## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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In the Matter of the Recommendation to Initiate A Show Cause Proceeding as to why Sundowner, Inc. should not be Required to Obtain a Certificate of Public Convenience and Necessity to Operate as a Potable Water Utility, and an Emergency Order Enforcing Cold Weather Rules for Meter Disconnections within Sundowner, Inc.'s Water Distribution System.

Docket No. 24-SUNW-590-SHO

## NOTICE OF SERVICE OF DISCOVERY RESPONSES

COMES NOW Sundowner, Inc. ("Sundowner"), and hereby notifies the State Corporation Commission of the State of Kansas that it has submitted responses to Discovery Request Nos. 40 and 41 issued by the Kansas Corporation Commission on June 12, 2025.

Respectfully submitted,

Maly F. Morgan, #29683 C. Edward Watson, II #23386 FOULSTON SIEFKIN LLP 1551 N. Waterfront Parkway, Suite 100 Wichita, KS 67206-4466 316.267.6371 (office) 316.267.6345 (fax) Attorneys for Sundowner, Inc.

## VERIFICATION

STATE OF KANSAS ss: COUNTY OF SEDGWICK

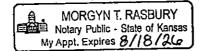
Molly E. Morgan, of lawful age, being first duly sworn, on oath deposes and states:

I am an attorney for Sundowner, Inc. in the above-referenced matter. I have read the above and foregoing document, know and understand the contents thereof, and verify that the statements and allegations contained therein are true and correct, according to my knowledge, information and belief.

Subscribed and sworn to before me this  $26^{th}$  day of June, 2025.

Notary Public Rustruez

My appointment expires: 08/18/2026



## CERTIFICATE OF SERVICE

I, the undersigned, certify that a true copy of the attached Notice of Service of Discovery Responses has been served to the following by means of electronic service on June 26, 2025.

C. Edward Watson II, Attorney Foulston Siefkin LLP 1551 N. Waterfront Pkwy, Ste 100 Wichita, KS 67206-446 <u>cewatson@foulston.com</u>

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