

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

In the matter of the application of Quito,)	Docket Nos: 22-CONS-3115-CMSC
Inc. ("Operator") for an operator's license)	
renewal.)	CONSERVATION DIVISION
_____)	License No: 33594

REQUEST FOR HEARING

Comes now Quito, Inc. ("Operator" and "Applicant"), by and through its attorney, John R. Horst, and requests a hearing in connection with the Order Denying Application for License that was issued by the Commission in this docket on September 2, 2021.

In support of its Request for Hearing, Quito, Inc., submits the following:

The Commission's Order is based upon an incorrect construction of K.S.A. 55-155, and is in violation of 11 U.P.C. §525(a).

WHEREFORE, Quito, Inc. requests that this matter be set for hearing, and for such additional relief as the Commission finds just and equitable.

SUBMITTED BY:

JOHN R. HORST, P.A.


By 

JOHN R. HORST
207 W. FOURTH AVE.
P.O. BOX 560
CANEEY, KS 67333
jrhurst48@yahoo.com
Attorney for Quito, Inc.
Our File #2844
S. Ct. #09412

STATE OF KANSAS)
)SS:
COUNTY OF MONTGOMERY)

John R. Horst, of lawful age, being first duly sworn, upon his oath states:

That he is the attorney for Quito, Inc., above-named; that he has read and signed the foregoing document; and that the statements therein contained are true and correct according to his knowledge, information, and belief.



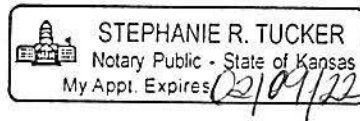
John R. Horst

Subscribed and sworn to before me this 15th day of September, 2021.



NOTARY PUBLIC

My Appointment Expires:



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 15th day of September, 2021, the above and foregoing Request for Hearing was electronically filed and a copy emailed to:

Kelcey Marsh, Litigation Counsel
Kansas Corporation Commission
Central Office
266 N. Main St, Ste 220
Wichita, KS 67202-1513
Fax: 785-271-3354
k.marsh@kcc.ks.gov



JOHN R. HORST