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

In the Matter of the Complaint Against	)	
Evergy Metro, Inc. by Scott Worthey	)	Docket No. 21-EKME-081-COM
	)	

## MOTION FOR EXTENSION OF TIME TO RESPOND TO STAFF REPORT AND RECOMMENDATION

Evergy Metro, Inc. ("Evergy Kansas Metro or Evergy") submits the following Motion for Extension of Time to Respond to Staff Report and Recommendation. In support of its Motion, Evergy Kansas Metro states as follows:

- 1. On or about August 7, 2020, Mr. Worthey filed his Complaint in this matter. The Commission authorized service of the Complaint on September 17, 2020 and Evergy was served with the Complaint thereafter. Evergy filed its Motion to Dismiss on October 5, 2020.
- 2. On July 30, 2021, Staff filed its Report and Recommendation in the above-captioned docket. Staff concludes that Evergy was not grossly negligent in maintaining its equipment so the Complaint should be dismissed. However, Staff makes several recommendations regarding Evergy's inspection of 34.5 kV double circuit lines within the next six months.
- 3. Evergy is in the process of reviewing Staff's recommendations and determining whether it has any concerns with the recommendations and how it might be able to implement them. However, given the breadth of the recommendations, Evergy has been unable to complete its review and analysis by the current deadline for its response to Staff's Report and Recommendation, which is today, August 9, 2021.
- 4. Therefore, Evergy requests that the Commission allow it an additional three weeks to prepare and file its response, making the new deadline August 30, 2021. This will

allow Evergy time to fully develop its response, have conversations with Staff as necessary to understand the recommendations, and provide its response to the Commission. Evergy has discussed its request for an extension with Staff and Staff has no objection.

WHEREFORE, Evergy Kansas Metro respectfully requests that the Commission grant its Motion for Extension of Time and for such further relief as may be appropriate.

Respectfully submitted,

EVERGY METRO, INC.

Cathryn J. Dinges, #20843

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## VERIFICATION

STATE OF KANSAS	)	
	)	SS
COUNTY OF SHAWNEE	)	

Cathryn J. Dinges, being duly sworn upon her oath deposes and says that she is one of the attorneys for Evergy Kansas Metro Energy, Inc.; that she is familiar with the foregoing **Motion** for Extension of Time; and that the statements therein are true and correct to the best of her knowledge and belief.

Cathryn J. Dinges

SUBSCRIBED AND SWORN to before me this 4th day of August, 2021.

NOTARY PUBLIC - State of Kansas

LESLIE R. WINES

My Appt. Exp. 5/20/24

My Appointment Expires: May 30, 2022

## CERTIFICATE OF SERVICE

I hereby certify that on this 9<sup>th</sup> day of August, 2021, the foregoing **Motion for Extension** of Time was electronically filed with the Kansas Corporation Commission and electronically served on all parties on the service list.

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