

WHEREFORE, for the reasons stated above, Staff respectfully requests the Commission vacate the Penalty Order issued to SAVE THE BEE'S RESCUE COMPANY in this docket on July 29, 2021.

Respectfully submitted,

/s/ Ahsan Latif

Ahsan Latif, S. Ct. #24709
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604
(785) 271-3118 (Telephone)
(785) 271-3124 (Facsimile)
a.latif@kcc.ks.gov (E-mail)

For Commission Staff

CERTIFICATE OF SERVICE

22-TRAM-014-PEN

I, the undersigned, certify that a true and correct copy of the above and foregoing motion was placed in the United States mail, postage prepaid this 19th day of August, 2021, to the following:

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
a.latif@kcc.ks.gov

SAVE THE BEES RESCUE COMPANY
11515 W 55TH STREET
SHAWNEE, KS 66203

Abigail Emery

* Denotes those receiving the Confidential version