# THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Joint Application of	)	
Sunflower Electric Power Corporation and	)	Docket No. 19-SEPE-054-MER
Mid-Kansas Electric Company, Inc. for an	)	
Order Approving the Merger of Mid-Kansas	)	
Electric Company, Inc. into Sunflower	)	
Electric Power Corporation.	)	

## **JOINT MOTION FOR EXTENSION OF TIME**

COMES NOW, Sunflower Electric Power Corporation ("Sunflower"), Mid-Kansas Electric Company, Inc. ("Mid-Kansas"), formerly known as Mid-Kansas Electric Company, LLC, (Sunflower and Mid-Kansas are collectively referred to as the "Joint Applicants"), the Staff of the State Corporation Commission of the State of Kansas ("Staff"), the Kansas Electric Power Cooperative, Inc. ("KEPCo"), the Kansas Municipal Energy Agency ("KMEA"), and the Kansas Power Pool, Inc. ("KPP") (the Joint Applicants, Staff, KEPCo, KMEA, and KPP are collectively referred to as the "Joint Movants"), and hereby move the Commission to extend the time for filing a settlement agreement. In support of their motion, the Joint Movants state the following:

- 1. On August 3, 2018, the Joint Applicants filed their Joint Application seeking an order approving the merger of Mid-Kansas into Sunflower.<sup>1</sup>
- 2. On Tuesday, February 19, 2019, the Joint Movants met to begin settlement discussions. Since that time, the Joint Movants have continued to engage in settlement discussions. Settlement talks continue to be productive between the parties.
- 3. While negotiations continue, the Joint Movants believe settlement in this matter is possible. Accordingly, the Joint Movants request additional time to finalize settlement discussions and reduce an agreement to writing.

<sup>&</sup>lt;sup>1</sup> Joint Application for Approval of Merger, Docket No. 19-SEPE-054-MER (filed August 3, 2018).

4. Specifically, the Joint Movants request the deadline for submitting a settlement agreement in this matter be extended until Friday, March 1, 2019, at 5:00 pm. To accommodate this filing, the Joint Movants request the deadline to submit testimony in support of or opposition to the settlement agreement be extended until Friday, March 8, 2019, at 5:00 p.m.

WHEREFORE, the Joint Movants respectfully request the Commission grant this motion approving the extension of time as set forth above, and for any other relief the Commission deems just and reasonable.

## Respectfully submitted,

## /s/ Mark D. Calcara

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#### **VERIFICATION**

STATE OF KANSAS	)
COUNTY OF ELLIS	)

I, Mark D. Calcara, verify under penalty of perjury that I have caused the foregoing Joint Motion to be prepared on behalf of Joint Applicants; that I have read and reviewed the Joint Motion; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

/s/ Mark D. Calcara
Mark D. Calcara, #9957

Executed on this 26th day of February, 2019.

#### CERTIFICATE OF SERVICE

I do hereby certify that on the 26th day of February, 2019, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing *Joint Motion* with an electronic copy e-mailed to:

/s/ Reneé K. Braun

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