BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

BEFORE COMMISSIONERS:	Pat Apple, Chair Jay Scott Emler, Commissioner Shari Feist Albrecht, Commissioner
) Docket No. 17-CONS-3673-CMSC
In the Matter of the Notice of Denial)
of License Renewal Application to) CONSERVATION DIVISION
Jones Gas Corporation.)
) License No. 32564

AGREED MOTION TO MODIFY PROCEDURAL SCHEDULE

COMES NOW Jones Gas Corporation ("Jones Gas"), by and through their counsel of record, Timothy E. McKee and Amy Fellows Cline of Triplett Woolf Garretson, LLC, and respectfully moves the Kansas Corporation Commission ("Commission") for an Order modifying the Procedural Schedule in this matter. In support of the Motion, Jones Gas states as follows:

- 1. On August 29, 2017, the Commission issued a Procedural Order in this matter.
- 2. Under the current Procedural Order, the Evidentiary Hearing is scheduled for October 19, 2017 and the deadline for any settlement agreement the parties wish to present for Commission consideration is scheduled for October 5, 2017.
- 3. On September 22, 2017, Jones Gas submitted information requests to Kansas Corporation Commission Staff. Jones Gas has also notified Staff that Jones Gas intends to seek permission to file a motion to dismiss and/or for summary judgment in this matter.
- 4. Given these developments, Jones Gas desires to move the Evidentiary Hearing in this matter to December 14, 2017 and to extend the deadline to present a

settlement agreement for Commission consideration to November 30, 2017. Jones Gas understands that Staff shares the same desires and does not object to this motion.

WHEREFORE, Jones Gas respectfully requests that the Commission issue an order amending the procedural schedule as proposed herein.

TRIPLETT WOOLF GARRETSON, LLC

Γimothy E. McKee, #07135

temckee@twgfirm.com

Amy Fellows Cline, #19995

amycline@twgfirm.com

2959 N. Rock Road, Suite 300

Wichita, Kansas 67226

Telephone: (316) 630-8100

Facsimile: (316) 630-8101

Attorneys for Jones Gas Corporation

VERIFICATION

STATE OF KANSAS)
) ss
COUNTY OF SEDGWICK)

Amy Fellows Cline, of lawful age, being first duly sworn upon my oath, state that I am one of the attorneys for Jones Gas Corporation; that I have read the above Petition; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.

Amy Fellows Cline, #19995

SUBSCRIBED AND SWORN to before me this 5th day of October, 2017.

Notary Public

My Appointment Expires:

KAY A. KISNER

NOTARY PUBLIC

STATE OF KANSAS

My Appt. Exp

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of October, 2017, the above **Agreed Motion** to **Modify Procedural Schedule** was electronically served on:

Joshua D. Wright
Jon Myers
Litigation Counsel
Kansas Corporation Commission
130 S. Market, Room 2078
Wichita, KS 67202
j.wright@kcc.ks.gov
j.myers@kcc.ks.gov

Michael J. Duenes Assistant General Counsel Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604-4027 m.duenes@kcc.ks.gov

Amy Fellows Cline, #19995