

**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) Docket No. 25-GGSG-459-COC
Facility in Kiowa County, Kansas and for)
Approval of Initial Terms and Conditions for)
Services and Rates.)

PETITION TO INTERVENE

Kansas Gas Service, a division of ONE Gas, Inc., (“Kansas Gas Service”), respectfully petitions the State Corporation Commission of the State of Kansas (“Commission”) to intervene in this docket pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support of this petition, Kansas Gas Service states the following to the Commission:

I. DESCRIPTION OF KANSAS GAS SERVICE

1. Kansas Gas Service is a natural gas public utility operating in the state of Kansas under certificates of convenience and necessity issued by the Commission. ONE Gas, Inc., is a 100% regulated natural gas distribution company, operating the largest natural gas public utilities in Kansas and Oklahoma, and the third largest in Texas. Kansas Gas Service’s principal place of business in Kansas is 7421 West 129th Street, Overland Park, Kansas 66213.

II. COMMUNICATION

2. The following persons are authorized to receive pleadings, notices, orders, discovery requests, and other communications in this docket on behalf of Kansas Gas Service:

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III. PETITION TO INTERVENE

3. Golden Gas Storage Company (“GGSC”) has requested a certificate of convenience and necessity to operate natural gas storage and pipeline facilities in Kiowa County, Kansas (“Joy Station”).¹ Kansas Gas Service fully supports GGSC’s Joy Station project. Access to natural gas storage provides operational flexibility and supply resiliency to a potentially broad group of stakeholders, including Kansas’ gas and electric public utilities, large industrial customers, municipalities, and natural gas marketers. GGSC’s Joy Station offers the first chance in decades to meaningfully expand natural gas storage capacity in Kansas, and Kansas Gas Service fully supports GGSC’s request in this proceeding.

4. Kansas Gas Service submits that its rights, duties, privileges, immunities or other legal interests may be substantially affected by this proceeding. No other party may adequately represent Kansas Gas Service’s interests, and the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing Kansas Gas Service’s intervention. GGSC’s Joy Station will interconnect with Kansas Gas Service’s transmission system, and GGSC and Kansas Gas Service have executed a precedent agreement for a portion of Joy Station’s Phase I storage. The conditions and terms of service approved in this docket will directly impact Kansas Gas Service. Having impacted stakeholders present promotes the interests of justice, and with no procedural schedule yet set, Kansas Gas Service’s intervention will not disrupt the proceeding.

¹ Application, p. 1 (June 3, 2025).

A. Rights Substantially Impacted

5. Joy Station is located near six (6) interstate pipelines and one (1) intrastate pipeline.² In Phase I of the Joy Station project, GGSC intends to connect its Joy Station gas storage facility to one or more of those pipelines.³ **Exhibit B-2** to GGSC's Application lists the legal description of GGSC's proposed pipelines. GGSC's Application demonstrates it intends to connect to Kansas Gas Service's transmission system (i.e., Kansas Gas Service's transmission system is the "intrastate pipeline" referred to in GGSC's Application). GGSC and Kansas Gas Service's plan to interconnect Joy Station with Kansas Gas Service's transmission system clearly demonstrates Kansas Gas Service's legal rights may be substantially affected by this proceeding.

6. GGSC and Kansas Gas Service have executed a precedent agreement for a portion of Joy Station's Phase I storage. If the Commission approves GGSC's Application, GGSC and Kansas Gas Service will move forward with the execution of an agreement for Firm Storage Service consistent with such approvals. Accordingly, the Commission's review and approval of GGSC's proposed tariff will directly and substantially affect the rates and terms of service Kansas Gas Service receives from GGSC.

B. Intrastate Clarification

7. Kansas Gas Service's transmission system is an "intrastate pipeline" as the term is used colloquially in GGSC's Application. However, Kansas Gas Service's transmission system is not an "intrastate pipeline" as defined in the Natural Gas Policy Act of 1978 ("NGPA").⁴ Kansas Gas Service's transmission system is a Hinshaw pipeline exempt from FERC regulation.⁵

² See *id.* at ¶ 4.

³ See *id.*

⁴ Under the NGPA, an "intrastate pipeline" is defined as, "any person engaged in natural gas transportation (not including gathering) which is not subject to the jurisdiction of the Commission under the Natural Gas Act (other than any such pipeline which is not subject to the jurisdiction of the Commission solely by reason of section 1(c) of the Natural Gas Act). 15 U.S.C.A. 3301(16).

⁵ Kansas Power & Light Co., 20 FERC ¶ 62,456, 63,758 (1982).

Accordingly, pursuant to the NGPA's definitions, Kansas Gas Service is a local distribution company.

8. An NGPA intrastate pipeline may transport natural gas on behalf of: (i) any interstate pipeline, and (ii) any local distribution company served by an interstate pipeline.⁶ Notwithstanding, Kansas Gas Service has received a certificate of public convenience and necessity pursuant to 18 C.F.R. Section 284.224 of the FERC regulations from FERC under Section 7(c) of the Natural Gas Act to engage in the sale, transportation, or assignment of natural gas in interstate commerce *as if* it were an intrastate pipeline as defined in the NGPA.⁷

III. CONCLUSION

9. Kansas Gas Service fully supports GGSC's Joy Station project, and recommends the Commission approve GGSC's request for a certificate of convenience and necessity. Since GGSC intends to connect the Joy Station with Kansas Gas Service's transmission system, and since Kansas Gas Service intends to take storage service from GGSC's Joy Station, Kansas Gas Service's rights will be substantially affected by this proceeding. Kansas Gas Service is a critical stakeholder in the Joy Station project and routinely appears before the Commission in proceedings. Granting Kansas Gas Service's intervention and participation in this docket promotes the interests of justice and will not impair the orderly and prompt conduct of these proceedings. Therefore, the Commission should grant Kansas Gas Service's Petition to Intervene.

WHEREFORE, Kansas Gas Service prays the Commission enters an Order permitting its intervention, and for any such other relief as the Commission may deem just and reasonable.

⁶ 15 U.S.C.A. 3371(a)(2); 18 C.F.R. 284.122(a).

⁷ See Kansas Power & Light Co., 20 FERC ¶ 62456, 63759 (1982). Note: The Hinshaw certificate regulation is now 18 C.F.R. 284.224, whereas it was 18 C.F.R. 284.222 at the time Kansas Gas Service's Natural Gas Act Section 7(c) certificate was issued. See Order 436, 50 FR 42497, 42498 (Oct. 18, 1985).

Respectfully submitted,

/s/ Robert Elliott Vincent

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VERIFICATION

STATE OF KANSAS)
) ss
COUNTY OF JOHNSON)

Robert Vincent of lawful age, being first duly sworn upon oath, deposes and states:
That he is an attorney for Kansas Gas Service, a Division of ONE Gas, Inc.; that he has
read the above and foregoing *Petition to Intervene* and that the statements therein contained
are true according to his knowledge, information and belief.



Robert Elliott Vincent

Subscribed and sworn before me this 25th day of August, 2025.



Notary Public

My Appointment Expires: 6/5/26



CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing *Petition to Intervene* was forwarded this 26th day of August 2025, addressed to:

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