

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Dwight D. Keen, Chair
 Shari Feist Albrecht
 Susan K. Duffy

IN THE MATTER OF THE FAILURE OF) DOCKET NO. 19-CONS-3271-CPEN
QUITO, INC. ("OPERATOR") TO COMPLY)
WITH K.A.R. 82-3-111 AT THE SOLOMON) CONSERVATION DIVISION
#3 AND SOLOMON #5 IN CHAUTAUQUA)
COUNTY, KANSAS.) LICENSE NO. 33594

IN THE MATTER OF THE FAILURE OF) DOCKET NO. 19-CONS-3272-CPEN
QUITO, INC. ("OPERATOR") TO COMPLY)
WITH K.A.R. 82-3-111 AT THE DOTY #3 IN) CONSERVATION DIVISION
CHAUTAUQUA COUNTY, KANSAS.)
LICENSE NO. 33594

MOTION TO COMPEL

COMES NOW Quito, Inc., and files its Motion to Compel in these dockets. In support of its Motion to Compel, Quito, Inc., submits the following:

1. The Commission Staff has yet to provide any information in response to Data Request No. 2.
2. It is will be impossible to prepare for hearing without having received that information, which was requested of Commission Staff by Quito, Inc., on June 4, 2019, and which has not been objected to to date.
3. In light of the procedural schedule ordered herein, Quito, Inc., is required to file its Motion to Compel in the referenced dockets.

WHEREFORE, Quito, Inc., requests that the Commission Staff be forced to comply with Data Request No. 2, and for such additional and further relief as the Commission may find appropriate.

Respectfully submitted,

MARTIN, PRINGLE, OLIVER,
WALLACE & BAUER, L.L.P.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 2nd day of October, 2019, the Prefiled Testimony of Mark McCann was electronically filed and served to the following by means of electronic service:

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