BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

)

)

)

)

)

)

)

In the Matter of the Application of Kansas Gas Service, a Division of ONE Gas, Inc. for Approval of an Accounting Order to Track Expenses Associated with the Investigating, Testing, Monitoring, Remediating, and Other Work Performed at the Manufactured Gas Plant Sites Managed by Kansas Gas Service

Docket No. 17-KGSG-455-ACT

MOTION FOR LEAVE TO FILE OUT OF TIME

The Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) submits this Motion for Leave to File Out of Time:

1. On June 5, 2025, the Commission issued its *Order Cancelling Remaining Procedural Schedule and Render a Decision on Paper Record* in the instant docket, which established that the Commission's decision would be rendered on the administrative record as it stood, with the exception of Settlement Testimony, due today, June 5, 2025.

2. The Staff witness integral to the filing of Settlement Testimony was engaged in business related to another procedure before the Commission on June 5, 2025, as well as heavily engaged in preparation for a major filing date in another matter in the days leading up to June 5, 2025. The press of other business has rendered Staff unable to meet the June 5, 2025, deadline for Settlement Testimony in this matter.

3. Staff respectfully requests leave to file Settlement Testimony out-of-time by end of day on Friday, June 6, 2025.

4. Staff has discussed its motion with each of the other parties to this docket, Kansas Gas Service, a Division of ONE Gas, Inc., and the Citizens' Utility Ratepayer Board. Neither party objected to Staff's Motion.

WHEREFORE, Staff respectfully requests the Commission grant it a one-day extension, from June 5, 2025 to June 6, 2025, to file its Settlement Testimony in the above-captioned matter.

Respectfully submitted,

<u>|s| Carly R. Masenthin</u>

Carly R. Masenthin, #27944 Senior Litigation Counsel Office of Litigation Counsel 1500 SW Arrowhead Rd Topeka, KS 66604 Phone (785) 271-3265 Email: Carly.Masenthin@ks.gov

CERTIFICATE OF SERVICE

17-KGSG-455-ACT

I, the undersigned, certify that a true and correct copy of the above and foregoing motion was electronically delivered this 5th day of June, 2025, to the following:

JOSEPH R. ASTRAB, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 joseph.astrab@ks.gov

LORNA EATON, MANAGER OF RATES AND REGULATORY AFFAIRS KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC. 7421 W 129TH STREET OVERLAND PARK, KS 66213 Iorna.eaton@onegas.com

TODD E. LOVE, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 todd.love@ks.gov

SHONDA RABB CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 shonda.rabb@ks.gov AARON BAILEY, ASSISTANT GENERAL COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 aaron.bailey@ks.gov

JAMES G. FLAHERTY, ATTORNEY ANDERSON & BYRD, L.L.P. 216 S HICKORY PO BOX 17 OTTAWA, KS 66067-0017 jflaherty@andersonbyrd.com

CARLY MASENTHIN, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 carly.masenthin@ks.gov

DELLA SMITH CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 della.smith@ks.gov

Abigail mery

Abigail D. Emery