# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

MAY 2 8 2013

In the Matter of the Application of Mid-Kansas	)	by State Corporation Commission
Electric Company, LLC, for Approval to Make	)	of Kansas
Certain Changes to its Charges for Electric Services	)	Docket No. 13-MKEE-699-RTS
in the Geographic Service Territory Served by	)	
Southern Pioneer Electric Company.	)	

#### UNNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Pursuant to K.A.R. 82-1-217(b), Staff of the State Corporation Commission of the State of Kansas ("Staff"), respectfully moves the Commission for an enlargement of time to file a response to Mid-Kansas Electric Company, LLC's ("Applicant") Motion for Procedural Schedule. In support of its motion, Staff states as follows:

- 1. On May 17, 2013, Applicant filed an Application on behalf of its member Southern Pioneer Electric Company (Southern Pioneer) for approval of certain changes to its charges for electric service in the geographic service territory served by Southern Pioneer.
- 2. On May 17, 2013, Applicant also filed a Motion for Procedural Schedule based on the 180 day processing time agreed to by the Parties in Settlement Agreement approved in 12-MKEE-380-RTS.
- 3. Pursuant to the Commission's Order Approving Settlement Agreement with Modifications (380 Order), the Parties to the 12-MKEE-380-RTS remain Parties to the Applicant's abbreviated filing.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Order Approving Settlement Agreement With Modifications, Docket No. 12-MKEE-380-RTS,¶¶ 3 and 15 (June 25, 2012).

4. At this time, the Parties have not yet had an opportunity to conduct a cursory review of the filing and to determine whether the Applicant's proposed Procedural Schedule will be sufficient as filed. As such Staff requests approval to expand its time to respond to Applicant's Motion for Procedural Schedule until May 31, 2013, to permit time to assess the filing and to reach out to all of the Parties identified in paragraph 3 of the Commission's 380 Order in an effort to establish an agreed upon Procedural Schedule.

5. Further, Staff has consulted Applicant and CURB regarding the desire to create and submit a Joint Proposed Procedural Schedule for Commission consideration. Both the Applicant and CURB have expressed interest in entering a Joint filing and are unopposed to this motion.

WHEREFORE, for the reasons stated above, Staff respectfully requests that the Commission approve Staff's request to enlarge its time to respond to Applicant's Motion for Procedural Schedule until May 31, 2013.

Respectfully submitted,

Judy Jenkins, S.Ct. #23300

Litigation Counsel

Kansas Corporation Commission

1500 SW Arrowhead Road

Topeka, Kansas 66604

(785) 271-3119 (Telephone)

(785) 271-3167 (Facsimile)

Attorney for Commission Staff

### **VERIFICATION**

STATE OF KANSAS	)
	) ss
COUNTY OF SHAWNEE	)

Judy Jenkins, of lawful age, being duly sworn upon her oath deposes and states that she is Litigation Counsel for the State Corporation Commission of the State of Kansas; that she has read and is familiar with the foregoing filing of Unopposed Motion for Enlargement of Time and attests that the statements therein are true to the best of her knowledge, information and belief.

Judy Jenkins, S.Ct. #23300

Litigation Counsel

The State Corporation Commission

of the State of Kansas

SUBSCRIBED AND SWORN to before me this 28th day of May, 2013.

PAMELA J. GRIFFETH Notary Public - State of Kansas

My Appointment Expires: august 17, 2015

#### **CERTIFICATE OF SERVICE**

#### 13-MKEE-699-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Unopposed Motion For Enlargement of Time was placed in the United States mail, postage prepaid, or hand-delivered this 28th day of May, 2013, to the following:

GLENDA CAFER, ATTORNEY CAFER LAW OFFICE, L.L.C. 3321SW 6TH ST TOPEKA, KS 66606 Fax: 785-233-3040 glenda@caferlaw.com

NIKI CHRISTOPHER, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3116 n.christopher@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Fax: 785-271-3116
d.smith@curb.kansas.gov

DAVID SPRINGE, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3116 d.springe@curb.kansas.gov

DON GULLEY, VP REGULATORY & MARKET AFFAIRS MID-KANSAS ELECTRIC COMPANY, LLC 301W 13TH ST PO BOX 980 HAYS, KS 67601 Fax: 785-623-3395 dqulley@sunflower.net

TERRI PEMBERTON, ATTORNEY CAFER LAW OFFICE, L.L.C. 3321 SW 6TH ST TOPEKA, KS 66606 Fax: 785-233-3040 terri@caferlaw.com

C. STEVEN RARRICK, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 Fax: 785-271-3116 s.rarrick@curb.kansas.gov

SHONDA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Fax: 785-271-3116
sd.smith@curb.kansas.gov

ANDREW FRENCH, ADVISORY COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 Fax: 785-271-3314 a.french@kcc.ks.gov

RANDY MAGNISON, EXEC VP & ASST CEO SOUTHERN PIONEER ELECTRIC COMPANY 1850 W OKLAHOMA PO BOX 368 ULYSSES, KS 67880-0368 Fax: 620-356-4306 rmagnison@pioneerelectric.coop

## **CERTIFICATE OF SERVICE**

13-MKEE-699-RTS

MARK D. CALCARA, ATTORNEY WATKINS CALCARA CHTD. 1321MAIN ST STE 300 PO DRAWER 1110 GREAT BEND, KS 67530 Fax: 620-792-2775 mcalcara@wcrf.com

Pamela Griffeth

Administrative Specialist