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

In the Matter of a General Investigation of Atmos Energy to Show Cause Why this Commission Should Not Impose Penalties or Sanctions for Violation of the Natural Gas Pipeline Safety Statutes, Rules, and Regulations

Docket No. 14-ATMG-508-SHO

# **MOTION FOR EXTENSION OF TIME TO FILE RESPONSE**

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Atmos Energy ("Atmos") moves for an extension of time to file its response to the Report and Recommendation filed herein on May 5, 2014, by the Staff of the Kansas Corporation Commission ("Staff" and "Commission," respectively). Staff recommended the Commission require Atmos to show cause why it should not be assessed a penalty in the amount of \$72,000 for failure to comply with Kansas pipeline safety regulations. A response to Staff's Report and Recommendation is due June 2, 2014.

Atmos and Staff are currently involved in discussions regarding a proposed consent decree in this docket. Atmos requests it be granted additional time, or until June 16, 2014, in which to respond to Staff's Report and Recommendation. Staff has no objection to Atmos' request for extension of time.

WHEREFORE, Atmos moves the Commission for an Order granting it additional time, or until June 16, 2014, to respond to Staff's Report and Recommendation.

James G. Flaherty, #11177 ANDERSON & BYRD, LLP 216 S. Hickory, P. O. Box 17 Ottawa, Kansas 66067 (785) 242-1234, telephone (785) 242-1279, facsimile jflaherty@andersonbyrd.com Attorneys for Atmos Energy

#### **VERIFICATION**

#### STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being duly sworn upon oath, deposes and says that he is attorney for Atmos Energy that he has read the above and foregoing Motion for Extension of Time to File Response, and the statements contained therein are true.

James G. Flahe

SUBSCRIBED AND SWORN to before me this 2<sup>nd</sup> day of June, 2014.



ISAN CE

Notary Public

Appointment/Commission Expires:

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was mailed, postage prepaid, this 2<sup>nd</sup> day of June, 2014, addressed to:

Robert A. Fox Senior Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604-4027

James G. Flaherty