

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

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)	Docket No. 24-SUNW-590-SHO
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.)	

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 No. 31 issued by the Kansas Corporation Commission on November 14, 2024.

Respectfully submitted,




C. Edward Watson, II #23386
Molly E. Morgan, #29683
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.



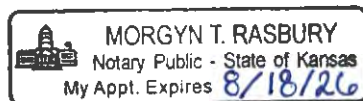
C. Edward Watson, II

Subscribed and sworn to before me this 9th day of July, 2025.



Notary Public

My appointment expires: 8/18/26



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 July 9, 2025.

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

Molly E. Morgan, Attorney
Foulston Siefkin LLP
1551 N. Waterfront Parkway
Suite 100
Wichita, KS 67206
mmorgan@foulston.com

Aaron Bailey, Assistant General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604
aaron.bailey@ks.gov

Carly Masenthin, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604
c.masenthin@kcc.ks.gov

Brian G. Fedotin, General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604
b.fedotin@kcc.ks.gov

Scott Kolling
Sundowner, Inc.
7592 Remington Rd.
Salina, KS 67401
स्कolling64@gmail.com



C. Edward Watson, II #23386