

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Application of Plains Producers )  
Association, Inc., a Kansas Not for Profit Corporation, )  
to Amend its Certificate of Convenience and ) Docket No. 15-PPAG-\_\_\_\_\_-COC  
Necessity to Provide Natural Gas Service in a Certain )  
Portion of Meade County, Kansas. )

**APPLICATION TO AMEND CERTIFICATE**

Plains Producers Association, Inc., (Plains Producers), hereby makes this Application to the State Corporation Commission of the State of Kansas (Commission), pursuant to K.S.A. § 66-104c, requesting expedited approval by October 1, 2014, of an amendment to Plains Producers' service territory to include Alexander Feeders, located at 2071 US HWY 54, Plains, Kansas. In support of its Application, Plains Producers states the following:

1. Plains Producers is a customer-owned Kansas not-for-profit corporation, in good standing, operating as a certificated nonprofit natural gas public utility in portions of Seward and Meade County, Kansas. On May 21, 1999, and pursuant to K.S.A. § 66-104c and K.S.A. § 66-131, the Commission granted Plains Producers' a Certificate of Convenience and Necessity to operate as a Kansas nonprofit public utility in Docket No. 99-PPAG-669-COC.

2. Plains Producers continues to qualify as a nonprofit public utility under the provisions of K.S.A. § 66-104c(a). Specifically, Plains Producers states that (1) [e]very customer, shareholder, household or meter owner is an owner of the Plains Producers and has an equal vote on matters concerning the utility; (2) Plains Producers employs no full-time employees; and (3) Plains Producers has no more than 100 customers. A list of the Plains Producers' member-shareholders is attached hereto as **Exhibit A**.

3. Alexander Feeders, is located at 2071 US HWY 54, Plains, Kansas, and is a pig farm operation located in the service territory of Black Hills Energy (Black Hills). Alexander Feeders is currently using propane to fuel its operation and has been in discussions with Black Hills regarding the possibility of Plains Producers extending natural gas service to the facility. Black Hills has indicated that it is agreeable to allowing Plains Producers to serve Alexander Feeders at the Plains, Kansas location. As a result, Plains Producers and Black Hills agreed that Plains Producers will seek Commission approval to provide natural gas service to Alexander Feeders, and in exchange, Black Hills will not to object to Plains Producers' Application to Amend Certificate to include service to this customer specific location.

4. Plains Producers is seeking expedited approval of this Application because Alexander Feeders is faced with the necessity of procuring propane for the winter, which will result in significant expenditures for Alexander Feeders. Alexander Feeders hopes to offset the costs associated with the extension of the natural gas lines to its facility by avoiding the costs associated with filling its propane tanks.

5. Plains Producers requests that its certificate be amended to include natural gas service to one customer specific location only, identified as follows:

**MEADE COUNTY**

Alexander Feeders, located at 2071 US HWY 54, in the city of Plains, Kansas – NW1/4, S30, T32S, R30W, Meade County.

6. Plains Producers acknowledges that for the purposes of constructing the new natural gas supply line it has and will comply with all applicable pipeline safety laws as required by K.S.A. § 66-104c(b).

7. With winter approaching, time is of the essence in this matter. As such, Plains Producers respectfully requests the Commission issue its order in this matter by October 1, 2014.

8. In addition to the undersigned counsel, all correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Roger Holmes  
Plains Producers Association, Inc.  
P.O. Box 699  
Plains, Kansas 67869

WHEREFORE Plains Producers Association, Inc. respectfully requests the Commission grant this Application to Amend Certificate by issuing its Order in this matter by October 1, 2014.

Respectfully submitted,

/s/ Terri Pemberton

Glenda Cafer (#13342)

(785) 271-9991

Terri Pemberton (#23297)

(785) 232-2123

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**COUNSEL FOR PLAINS PRODUCERS  
ASSOCIATION, INC.**

**PLAINS PRODUCERS ASSOCIATION, INC.****BOARD OF DIRECTORS:**

Roger Holmes	Box 699, Plains, KS 67869
Layne Angell	Box 249, Plains, KS 67869
Larry Eakes	13204 2 Road, Plains, KS 67869
Ray Amerin	Box 670, Plains, KS 67869
David Clawson	Box 146, Englewood, KS 67840

**OFFICERS :**

President _____	Roger Holmes, Box 699, Plains, KS 67869
Vice president _____	Ray Amerin, Box 670, Plains, KS 67869
Secretary-Treasurer _____	Larry Eakes, 13204 2 Road, Plains, KS 67869

**MEMBER-SHAREHOLDERS & APPLICANT MEMBER-SHAREHOLDERS:**

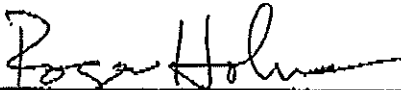
Carl Holmes	Box 2288	Liberal, KS 67901
Chester Rexford	2206 9 Road	Montezuma, KS 67867
Clair Bender	Box 128	Plains, KS 67869
Cole Owens	Box 1834	Garden City, KS 67846
Dan Eakes	Box 615	Plains, KS 67869
David Clawson	Box 146	Englewood, KS 67840
Don Irons	11252 Wildfire Rd.	Minneola, KS 67865
Vail Fruechting	102 N Terrace	Plains, KS 67869
Ed Amerin	Box 772	Plains, KS 67869
Roger Holmes	Box 699	Plains, KS 67869
Jim Hush	Box 458	Plains, KS 67869
JoAnn Kisner	Box 384	Plains, KS 67869
John W. McVey	1720 N. Cain	Liberal, KS 67901
Larry Eakes	Rt. 1, Box 3	Plains, KS 67869
Layne Angell	Box 249	Plains, KS 67869
Marvin & Fae Schrag	17509 S K-17 Hwy	Pretty Prairie, KS 67570
Pauline Hulburt	115 Delwood Dr.	Athens, GA 30606-4801
Ray Amerin	Box 670	Plains, KS 67869
Ruby Hamm	Box 457	Plains, KS 67869
Sara Fiertag	8601 Shannon Way	Wichita, KS 67206
Sturgeon Family Ltd Partnership	Box 47428	Wichita, KS 67201
Wayne Powell	Box 776	Plains, KS 67869
Wendell Fox	Box 579	Plains, KS 67869
Wes Coats	Box 91	Plains, KS 67869
Kirby & Mary Clawson	RR 1, Box 65F	Satanta, KS 67870
Warren Angell	501 West C	Plains, KS 67869
Opportunity Feeders	60 1 Ark Avenue	Kismet, KS 67859
Dan Pace	13 Prairie Dunes Dr.	Hutchinson, KS 67502
Mannley Bromwell	P.O. Box 426	Plains, KS 67869
Scott Reiss	HCR 1, Box 5	Plains, KS 67869
John Dreitz	P.O. Box 61	Plains, KS 67869
Marcellene Whinery	11501 W 101 <sup>st</sup> St	Overland Park, KS 66214-2444
Carolyn Gordon	7911 S 92 East Ok	Tulsa, OK 74133-4949
Everett Feiser	P.O. Box 166	Plains, KS 67869
Plains Equity Exchange	P.O. Box 157	Plains, KS 67869
Alexander Feeders	P.O. Box 344	Natoma, KS 67651

**VERIFICATION**

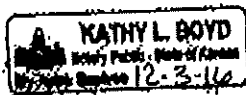
STATE OF KANSAS                     )  
  ) ss.  
COUNTY OF MEADE                 )


**VERIFICATION**

Roger Holmes, being duly sworn upon his oath deposes and says that he is President of Plains Producers Association, Inc., that he has read and is familiar with the foregoing Application, and that the statements contained therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Roger Holmes  
President  
Plains Producers Association, Inc.

Subscribed and sworn to before me this 17<sup>th</sup> day of September, 2014.



  
\_\_\_\_\_  
Notary Public

My Appointment Expires:

12-3-16

## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the above *Application* was served electronically by e-mail, hand-delivered or mailed, postage prepaid, this 17<sup>th</sup> day of September, 2014 to:

JAMES FLAHERTY – COUNSEL FOR BLACK HILLS ENERGY  
ANDERSON & BYRD, L.L.P.  
216 S HICKORY  
PO BOX 17  
OTTAWA, KS 66067

/s/ Terri Pemberton  
TERRI PEMBERTON