

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 of Natural Gas Service.	) ) ) ) ) )	Docket No. 25-BHCG-298-RTS
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DIRECT TESTIMONY OF

**ASHLEY DUBLER**

On behalf of

**Seaboard Energy Kansas, LLC**

May 7, 2025

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

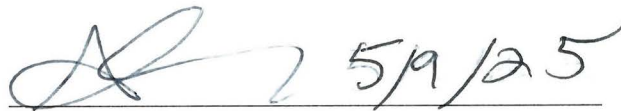
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STATE OF KANSAS            )  
  ) ss:  
COUNTY OF JOHNSON    )

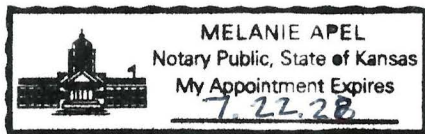
**Affidavit of Ashley Dubler**


Ashley Dubler, being first duly sworn, on her oath states:

1. My name is Ashley Dubler. I am the Vice President and Chief Financial Officer of Seaboard Energy, LLC and its subsidiaries.
2. Attached hereto and made a part hereof for all purposes is my testimony which was prepared in written form for introduction into evidence in Kansas State Corporation Commission Docket No. 25-BHCG-298-RTS.
3. I hereby swear and affirm that the testimony is true and correct and that it shows the matters and things that it purports to show.

  
Ashley Dubler

Subscribed and sworn to before me this 9<sup>th</sup> day of May 2025.



  
Notary Public

1 **Introduction**

2 **Q PLEASE STATE YOUR NAME, YOUR EMPLOYER, AND YOUR**  
3 **EMPLOYMENT POSITION.**

4 A My name is Ashley Dubler, and I am the Vice President and Chief Financial Officer of  
5 Seaboard Energy, LLC and its subsidiaries.

6 **Q IN THIS DOCKET, ARE YOU OFFERING TESTIMONY ON BEHALF OF**  
7 **SEABOARD ENERGY KANSAS, LLC (“SEABOARD”)?**

8 A Yes.

9 **Q PLEASE DESCRIBE SEABOARD’S INTEREST IN THIS MATTER.**

10 A Seaboard is a direct retail, natural gas customer of Black Hills / Kansas Gas Utility  
11 Company LLC (“Black Hills Energy”). Seaboard receives natural gas transportation  
12 service from Black Hills Energy pursuant to a Large Volume Transportation Agreement  
13 (“LVTA”) made effective on October 1, 2020. Black Hills Energy’s proposed increases  
14 will significantly impact Seaboard.

15 **Q PLEASE DESCRIBE THE HISTORY OF SEABOARD’S PLANT IN HUGOTON,**  
16 **KANSAS.**

17 A The Hugoton plant was originally constructed in 2013 by Abengoa Bioenergy Biomass of  
18 Kansas LLC (“Abengoa”) as a cellulosic ethanol plant. Abengoa’s operations began in  
19 early 2015, but they were not successful. Abengoa laid off nearly all of its Hugoton  
20 workforce and entered bankruptcy proceedings. It was acquired by Synata Bio Inc.  
21 (“Synata”). In early 2019, Seaboard acquired the Hugoton facility from Synata. Seaboard  
22 promptly engaged in design and construction work to both convert and add on to the  
23 Hugoton facility to produce renewable diesel fuel.

1   **Q     PLEASE DESCRIBE SEABOARD’S CURRENT OPERATIONS AT THE**  
2   **HUGOTON PLANT.**

3   A     We are currently producing renewable diesel fuel at the design capacity of the plant.  
4         Today, we employ 110 persons in Hugoton, and we have an average of 20 contractors on  
5         site on any given day. We are a major employer in the town of approximately 3,800  
6         people.

7   **Q     PLEASE DESCRIBE THE RENEWABLE FUELS INDUSTRY AND THE**  
8   **IMPACT OF THE PROPOSED UTILITY RATE INCREASE.**

9   A     The economics of producing renewable fuels is challenging. Depending on market  
10        conditions, it is not uncommon for production plants to decide to temporarily suspend or  
11        shut down operations. Seaboard does its best to operate in a highly efficient manner, with  
12        close attention to all costs. To illustrate the impact of Black Hills Energy’s proposed  
13        increases, had they been effective in 2024, Seaboard would have incurred approximately  
14        \$148,000 in increased charges for the year for this one utility expense – natural gas. That  
15        is an increase of approximately 13%, substantially above the rate of inflation. If the cost  
16        increase is approved, it is one that Seaboard will have to absorb, making our operations  
17        more expensive.

18        It is important that Seaboard be economically successful in Hugoton – not only for our  
19        owners, but also for our 110 employees and the Hugoton community. As a part of the  
20        agribusiness community in Kansas, Seaboard is not only a large employer in Hugoton,  
21        but we also purchase supplies from local businesses, we pay local and state taxes, and we  
22        support local charities.

1    **Q     ARE THERE SPECIFIC PARTS OF THIS DOCKET THAT SEABOARD**  
2       **WOULD LIKE TO ADDRESS?**

3    A     Black Hills Energy seeks to lower the daily balancing provision of its tariff in a manner  
4       that Seaboard deems to be unreasonable. Seaboard purchases supply on the pipeline  
5       system of Panhandle Eastern Pipe Line (“PEPL”). Currently, the PEPL system has a 10%  
6       daily balancing provision, and it makes both engineering and operational sense for the  
7       transport (PEPL) and distribution system (Black Hills Energy) to match daily balancing  
8       to be symmetrical. I would add that the Black Hills Energy’s sales function will not be  
9       held to a 5% daily balancing amount on its sales volumes purchases on PEPL.

10   **Q     DOES THIS COMPLETE YOUR TESTIMONY?**

11   A     Yes it does. Thank you.

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of May 2025, the above and foregoing was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list and by U.S. Mail as follows:

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