

**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 ) Docket No. 25-BHCG-298-RTS  
of the Commission to Make Certain Changes )  
in its Rates for Natural Gas Service. )

**PETITION TO INTERVENE**

COMES NOW WoodRiver Energy, LLC (“WoodRiver”) and petitions the Corporation Commission of the State of Kansas (“Commission”) for intervention in the above-captioned case pursuant to K.S.A. 77-521. In support of its petition, WoodRiver states and alleges as follows:

1. On February 3, 2025, Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills Energy (“Black Hills Energy” or “BHE”) filed an application seeking approval to make certain changes in its rates for natural gas service. Black Hills Energy seeks to significantly increase its annual revenues and make certain proposed changes to its gas transportation tariffs.

2. WoodRiver is a privately-owned natural gas marketing company providing reliable natural gas service to school, agricultural, commercial, and industrial natural gas customers throughout Kansas and to neighboring states. WoodRiver has a significant customer base in Kansas and served over 3 Bcf of customer demand served off the BHE jurisdictional gas utility system in 2024.

3. As a supplier on BHE, WoodRiver anticipates that as a result of this proceeding its’ customers may experience changes to the rates and terms of service under which those customers receive service that may be detrimental to them. To the extent rates and terms of

service may change as a part of this proceeding, WoodRiver and its' customers have an immediate interest.

4. WoodRiver's interest in this proceeding is not adequately represented by any other party.

5. WoodRiver meets the standards of K.S.A. § 77-521(b), that permits the presiding officer to "grant a petition for intervention at any time upon determining that the intervention sought is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings" and grants the Commission broad discretion to grant permissive intervention.

6. WoodRiver will accept the record, procedural schedule, and all orders entered in this proceeding to date. Therefore, the intervention will not disrupt or impair the orderly and prompt conduct of the proceedings.

7. All communications and correspondence to WoodRiver, including service of notices and orders of the Commission herein are requested to be sent to the following named individuals:

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<sup>1</sup> Mr. Goldberg is listed as counsel subject to Commission action on his Motion for Admission Pro Hac Vice, which is being filed simultaneously herewith.

WHEREFORE, WoodRiver respectfully requests the Commission enter an Order allowing it to intervene in this proceeding and for all other relief which the Commission deems just and proper.

By: /s/ Jeffrey S. Austin  
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Executed on April 7, 2025.

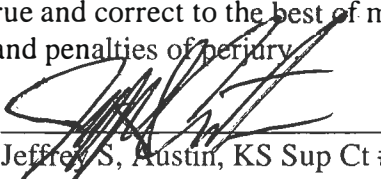
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<sup>2</sup> Mr. Goldberg is listed as counsel subject to Commission action on his Motion for Admission Pro Hac Vice, which is being filed simultaneously herewith.

**VERIFICATION**

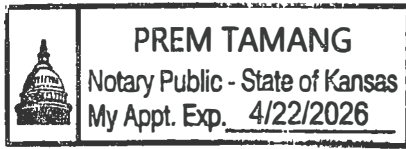
STATE OF KANSAS            )  
  ) ss:  
COUNTY OF JOHNSON        )

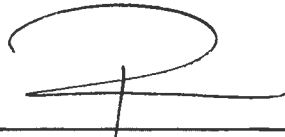
I, Jeff Austin, of lawful age and being first duly sworn upon my oath, state that I am an attorney for WoodRiver Energy, LLC; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief under the pains and penalties of perjury.

  
\_\_\_\_\_  
Jeffrey S. Austin, KS Sup Ct # 13575

Executed on April 7, 2025.

Subscribed and sworn to before me, a Notary Public, this 7th day of April, 2025.



  
\_\_\_\_\_  
Notary

My commission expires: 04/22/2026

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 7th day of April, 2025, addressed to:

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