

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

In the Matter of the Complaint of Southern)
Pioneer Electric Company Against the Kansas)
Power Pool Regarding Bypass and) Docket No. 17-KPPE-092-COM
Duplication of Service for 34.5kV Delivery to)
the City of Kingman.)

JOINT MOTION TO STAY PROCEDURAL SCHEDULE

Southern Pioneer Electric Company (Southern Pioneer) the Kansas Power Pool (KPP), and Mid-Kansas Electric Company, LLC (Mid-Kansas) (collectively, Joint Movants) hereby move the State Corporation Commission of the State of Kansas (Commission) for an order staying the procedural schedule as set forth in the Commission's March 30, 2017 *Order Adopting Procedural Schedule* (Procedural Order). In support thereof, Joint Movants state the following:

1. On September 9, 2016, Southern Pioneer filed a Formal Complaint against KPP (Complaint). On December 15, 2017, the Commission subsequently accepted the Complaint and caused it to be served on KPP.
2. On December 22, 2016, KPP filed its Answer to the Complaint.
3. On March 10, 2017, Mid-Kansas petitioned for intervention, and the Commission granted the intervention on March 30, 2017.
4. Also on March 30, 2017, the Commission issued its Procedural Order setting forth various procedural deadlines, including the first round of prefiled testimony due on April 28, 2017.
5. On April 4, 2017, Joint Movants met for the purposes of discussing settlement. As a result of those discussions, Joint Movants are exploring various options that may result in resolution of the issues in this proceeding. Due to the complexity of the issues, additional time is

needed to fully explore the potential settlement options. As such, Joint Movants request a stay to the Procedural Order to allow them to focus efforts on settlement rather than the drafting of testimony. Joint Movants are hopeful that a stay of thirty (30) days will be sufficient, but recognize that a stay of up to sixty (60) days may be necessary.

6. The Chief Executive Officers (CEOs) of Southern Pioneer and KPP are in contact weekly in order to ensure the settlement discussions are moving forward. At the time the issues are either resolved, or it becomes apparent that full resolution between the parties is unachievable, either Movant may file a request to lift the stay, and the parties shall provide the Commission with new procedural deadlines, as necessary and appropriate.

7. Joint Movants have discussed the stay with Commission Staff who have indicated that they have no objection to the request.

WHEREFORE, Joint Movants requests the Commission issue an Order granting a stay of the Procedural Order until such time that Joint Movants file to lift the stay, for the reasons and under the terms as set forth above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above pleading was electronically served, hand-delivered or mailed, postage prepaid, this 17th day of April, 2017 to:

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