

6. Staff makes this request because Staff is currently awaiting corrected Transmission Level Service data from Southern Pioneer—that Staff anticipates receiving today, April 2, 2024.

Once Staff receives the corrected data, Dr. Glass will reasonably need additional time to evaluate the corrected data and then supplement his Direct Testimony.

7. Staff has consulted with Southern Pioneer, CURB, National Beef, and Air Products in anticipation of filing this Motion and all parties have represented they have no objection to Staff's request so long as each of the following adjustments to the procedural schedule are adopted:

- (a) Cross-Answering Testimony is due by 5:00 p.m. on April 12, 2024; and
- (b) Southern Pioneer Rebuttal Testimony is due by 5:00 p.m. on May 3, 2024.

In view of the foregoing, Staff respectfully moves the Commission for leave to file Supplemental Direct Testimony of Robert H. Glass, Ph.D no later than April 9, 2024, and adopt the procedural schedule adjustments as stated in Paragraph 7.

Respectfully submitted,

/s/ Kyler C. Wineinger

Kyler C. Wineinger, #28518

Litigation Counsel

Kansas Corporation Commission

1500 SW Arrowhead Road

Topeka, Kansas 66604-4027

Phone: (785) 271-3109

k.wineinger@kcc.ks.gov

## **CERTIFICATE OF SERVICE**

24-SPEE-415-TAR

I, the undersigned, certify that a true and correct copy of the above and foregoing Staff's Motion for Leave was served via electronic service this 2nd day of April, 2024, to the following:

JOSEPH R. ASTRAB, ATTORNEY  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
j.astrab@curb.kansas.gov

TODD E. LOVE, ATTORNEY  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
t.love@curb.kansas.gov

DAVID W. NICKEL, CONSUMER COUNSEL  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
d.nickel@curb.kansas.gov

SHONDA RABB  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
s.rabb@curb.kansas.gov

DELLA SMITH  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
d.smith@curb.kansas.gov

JAMES P ZAKOURA, ATTORNEY  
FOULSTON SIEFKIN LLP  
7500 COLLEGE BOULEVARD, STE 1400  
OVERLAND PARK, KS 66201-4041  
jzakoura@foulston.com

JEFFRY POLLOCK  
J. POLLOCK, INCORPORATED  
14323 South Outer 40 Rd.  
Ste. 206N  
Town and Country, MO 63017-5734  
jcp@jpollockinc.com

BRIAN G. FEDOTIN, GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
b.fedotin@kcc.ks.gov

CARLY MASENTHIN, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
c.masenthin@kcc.ks.gov

KYLER C. WINEINGER, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
k.wineinger@kcc.ks.gov

## **CERTIFICATE OF SERVICE**

24-SPEE-415-TAR

TREVOR WOHLFORD, ATTORNEY  
MORRIS LAING EVANS BROCK & KENNEDY  
800 SW JACKSON  
SUITE 1310  
TOPEKA, KS 66612-1216  
twohlford@morrislaing.com

GLEND A CAFER, MORRIS LAING LAW FIRM  
MORRIS LAING EVANS BROCK & KENNEDY CHTD  
800 SW JACKSON STE 1310  
TOPEKA, KS 66612-1216  
gcafer@morrislaing.com

BRIAN BEECHER, OPERATIONS AND ENGINEERING  
MANAGER  
SOUTHERN PIONEER ELECTRIC COMPANY  
3997 NE WELL ROAD  
PO BOX 347  
MEDICINE LODGE, KS 67104  
bbeecher@southernpioneer.net

LINDSAY CAMPBELL, INTERIM PRESIDENT & CEO  
SOUTHERN PIONEER ELECTRIC COMPANY  
1850 W OKLAHOMA  
PO BOX 430  
ULYSSES, KS 67880-0368  
lcampbell@pioneerelectric.coop

LARISSA LAYMAN, LEGAL EXECUTIVE ASSISTANT  
SOUTHERN PIONEER ELECTRIC COMPANY  
1850 W OKLAHOMA  
PO BOX 430  
ULYSSES, KS 67880-0368  
llayman@pioneerelectric.coop

RICHARD J MACKE, VP - ECONOMICS, RATES, AND  
BUSINESS PLANNING DPT.  
SOUTHERN PIONEER ELECTRIC COMPANY  
10710 Town Square Dr NE Ste 201  
Minneapolis, MN 55449  
rmacke@powersystem.org

CLINT MEIER, VP - ENGINEERING AND OPERATIONS  
SOUTHERN PIONEER ELECTRIC COMPANY  
1850 WEST OKLAHOMA  
PO BOX 403  
ULYSSES, KS 67880  
cmeier@pioneerelectric.coop

CHANTRY SCOTT, INTERIM ASST CEO & CFO  
SOUTHERN PIONEER ELECTRIC COMPANY  
1850 WEST OKLAHOMA  
PO BOX 403  
ULYSSES, KS 67880  
cscott@pioneerelectric.coop

*Ann Murphy*

---

Ann Murphy