, KS 66212-1431  
[mahlberg@kmea.com](mailto:mahlberg@kmea.com)

TERRI J PEMBERTON, COUNSEL  
KANSAS MUNICIPAL ENERGY AGENCY  
6300 W 95TH ST  
OVERLAND PARK, KS 66212-1431  
[pemberton@kmea.com](mailto:pemberton@kmea.com)

DARREN PRINCE, MANAGER,  
REGULATORY & RATES  
KANSAS MUNICIPAL ENERGY AGENCY  
6300 W 95TH ST  
OVERLAND PARK, KS 66212-1431  
[prince@kmea.com](mailto:prince@kmea.com)

DIXIE RIEDEL, Director of Natural Gas  
KANSAS MUNICIPAL ENERGY AGENCY  
6300 W 95TH ST  
OVERLAND PARK, KS 66212-1431  
[riedel@kmea.com](mailto:riedel@kmea.com)

FRANK A. CARO, ATTORNEY  
POLSINELLI PC  
900 W 48TH PLACE STE 900  
KANSAS CITY, MO 64112  
[fcaro@polsinelli.com](mailto:fcaro@polsinelli.com)

JARED R. JEVONS, ATTORNEY  
POLSINELLI PC  
900 W 48TH PLACE STE 900  
KANSAS CITY, MO 64112  
[jjevons@polsinelli.com](mailto:jjevons@polsinelli.com)

STACY WILLIAMS, SVP, General Counsel  
SYMMETRY ENERGY, LLC  
1111 Louisiana St.  
Houston, TX 77002  
[Stacy.williams@symmetryenergy.com](mailto:Stacy.williams@symmetryenergy.com)

DON KRATTENMAKER, Vice President  
WOODRIVER ENERGY, LLC  
633 17th St., Ste. 1410  
Denver, CO 80202  
[don.krattenmaker@woodriverenergy.com](mailto:don.krattenmaker@woodriverenergy.com)

JUDY JENKINS HITCHYE, ATTORNEY  
WRIGHT LAW FIRM  
717 Texas Street  
Suite 1200  
Houston, TX 77002  
[judyjenkinshitchye@wrightfirm.law](mailto:judyjenkinshitchye@wrightfirm.law)

KIRK HEGER  
1901 UNIVERSITY DRIVE  
LAWRENCE, KS 66044  
[kirkheger@gmail.com](mailto:kirkheger@gmail.com)

MONTGOMERY ESCUE  
PO BOX 622377  
OVIEDO, FL 32762  
[montgomery@escue.com](mailto:montgomery@escue.com)

RICHARD HANSON  
16171 ROAD I  
LIBERAL, KS 67901  
[rlhanson@wbsnet.org](mailto:rlhanson@wbsnet.org)

VALERIE SMITH, ADMIN. ASSISTANT  
MORRIS LAING LAW FIRM  
800 SW JACKSON, SUITE 1310  
TOPEKA, KS 66612-1216  
[vsmith@morrislaing.com](mailto:vsmith@morrislaing.com)

GLENDA CAFER, ATTORNEY  
MORRIS LAING LAW FIRM  
800 SW JACKSON, SUITE 1310  
TOPEKA, KS 66612-1216  
[gcafer@morrislaing.com](mailto:gcafer@morrislaing.com)

WILL WOHLFORD, ATTORNEY  
MORRIS LAING LAW FIRM  
300 N. MEAD, SUITE 200  
WICHITA, KS 67202  
[wwohlford@morrislaing.com](mailto:wwohlford@morrislaing.com)

DAVID N. DITTEMORE  
609 REGENT PARK DRIVE  
Mt. JULIET, TENNESSEE  
[d.dittimore28@gmail.com](mailto:d.dittimore28@gmail.com)

*Glenda Cafer*  
Glenda Cafer