



**Judy Y. Jenkins**  
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November 21, 2017

**VIA ELECTRONIC TRANSMISSION**

Ms. Lynn Retz  
Secretary to Commission  
Kansas Corporation Commission  
1500 S.W. Arrowhead Road  
Topeka, KS 66604

Re: In the Matter of the General Investigation into the Operations of Kansas Gas Service, Inc., A Division of ONE Gas Regarding the Natural Gas Incident that Occurred at 918 W. 5<sup>th</sup> Street, Newton, Kansas.

Docket Number 17-KGSG-069-GIP

Dear Ms. Retz:

Enclosed please find the *Motion of Kansas Gas Service for an Expansion of Time to Respond to Staff's Report and Recommendation* for filing in the above-referenced matter.

Sincerely,

A handwritten signature in blue ink that reads 'Judy Y. Jenkins'.

Judy Y. Jenkins

JJ/sef  
Encl.

cc: Attorneys of Record

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

In the Matter of the General Investigation into )  
the Operations of Kansas Gas Service, Inc., A )  
Division of ONE Gas Regarding the Natural ) Docket No. 17-KGSG-069-GIP  
Gas Incident that Occurred at 918 W. 5<sup>th</sup> Street, )  
Newton, Kansas. )

**MOTION OF KANSAS GAS SERVICE FOR AN EXPANSION OF TIME TO RESPOND  
TO STAFF’S REPORT AND RECOMMENDATION**

Kansas Gas Service, Inc., a Division of ONE Gas, Inc., (“KGS” or “Company”) respectfully requests the Commission grant to the Company an expansion of time to prepare and file a response to Staff’s Report and Recommendation filed into this docket on November 9, 2017.

In support of this request, KGS states as follows:

1. On June 2, 2016, KGS experienced a reportable incident wherein a contractor’s employee was injured while performing work on natural gas facilities owned and operated by KGS.
2. On or about July 27, 2016, Staff was notified of the injury accident and initiated conversations with KGS regarding this matter.
3. On August 25, 2016, Staff filed a Motion to open a docket to investigate the reportable injury incident.
4. On September 1, 2016, the Commission granted Staff’s Motion to Open Docket. A procedural schedule has not been established in this matter.

5. Upon approval of Staff's Motion, Staff begun a rigorous and time intensive investigation which has included at a minimum: the issuance of numerous data requests, face-to-face conversations with both KGS and NPL Construction Co. ("NPL") personnel, interviewing of individuals involved and the issuance of Notices of Probable Non-Compliances and Notices of Amendments.

6. On November 9, 2017, Staff filed its Report and Recommendation in this matter. During a face-to-face meeting on November 15, 2017, Staff agreed to permit KGS additional time to work through Staff's Report and Recommendation and to prepare an equally thorough response. Staff and KGS agreed that it was reasonable to extend the response deadline to January 19, 2018.

WHEREFORE, Kansas Gas Service respectfully requests the Commission grant the Company an extension until January 19, 2018, to prepare and file a response to Staff's Report and Recommendation in this matter.

Respectfully Submitted,




Judy Y. Jenkins, KS Supr. Ct. #23300  
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VERIFICATION

STATE OF KANSAS )  
 )  
COUNTY OF Johnson )

I, Judy Jenkins, of lawful age, being first duly sworn upon oath, states as follows:  
I am a Managing Attorney for Kansas Gas Service, a Division of ONE Gas, Inc. I have read the above *Motion for Expansion of Time* and all the statements therein are true to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Judy Jenkins  
*Affiant*

SUBSCRIBED AND SWORN to before me on 11/21/17.

  
\_\_\_\_\_  
Notary public

My Appointment Expires:

06/05/18



**CERTIFICATE OF SERVICE**

I, Judy Jenkins, hereby certify that a copy of the above and foregoing *Motion of Kansas Gas Service for an Expansion of Time to Respond to Staff's Report and Recommendation* was forwarded this 21<sup>st</sup> day of November, 2017, addressed to:

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Judy Jenkins