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 Interstate Natural Gas) Storage and Pipeline Facility in Kiowa County,) Kansas and for Approval of Initial Terms and) Conditions for Services and Rates)

Docket No. 25-GGSG-459-COC

<u>PETITION TO INTERVENE OF EVERGY KANSAS CENTRAL, INC., EVERGY</u> <u>KANSAS SOUTH, INC., AND EVERGY METRO, INC.</u>

COMES NOW Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (together as "Evergy Kansas Central") and Evergy Metro, Inc. ("Evergy Kansas Metro") (collectively as "Evergy") and move the State Corporation Commission of the State of Kansas ("Commission") for an order permitting them to intervene in the above-captioned matter pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support of its petition, Evergy states as follows:

1. On June 3, 2025, Golden Gas Service Company ("GGSC") filed an application for a certificate of convenience and necessity ("CCN") authorizing GGSC to transact business as a natural gas public utility for the purpose of constructing, operating and maintaining an intrastate natural gas storage and pipeline facility located in Kiowa County, Kansas. GGSC also sought approval of its initial general terms and conditions of service and rate tariffs.

2. Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. are corporations duly incorporated under the laws of the State of Kansas and are engaged, among other things, in the business of an electric public utility, as defined by K.S.A. 66-104, in legally designated areas within the State of Kansas. Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. hold certificates of convenience and authority issued by this Commission authorizing them to engage in such utility business.

3. Evergy Kansas Metro is a corporation duly incorporated under the laws of the State of Missouri and is engaged, among other things, in the business of an electric public utility, as defined by K.S.A. 66-104, in legally designated areas within the State of Kansas. Evergy Kansas Metro holds certificates of convenience and authority issued by this Commission authorizing it to engage in such utility business.

4. Evergy Kansas Central provides electric service to approximately 738,635 retail customers within designated areas of the state of Kansas, and Evergy Kansas Metro provides electric service to approximately 305,816 retail customers within designated areas of the state of Kansas. Both companies also provide wholesale service to various municipalities and cooperatives that serve retail customers in Kansas.

5. Evergy Kansas Central operates generating capacity consisting of a combination of nuclear, coal, renewable, natural gas, and oil-fired generation with a total rated capacity of approximately 8,674 MW. The utility owns, operates and controls approximately 73 percent of that generating capacity and takes power subject to performance of third-party entities under power purchase agreements ("PPAs") for the remaining 27 percent.

6. Evergy Kansas Metro operates generating capacity consisting of a combination of nuclear, coal, renewable, natural gas, and oil-fired generation with a total rated capacity of approximately 5,800 MW. The utility owns, operates and controls approximately 80 percent of that generating capacity and takes power subject to performance of third-party entities under power purchase agreements ("PPAs") for the remaining 20 percent.

7. Evergy Kansas Central recently filed an application for predetermination of ratemaking treatment related to its investment in two combined cycle gas turbine ("CCGT") plants that will be located in Kansas and the Commission issued an order approving a non-unanimous

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settlement agreement setting forth such ratemaking treatment on July 7, 2025.¹ Evergy Kansas Central is currently in the process of developing its plan for natural gas transportation and supply for these two facilities and is supportive of GGSC's request for a CCN to develop this project.

8. GGSC's proposed storage field is strategically in a very good location for both Evergy and Kansas Gas Service ("KGS") because Phase I of the project would be interconnected with the KGS and Southern Star pipelines – in fact, the storage field is located at the intersection of several pipeline systems including KGS, Southern Star, Panhandle Eastern, ANR, Cheyenne Plains, and Northern Natural.

9. Phase I of GGSC's proposed project will be an intrastate project, which means that the gas would need to be consumed in Kansas, which is a positive for Evergy Kansas Central and its customers as it develops gas procurement plans for its new CCGT facilities and for Kansas generally by helping to ensure adequate gas supply for all users in the state. Specifically, Phase I is anticipated to be 2.4 Bcf storage capability coming online in 2029, which matches up with the projected in-service date of Evergy Kansas Central's Viola natural gas plant.

10. GGSC currently has a non-binding open season open right now through 7/18/25. To participate in the binding open season later this year, respondents must respond in the nonbinding season. Evergy Kansas Central intends to participate in this process. If Evergy were to procure a portion of this storage field in Phase 1, it would be in the path for both McNew and Viola and could help serve the fuel needs at those sites for the life of the plants. Even if Evergy Kansas Central is not able to secure a portion of the storage field, having this asset in this location on the natural gas pipeline system would be very beneficial in helping to meet the demand of natural gas users in the state of Kansas.

¹ See Docket No. 25-EKCE-207-PRE.

11. Thus, Evergy has a substantial interest in the outcome of this proceeding that cannot be represented by any other entity. GGSC's Application has been on file with the Commission for a little over one month, and no procedural schedule has yet been ordered by the Commission. As such, the interests of justice and the orderly and prompt conduct of these proceedings will not be impaired by allowing Evergy's intervention. Evergy requests that the Commission grant its petition for intervention and make Evergy a party to this docket with the right to participate fully throughout the proceeding.

12. In addition to signatory counsel, communications and correspondence in regard to this application should be addressed to:

Leslie Wines Administrative Assistant, Sr. 818 S. Kansas Ave. Topeka, KS 66612 (785) 575-1584 Leslie.Wines@evergy.com JP Meitner Director, Market Operations 818 S. Kansas Ave. Topeka, KS 66612 (785) 379-4560 James.Meitner@evergy.com

WHEREFORE, Evergy respectfully requests that the Commission issue an order allowing it to intervene and participate in this docket and for such further and other relief as may be appropriate.

Respectfully submitted,

/s/Cathryn J. Dinges

Cathryn J. Dinges (#20848) Senior Director and Regulatory Affairs Counsel 818 South Kansas Avenue Topeka, Kansas 66612 (785) 575-8344 Cathy.Dinges@evergy.com

ATTORNEY FOR EVERGY KANSAS CENTRAL, INC., EVERGY KANSAS SOUTH, INC. AND EVERGY METRO, INC. STATE OF KANSAS) COUNTY OF SHAWNEE)

) ss:

VERIFICATION

The undersigned, Cathryn Dinges, upon oath first duly sworn, states that she is Senior Director and Regulatory Affairs Counsel for Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., that she has reviewed the foregoing pleading, that she is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of her knowledge and belief.

Cathyn Kingas Cathryn J. Dinges

Subscribed and sworn to before me this 14th day of July, 2025.

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My Appointment Expires: May 30,2026

NOTARY PUBLIC - State of Kansaa LESLIE R. WINES MY APPT. EXPIRES 5/30/2026

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed, this 14th day of July 2025, to all parties of record as listed below:

ALAN R. STAAB, President Golden Gas Service Company 2502 East 21st Street Suite B Tulsa, OK 74114 <u>astaab@ggsctulsa.com</u>

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> <u>/s/ Cathryn J. Dinges</u> Cathryn J. Dinges