

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Joint Application of American )  
Energies Gas Service, LLC/American Energies )  
Pipeline, LLC and Kansas Gas Service, a Division )  
of ONE Gas, Inc. for an Order Approving the )  
Transfer to Kansas Gas Service Certificates of )  
Convenience and Necessity with Respect to )  
AEGS's Natural Gas Utility Business and AEPL's )  
Pipeline Facilities Located in Harvey, Marion, and )  
McPherson Counties, Kansas to Provide Utility )  
Service and for Other Related Relief. )

Docket No. 24-KGSG-284-ACQ

**MOTION FOR PROCEDURAL SCHEDULE**

American Energies Gas Service, LLC ("AEGS"), American Energies Pipeline, LLC ("AEPL"), and Kansas Gas Service, a Division of ONE Gas, Inc. ("Kansas Gas Service") request the Kansas Corporation Commission ("Commission") grant this Motion for Procedural Schedule ("Motion"). In support of this Motion, AEGS, AEPL and Kansas Gas Service state as follows:

1. On September 22, 2023, AEGS, AEPL and Kansas Gas Service filed an Application for the Transfer and Sale of Public Utility Certificates and Assets with the Commission ("Application"). The Application sought an Order from the Commission,

i. approving the transfer from AEGS to Kansas Gas Service certificates of convenience and necessity to operate as a natural gas public utility;

ii. approving the Asset Purchase Agreement dated June 22, 2023 ("APA") entered into by the Joint Applicants, and authorizing the transfer and sale from AEGS and AEPL to Kansas Gas Service the Assets used to provide utility service to customers located in Harvey, Marion, and McPherson County, Kansas;

iii. authorizing Kansas Gas Service to, generally, use its Commission-approved rates and general terms and conditions for AEGS's customers;

iv. authorizing Kansas Gas Service to implement a new wholesale transportation rate for service provided to the City of Hesston, Kansas;

v. authorizing Kansas Gas Service to exempt AEGS's customers from Kansas Gas Service's Winter Event Securitized Cost Recovery Rider, and instead authorize Kansas Gas Service to assume and continue the remainder of AEGS's 2021 Winter Weather Event Rider;

vi. authorizing AEGS to convert five (5) existing customers served by AEGS to propane service because the cost to replace the AEPL pipeline facilities used to serve those customers is uneconomical;

vii. authorizing AEGS and AEPL to cease providing natural gas public utility service to customers in Kansas upon the transfer of AEGS's certificates of convenience and necessity, AEPL's pipeline facilities, and AEGS/AEPL's obligations and responsibilities as a public utility to Kansas Gas Service;

viii. authorizing Kansas Gas Service, for accounting and ratemaking purposes, to record the purchase price of the AEGS/AEPL system assets at the net book value of the Assets; and

ix. for such other relief that is found to be necessary by the Commission as just and reasonable in this matter.

2. On October 26, 2023, the Commission issued an order granting the Citizens' Utility Ratepayer Board's ("CURB") petition to intervene; a Protective Order and a Discovery Order.

3. AEGS, AEPL, Kansas Gas Service, Staff and CURB (collectively referred to as the "Parties") have discussed a proposed procedural schedule in this docket and were able to reach agreement on a schedule that could be recommended to the Commission for its review and approval. The proposed schedule proposes two tracts. The first tract would be used if the Parties are able to enter into a settlement agreement following the issuance of Staff's Report and Recommendation ("R&R"). The second tract would be used if the Parties are unable to enter into a settlement agreement following the issuance of Staff's R&R.

4. The proposed procedural schedule is as follows:

**TRACK ONE: R&R & SETTLEMENT**

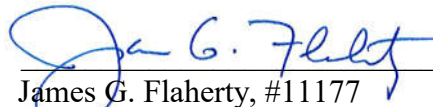
Filing Date:	Sept. 22, 2023
Staff R&R due:	Feb. 19, 2024 (150 days after filing)

Responses to Staff R&R:	Mar. 8, 2024
Settlement Conference:	Mar. 19-20, 2024
Settlement Filing:	Mar. 29, 2024
Testimony in Support/Opposition:	Apr. 12, 2024
Settlement Hearing (if necessary):	Apr. 23, 2024
Commission Order:	May 23, 2024

**TRACK TWO: LITIGATED HEARING**

Staff R&R due:	Feb. 19, 2024 (150 days after filing)
Responses to Staff R&R:	Mar. 8, 2024
Settlement Conference:	Mar. 19-20, 2024
Staff and Intervenor Testimony:	Apr. 8, 2024
Rebuttal Testimony:	Apr. 17, 2024
Prehearing Conference:	May 3, 2024
Evidentiary Hearing:	May 7-8, 2024
AEGS, AEPL, KGS Initial Brief:	May 22, 2024
Staff and Intervenor Briefs:	June 5, 2024
AEGS, AEPL, KGS Rebuttal Brief:	June 12, 2024
Commission Order:	July 11, 2024

WHEREFORE, AEGS, AEPL, and Kansas Gas Service request the Commission issue an Order approving the proposed procedural schedule set forth herein.



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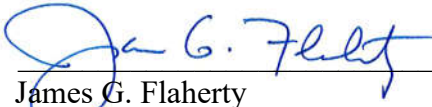
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**VERIFICATION**

STATE OF KANSAS  
COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states:

That he is the attorney for American Energies Gas Service, LLC/American Energies Pipeline, LLC named in the foregoing Motion for Procedural Schedule and is duly authorized to make this affidavit; that he has read the foregoing and knows the contents thereof; and that the facts set forth therein are true and correct.

  
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James G. Flaherty

SUBSCRIBED AND SWORN to before me this 4<sup>th</sup> of January, 2024.



  
\_\_\_\_\_

Notary Public

Appointment/Commission Expires:

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 4<sup>th</sup> day of January, 2024, addressed to:

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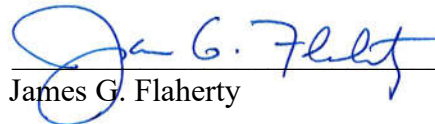
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