

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Complaint of The)
Citizens' Utility Ratepayer Board Against)
Kansas Electric, Natural Gas, Water, and)
Telecommunications Public Utilities) Docket No. 18-GIMX-273-COM
Regarding Federal Income Tax Reform of)
2018 and Its Effect on Jurisdictional Retail)
Utility Rates.)

JOINT MOTION FOR EXTENSION OF TIME FOR RESPONSE

COMES NOW the Citizens' Utility Ratepayer Board ("CURB") and the telecommunications public utilities identified in Attachment A (the "Movant Telcos," together the "Joint Movants") and request that the Kansas Corporation Commission ("Commission") grant to the Movant Telcos an extension, pursuant to Kansas Administrative Regulations ("K.A. R.") 82-1-217(b), of the ten-day period required for response to CURB's Complaint under K.A.R. 82-1-220(c). In support thereof the Joint Movants state as follows:

1. On December 29, 2017, CURB filed a Complaint alleging some regulated utilities operating in Kansas were maintaining consumer utility rates that would become unjust and unreasonable "upon the effectiveness of reduced federal income tax rates" due to the Tax Cuts and Jobs Act. CURB requested that the Commission "act promptly to ensure customers are not charged for these substantial costs related to income taxes, which are currently included in rates, but will not be incurred by the utilities."

2. CURB's Complaint addresses and categorizes certain groups of telecommunications utilities that are not and should not be considered subjects of the Complaint or made Respondents thereto; the Complaint, however, did not identify by name those telecommunications utilities intended to be excluded.

3. On March 6, 2018, the Commission issued an Order in this proceeding finding that CURB's complaint set out a prima facie case and ordering service of the Complaint "upon all regulated electric, natural gas, water, and telecommunications public utilities operating in Kansas."

4. The Order for service of the Complaint on all of the Movant Telcos has resulted in uncertainty, whether or not any individual Movant Telco has yet received such service, regarding which of them is or will be a Respondent under an obligation to file a response within ten days of service under K.A.R. 82-1-220(c).

5. The Joint Movants have discussed the potential for uncertainty and have agreed voluntarily to exchange information sufficient to permit a determination as to which of the Movant Telcos are properly subject to the Complaint and under a duty to respond thereto.

6. Identification of those Movant Telcos not properly subject to the Complaint will avoid unnecessary administrative effort and expense while allowing CURB to pursue its Complaint against the remaining Movant Telcos. Further, such identification will permit those Movant Telcos, many of which utilize common legal counsel, to respond effectively to the Complaint. The requested extension therefore

would advance the public interest in just regulation without unnecessary effort and expense.

7. The foregoing facts constitute good cause under K.A.R. 82-1-217(b) for the Commission to expand the time otherwise permitted under K.A.R. Section 82-1-220(c) for response to a complaint.

WHEREFORE, the Joint Movants request an Order of the Commission granting an extension of 60 days for specific identification by CURB of those Movant Telcos properly subject to CURB's complaint, and that upon such determination those Movant Telcos thereby identified as subject to the Complaint be afforded an additional ten days to respond thereto.

Respectfully submitted,



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Wheat State Telephone, Inc.

and affiliated carriers (see Attachment A)

VERIFICATION

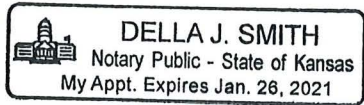
STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, David W. Nickel, of lawful age, being first duly sworn upon oath state:
I am an attorney for the Citizens' Utility Ratepayer Board, that I have read the
above and foregoing document, and upon information and belief, state that the matters
therein appearing are true and correct.



David W. Nickel

SUBSCRIBED AND SWORN to before me this 13th day of March, 2018.





Notary Public

My Commission Expires: 01-26-2021

ATTACHMENT A
MOVANT TELCOS

I. Independent Telecommunications Group and affiliates:

Columbus Communications Services, LLC	Moundridge Telephone Co., Inc.
Cunningham Telephone Co., Inc.	Total Communications, Inc.
Gorham Telephone Co. Inc.	Twin Valley Telephone, Inc.
H & B Communications, Inc.	Wamego Telecommunications Co., Inc.
Home Telephone Co., Inc.	Wilson Telephone Co., Inc.
LaHarpe Telephone Co. Inc.	Zenda Telephone Co., Inc.
Optic Communications, LLC	Twin Valley Communications, Inc.
Cunningham Communications, Inc.	WTC Communications, Inc.
H&B Cable Service, Inc.	WTC Technologies, Inc.
Home Communications, Inc.	Wilson Communications, Inc.

II. State Independent Alliance and affiliates:

Blue Valley Tele-Communications, Inc.	The Pioneer Telephone Association, Inc.
One Point Technologies, Inc.	High Plains Telecommunications, Inc.
Craw-Kan Telephone Cooperative, Inc.	Rainbow Telecommunications
Golden Belt Telephone Association, Inc.	Association, Inc.
GBT Communications, Inc.	Rainbow Communications, Inc.
Haviland Telephone Company, Inc.	S&A Telephone Company, Inc.
J.B.N. Telephone Company, Inc.	The S&T Telephone Cooperative
Giant Communications, Inc.	Association, Inc.
KanOkla Telephone Association	S&T Communications, LLC
KanOkla Communications, Inc.	South Central Telephone Association
Madison Telephone, LLC	South Central Wireless, Inc.
MT Networks, LLC	The Tri-County Telephone Association,
MoKan Dial, Inc.	Inc.
MoKan Communications, Inc.	United Telephone Association, Inc.
Peoples Telecommunications, LLC	United Wireless Communications, Inc.
Peoples Services, LLC	

III. Additional Movant Telcos:

Southern Kansas Telephone Co., Inc. and its affiliates:

Southern Kansas Telephone Co., Inc. d/b/a SKT WorldLink
SKT, Inc.

Mutual Telephone Company and its affiliate:

LR Communications, Inc. d/b/a MTC
Rural Telephone Service Co., Inc. d/b/a Nex-Tech and its affiliate:
Nex-Tech, LLC
Wheat State Telephone Company, Inc.

Midcontinent Communications, a South Dakota general partnership, d/b/a Midco

CERTIFICATE OF SERVICE

18-GIMX-273-COM

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 13th day of March, 2018, to the following:

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