

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

In the matter of the General Investigation to)
Examine Issues Surrounding Rate Design) Docket No. 16-GIME-403-GIE
For Distributed Generation Customers)

**MOTION OF CROMWELL ENVIRONMENTAL, INC.
FOR ENLARGEMENT OF TIME TO RESPOND TO DISCOVERY**

COMES NOW Cromwell Environmental, Inc., by and through its counsel, and moves the Commission for an order enlarging the time in which it can respond to discovery requests. In support of this motion, Cromwell states as follows:

1. On May 18, 2017, Sunflower Electric Power Corporation (“Sunflower”) served its first request for data upon Cromwell seeking, *inter alia*, copies of all discovery answers provided by Cromwell to parties in this docket.

2. On May 19, 2017, Southern Pioneer Electric Company (“Pioneer”) served its first data requests upon Cromwell seeking, *inter alia*, copies of all discovery answers provided by Cromwell to parties in this docket.

3. Both counsel for Cromwell and principals of Cromwell are currently travelling and unable to discuss the response to the data requests Sunflower and Pioneer.

4. On May 23, 2017, Cromwell served answers, including objections, to data requests tendered by Westar Energy, Inc., and Kansas Gas and Electric Company May 5, 2017. These answers include information relevant to Westar, but not relevant to other parties and perhaps objectionable material as to Sunflower and Pioneer.

5. Furthermore, Westar has advised Cromwell of a potential dispute over discovery answers provided by Cromwell, which dispute cannot be timely resolved before meeting deadlines for response to the requests of Sunflower and Pioneer.

6. Counsel for Cromwell and Cromwell principals will not be able to discuss the response to Sunflower and Pioneer data requests until the week of May 29, 2017.

7. Cromwell and its counsel will require additional time to prepare its response.

WHEREFORE, Cromwell Environmental, Inc., requests an order enlarging the time it has to respond, *including objections*, to the discovery requests of Sunflower Electric Power Corporation and Southern Pioneer Electric Cooperative until June 9, 2017.

Respectfully submitted:

/s/ C. Edward Peterson

C. Edward Peterson, Ks. Bar No. 11129
5522 Aberdeen
Fairway, KS 66205
Tel. 816.365.8724
Fax. 913-722-0181
Email: ed.peterson2010@gmail.com

Attorney for Cromwell Environmental

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing motion was served electronically to all parties on the Commission's service list for this docket this 23rd day of May, 2017.

C. Edward Peterson