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

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In the Matter of the Recommendation to Initiate
A Show Cause Proceeding as to why
Sundowner, Inc. should not be Required to
Obtain a Certificate of Public Convenience
and Necessity to Operate as a Potable Water
Utility, and an Emergency Order Enforcing
Cold Weather Rules for Meter Disconnections
within Sundowner, Inc.'s Water Distribution
System.

Docket No. 24-SUNW-590-SHO

## **NOTICE OF SERVICE OF DISCOVERY RESPONSES**

COMES NOW Sundowner, Inc. ("Sundowner"), and hereby notifies the State Corporation Commission of the State of Kansas that it has submitted responses to Discovery Request Nos. 12, 13, 14, 15, 16, 17, 18, 19, and 20 issued by the Kansas Corporation Commission on September 11, 2024.

Respectfully submitted,

C. Edward Watson, II - #23386 Molly E. Morgan, #29683 FOULSTON SIEFKIN LLP 1551 N. Waterfront Parkway, Suite 100 Wichita, KS 67206-4466 316.267.6371 (office) 316.267.6345 (fax) Attorneys for Sundowner, Inc.

## **VERIFICATION**

STATE OF KANSAS COUNTY OF SEDGWICK

) ss:

Molly E. Morgan, of lawful age, being first duly sworn, on oath deposes and states:

I am an attorney for Sundowner, Inc. in the above-referenced matter. I have read the above and foregoing document, know and understand the contents thereof, and verify that the statements and allegations contained therein are true and correct, according to my knowledge, information and belief.

Molly E Morgan

Subscribed and sworn to before me this 17th day of September, 2024.

Morgyn Rosery

My appointment expires:





## **CERTIFICATE OF SERVICE**

I, the undersigned, certify that a true copy of the attached Notice of Service of Discovery Responses has been served to the following by means of electronic service on September 17, 2024.

C. Edward Watson II, Attorney Foulston Siefkin LLP 1551 N. Waterfront Pkwy, Ste 100 Wichita, KS 67206-446 cewatson@foulston.com

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Molly E. Morgan #29683