

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of a General Investigation )  
Regarding the Acceleration of Replacement of )  
Natural Gas Pipelines Constructed of Obsolete ) Docket No. 15-GIMG-343-GIG  
Materials Considered to be a Safety Risk. )

**MOTION OF KANSAS GAS SERVICE  
FOR AN EXPANSION OF TIME TO FILE COMMENTS TO  
STAFF'S MEMORANDUM**

Kansas Gas Service, Inc., a Division of ONE Gas, Inc., ("KGS" or "Company") hereby files the following Motion for Expansion of Time to File Comments to Staff's Memorandum filed in this docket on December 19, 2018 ("Memorandum"). In support of this request, KGS states as follows:

1. On September 12, 2017, the Kansas Corporation Commission ("Commission") issued its Final Order in the above referenced docket ("343 Docket") wherein the Commission ordered the three natural gas utilities to develop plans for the systematic accelerated replacement of all of their bare steel service/yard lines, cast iron mains, and all bare steel mains within Class 3 locations. Each plan was to be filed within the 6 months of the Order.
2. Following the issuance of the Order, Staff met with each natural gas utility to reach agreement as to the requirements of the contents of each utility's plan. On April 24, 2018, Kansas Gas Service filed its *Final Plan for Replacement of Obsolete Materials in Populated Areas*.
3. On Friday, December 19, 2018, Staff filed its Memorandum reporting its progress in complying with the Final Order in the docket and included Staff's recommendations.

4. Due to the intervening holiday season and current work load, KGS now seeks an extension of time to consider Staff's Memorandum and to submit its Comments. Specifically, KGS requests until January 25, 2019 to file its response to Staff's Memorandum.

WHEREFORE, Kansas Gas Service respectfully requests the Commission grant the Company an extension until January 25, 2019, to prepare and file a response to Staff's Memorandum in this matter.

Respectfully Submitted,

A handwritten signature in blue ink, reading "Judy Jenkins Hitchye", is written over a horizontal line.

Judy Jenkins Hitchye, KS Supr. Ct. #23300  
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## VERIFICATION

STATE OF KANSAS       )  
                                  )  
COUNTY OF JOHNSON   )

I, Judy Jenkins Hitchye, of lawful age, being first duly sworn upon oath, states as follows: I am a Managing Attorney for Kansas Gas Service, a Division of ONE Gas, Inc. I have read the above *Motion for an Expansion of Time to File Comments to Staff's Memorandum* and all the statements therein are true to the best of my knowledge, information and belief.

  
Judy Jenkins Hitchye

*Affiant*

SUBSCRIBED AND SWORN to before me on 1/3/2019.

  
Notary public

My Appointment Expires:

04/05/2022



**CERTIFICATE OF SERVICE**

I, Judy Jenkins Hitchye, hereby certify that a copy of the above and foregoing *Motion for an Expansion of Time to File Comments to Staff's Memorandum* was forwarded this 3<sup>rd</sup> day of January, 2019, addressed to:

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