

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

SEP 8 2015

Office of Litigation Counsel

In the Matter of the Complaint Against Atmos Energy )  
by DH Pace Company Located At: 1901 E. 119th ) Docket No. 16-ATMG-049-COM  
Street, Olathe, Kansas 66061 )

**MOTION FOR EXTENSION OF TIME**

DH Pace moves the State Corporation Commission of the State of Kansas ("Commission") for an extension of time to file its response to Atmos' answer to the formal complaint filed in the above captioned matter. In support of the Motion, Managed Energy Systems states:

1. An Answer to the Complaint was filed with the Commission by Atmos Energy on September 25, 2015.

The Answer was mailed to Managed Energy Systems on August 25, 2015 and received on August 28<sup>th</sup>, 2015

2. Atmos Energy requests additional time to review the Answer to the Complaint and prepare a response to said Answer. Atmos Energy's counsel has contacted the Staff Attorney assigned to this docket and he indicated he has no objection to an extension in which to file its answer.

THEREFORE, DH Pace requests the Commission grant it until September 11th, 2015, in which to respond to the answer the Complaint.

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Leah N. Mullen  
Managed Energy Systems, LLC  
6600 College Blvd. Suite 125  
Overland Park, KS 66211  
(913) 333-3713, telephone  
leah@energymes.com

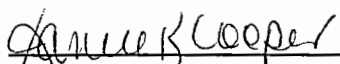
VERIFICATION

STATE OF KANSAS, COUNTY OF JOHNSON, ss:

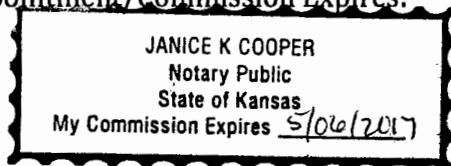
Leah N. Mullen, of lawful age, being first duly sworn on oath, states:

That she is representing Atmos Energy, named in the foregoing Motion for Extension of Time, and is duly authorized to make this affidavit; that she has read the foregoing Motion, and knows the contents thereof; and that the facts set forth therein are true and correct.

SUBSCRIBED AND SWORN to before me this 4th day of September, 2015.

  
\_\_\_\_\_  
Notary Public

Appointment/Commission Expires:



CERTIFICATE OF SERVICE

Whereby certify that a copy of the above and foregoing was mailed, postage prepaid, this 4<sup>th</sup> day of September, 2015, addressed to: James G. Flaherty, Anderson & Byrd, LLP, P.O. Box 17, Ottawa, KS 66067 and Michael J. Duenes, Litigation Counsel, Kansas Corporation Commission, 1500 SW Arrowhead Road, Topeka, Kansas 66604-4027.

  
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Leah N. Mullen