## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

)

)

)

In the Matter of the Complaint Against City of Garden City, Kansas, Respondent, for an Order Declaring that Garden City is Illegally Servicing Conestoga Energy Partners, LLC, in Wheatland Electric Cooperative, Inc.'s Certified Service Territory, and an Order to Cease, by Wheatland Electric Cooperative, Inc., Complainant.

Docket No. 17-GDCE-370-COM

## ENTRY OF APPEARANCE

Frank A. Caro and Andrew O. Schulte enter their appearance as counsel on behalf of the City of Garden City, Kansas ("Garden City"). In addition to the undersigned, any correspondence and service of all pleadings, testimony, briefs, and orders for the abovecaptioned case should be directed to the following individuals:

> Mike Muirhead, Public Utilities Director City of Garden City 301 N. 8<sup>th</sup> Street Garden City, Kansas 67846 Phone: (602) 271-1577 mike.muirhead@gardencityks.us

Randall D. Grisell, City Attorney (KS Bar #10547) Doering, Grisell & Cunningham, P.A. 124 Grant Avenue Garden City, Kansas Phone: (620) 275-8099 randyg@gcnet.com

Respectfully Submitte

Frank A. Caro, Jr. (KS Bar #11678) Andrew O. Schulte (KS Bar #24412) Polsinelli PC 900 W. 48<sup>th</sup> Place, Suite 900 Kansas City, MO 64112 Phone: (816) 572-4754 fcaro@polsinelli.com aschulte@polsinelli.com

## **VERIFICATION**

STATE OF MISSOURI COUNTY OF JACKSON

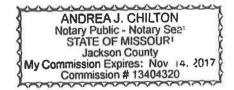
Frank A. Caro, Jr., being first duly sworn upon his oath, deposes and states that he is Counsel for the City of Garden City, Kansas, that he has read and is familiar with the foregoing, and that the statements therein are true to the best of his knowledge, information and belief.  $\Lambda$ 

Frank A. Caro, Jr.

Subscribed and sworn to before me this 24<sup>th</sup> day of March , 2017.

) ) SS.

)



## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above was  $\underline{\chi}$  mailed, postage prepaid,  $\underline{\chi}$  e-mailed this 28th day of March 2017, to:

Jean Payne, City Clerk City Of Garden City 301 N 8th St P.O. Box 998 Garden City, Ks 67846 Jean.Payne@GardenCityks.us

Michael Duenes, Assistant General Counsel Kansas Corporation Commission 1500 SW Arrowhead Rd Topeka, Ks 66604-4027 M.Duenes@KCC.KS.GOV

Jake Fisher, Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Rd Topeka, Ks 66604-4027 J.Fisher@KCC.KS.GOVv

Stephan Skepnek, Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Rd Topeka, Ks 66604-4027 S.Skepnek@KCC.KS.GOV

James M. McVay, Attorney Watkins Calcara Chtd. 1321 Main St. Ste 300 P. O. Drawer 1110 Great Bend, Ks 67530 Jmcvay@WCRF.com

Bruce W. Mueller, General Manager Wheatland Electric Cooperative, Inc. 101 Main Street P.O. Box 230 Scott City, Ks 67871 bmueller@weci.net Mike Muirhead City of Garden City 301 N. 8<sup>th</sup> Garden City, KS 67846 Mike.Muirhead@gardencityks.us

Randall D. Grisell Doering, Grisell & Cunningham, P.A. 124 Grant Avenue Garden City, Kansas randyg@gcnet.com

Forbil ( ,