

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

EarthGrid PBC Application for Certificate of)
Convenience and Authority to Provide Local) Docket No. 24-EGPT-337-COC
Exchange and Exchange Access Services within)
the State of Kansas (CLEC).)

MOTION TO EXTEND STATUTORY DEADLINE

Staff of the Kansas Corporation Commission (Staff and Commission, respectively) hereby respectfully moves the Commission to issue an Order extending the statutory deadline in the above-captioned matter from Wednesday, April 10, 2024 to Tuesday, July 9, 2024. In support of the Motion, Staff states the following:

1. On October 13, 2023, Earthgrid PBC (Earthgrid) filed its Application in this docket seeking a Certificate of Convenience and Authority to provide local exchange and exchange access services within the State of Kansas.

2. Commission Staff (Staff), in reviewing Earthgrid's Application, determined it required more time to allow for a sufficient review so that it could issue its Report and Recommendation to the Commission. Staff and Earthgrid discussed an extension to the statutory deadline in this matter and determined an additional ninety (90) days would be sufficient for Staff to complete its review and issue its findings.

3. Staff and Earthgrid agreed to the extension on March 25, 2024 via electronic correspondence, which is available upon request.

4. Staff requests the Commission issue an Order extending the statutory deadline in this matter by ninety days, from Wednesday, April 10, 2024 to Tuesday, July 9, 2024.

WHEREFORE, Staff respectfully requests the Commission grant this Motion by issuing an order that extends the statutory deadline in this matter by ninety days from April 10, 2024 to July 9, 2024.

Respectfully submitted,

/s/ Ahsan A. Latif

Ahsan A. Latif #24709

Litigation Counsel

Kansas Corporation Commission

1500 S.W. Arrowhead Road

Topeka, Kansas 66604

Telephone (785) 271-3118

a.latif@kcc.ks.gov

CERTIFICATE OF SERVICE

24-EGPT-337-COC

I, the undersigned, certify that a true and correct copy of the above and foregoing Motion to Extend Statutory Deadline was served via electronic service this 27th day of March, 2024, to the following:

SCOTT LANE, CHIEF OPERATIONS OFFICER
EARTHGRID PBC
2625 ALCATRAZ AVENUE STE 111
BERKELEY, CA 94705
scott@earthgrid.io

SHARON WARREN, CONSULTANT
INTESERRA CONSULTING GROUP
151 SOUTHHALL LN
STE 450
MAITLAND, FL 32751-7101
swarren@inteserra.com

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
a.latif@kcc.ks.gov

/s/ Ann Murphy

Ann Murphy