# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of	
Southern Pioneer Electric Company	)
for Approval to Make Certain Revenue	) Docket No. 24-SPEE-415-TAR
Neutral Changes to its Rate Design.	

# STAFF'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL DIRECT TESTIMONY

Technical Staff ("Staff") of the State Corporation Commission of the State of Kansas (the "Commission") respectfully moves the Commission for leave to file Supplemental Direct Testimony of Robert H. Glass, Ph.D no later than April 9, 2024. In support of this Motion, Staff states as follows:

- 1. On November 30, 2023, Southern Pioneer Electric Company ("Southern Pioneer") filed its Application under K.S.A. 66-117 seeking approval to make certain revenue neutral changes to its rates design.
- 2. On December 12, 2023, the Citizens' Utility Ratepayers Board ("CURB") was granted intervention.
- 3. On January 18, 2024, the Commission issued an order setting the procedural schedule, scheduling an evidentiary hearing to be held on June 4-5, 2024.
- 4. On March 12, 2024, National Beef Packaging, LLC ("National Beef") and Air Products and Chemicals, Inc. ("Air Products") were each granted intervention.
- 5. In accordance with the Commission's ordered procedural schedule, Lana J. Ellis, Ph.D.; Kristina A. Luke Fry; and Robert H. Glass, Ph.D. each filed Direct Testimony on behalf of Staff on April 2, 2024.
- 6. Staff makes this request because Staff is currently awaiting corrected Transmission Level Service data from Southern Pioneer—that Staff anticipates receiving today, April 2, 2024.

Once Staff receives the corrected data, Dr. Glass will reasonably need additional time to evaluate

the corrected data and then supplement his Direct Testimony.

7. Staff has consulted with Southern Pioneer, CURB, National Beef, and Air Products

in anticipation of filing this Motion and all parties have represented they have no objection to

Staff's request so long as each of the following adjustments to the procedural schedule are adopted:

Cross-Answering Testimony is due by 5:00 p.m. on April 12, 2024; and (a)

Southern Pioneer Rebuttal Testimony is due by 5:00 p.m. on May 3, 2024. (b)

In view of the foregoing, Staff respectfully moves the Commission for leave to file

Supplemental Direct Testimony of Robert H. Glass, Ph.D no later than April 9, 2024, and adopt

the procedural schedule adjustments as stated in Paragraph 7.

Respectfully submitted,

/s/ Kyler C. Wineinger

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## **CERTIFICATE OF SERVICE**

#### 24-SPEE-415-TAR

I, the undersigned, certify that a true and correct copy of the above and foregoing Staff's Motion for Leave was served via electronic service this 2nd day of April, 2024, to the following:

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