

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

Received  
on

**JAN 13 2012**

In the Matter of the Complaint of  
Coffeyville Resources Refining &  
Marketing, LLC Against Mid-America  
Pipeline Company, LLC

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Docket No. 12-MDAP-488-COM

by  
State Corporation Commission  
of Kansas

**MOTION OF MID-AMERICA PIPELINE COMPANY, LLC FOR EXTENSION OF  
TIME TO FILE RESPONSE**

Mid-America Pipeline Company, LLC ("MAPL"), hereby moves the State Corporation Commission of the State of Kansas (Commission) for an extension of time in which to file its response in the above-captioned matter. In support of its Motion, MAPL states the following:

1. On January 3, 2012, Coffeyville Resources Refining & Marketing, LLC ("CRRM") filed a complaint against MAPL with the Commission.
2. On January 4, 2012, the Commission initiated this docket and mailed a copy of the complaint to MAPL via certified mail.<sup>1</sup>
3. K.A.R. 82-1-220(c) provides, in part "[i]f the commission determines that the formal complaint...establishes a prima facie case...each public utility...shall be served by the commission a true copy of the formal complaint, and the respondent...shall either satisfy the matter complained of or file a written answer within 10 days."
4. Further, for the purposes of computing time by which a response is due, K.A.R. 82-1-217(c) provides, in part, that "[t]hree days shall be added to the prescribed period for any action required of the recipient" when service is by mail. Therefore, based on a January 4, 2012

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<sup>1</sup> The complaint was actually received by MAPL's in-house counsel, Patricia Totten, on January 10, 2012.

mailing date, and adding three days for mail time, MAPL's response to CRRM's complaint is due on January 17, 2012.

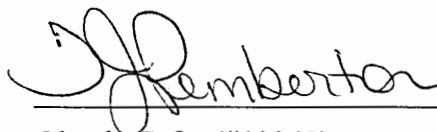
5. However, on January 11, 2012, MAPL and CRRM met for settlement discussions pursuant to the Commission's September 28, 2011 procedural order in Docket No. 12-MDAP-068-RTS ("068 Docket"). As a result of those settlement discussions, and in order to facilitate ongoing negotiations, the parties to that docket are concurrently filing with this motion a Joint Motion to Modify Procedural Schedule requesting, among other things, that the Commission "stay all Commission action with regard to any and all prior motions pending before the Commission as of January 12, 2012."

6. This docket and the 068 docket concern the same pipeline assets and the same parties. Because those parties are involved in ongoing settlement negotiations that may resolve all disputes between MAPL and CRRM, MAPL respectfully requests it be allowed to file its response in this case on March 26, 2012.

7. MAPL has notified CRRM and Commission Staff of its intent to seek an extension until March 26, 2012 to file a response to the CRRM complaint and both parties indicated that they have no objection to the request.

WHEREFORE, MAPL respectfully request the Commission grant this Motion, thereby allowing MAPL to file its response in this matter on March 26, 2012.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Terri Pemberton", is written over a horizontal line.

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**ATTORNEYS FOR MID-AMERICA PIPELINE  
COMPANY, LLC**

## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above *Motion for Extension of Time* was electronically served, hand-delivered or mailed, postage prepaid, this 13<sup>th</sup> day of January, 2012 to:

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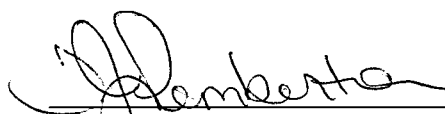
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