

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

In the Matter of the Application of Southern)
Pioneer Electric Company for Approval of its) Docket No. 24-SPEE-540-TAR
Renewable Energy Program Rider Tariff.)
)

MOTION TO FILE SETTLEMENT AGREEMENT OUT OF TIME

Southern Pioneer Electric Company (“Southern Pioneer”), hereby moves the Commission for an Order permitting the filing of the Settlement Agreement in the captioned docket out of time.

In support thereof, Southern Pioneer states:

1. Southern Pioneer, Kansas Corporation Commission Staff (“Staff”) and Citizens Utility Ratepayer Board (“CURB”) reached a Settlement Agreement in the captioned docket, which was filed herein on June 25, 2024.

2. The procedural order in this case called for filing of any settlement agreement by June 24, 2024, with testimony regarding the settlement to be filed by June 26, 2024.

3. During settlement discussions, the parties agreed to delay filing of testimony regarding the settlement until July 8, 2024. The parties discussed delaying filing of the settlement agreement until June 26, 2024, but there was miscommunication about whether there was an agreement to delay filing the Settlement Agreement.

4. As a result, Southern Pioneer has submitted the Settlement Agreement for filing concurrent with this motion, one day after the deadline for filing of settlement agreements in the docket procedural order.

5. Southern Pioneer respectfully requests that the Commission permit the filing of the Settlement Agreement out of time on June 25, 2024, one day after the deadline in the procedural

order. Southern Pioneer further requests that the Commission issue an order extending the date for filing of testimony regarding the Settlement Agreement until July 8, 2024, pursuant to the unanimous agreement of all of the parties in this docket.

WHEREFORE, Southern Pioneer respectfully requests that the Commission:

- (a) Permit filing of the Settlement Agreement out of time on June 25, 2024, and
- (b) Issue an order extending the deadline for filing of testimony regarding the Settlement Agreement from June 26, 2024 to July 8, 2024.

Respectfully submitted,

/s/ Will B. Wohlford _____

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**ATTORNEYS FOR SOUTHERN PIONEER
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CERTIFICATE OF SERVICE

24-SPEE-540-TAR

I, the undersigned, certify that a true and correct copy of the above and foregoing Motion to File Settlement Agreement Out of Time was served via electronic service this 25th day of June, 2024, to the following:

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