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

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In the Matter of the Application of The Victory Electric Cooperative Association, Inc., Seeking Commission Approval to Update Its Local Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No. 21-SEPE-049-TAR.

Docket No. 25-VICE-393-TAR ) )

### JOINT MOTION FOR PROCEDURAL SCHEDULE

COMES NOW, The Victory Electric Cooperative Association, Inc. ("Victory"), the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission," respectively), the Kansas Municipal Energy Agency ("KMEA"), and Kansas Electric Power Cooperative, Inc. ("KEPCo") (collectively referred to as "Joint Movants") hereby move the Commission for an Order establishing a procedural schedule in the above-captioned matter. In support of their motion, Joint Movants state the following:

- 1. On May 1, 2025 Victory filed its Application seeking approval to update its local access delivery service tariff pursuant to the 34.5kV formula-based rate plan ("34.5kV FBR").
  - 2. On May 2, 2025, KMEA filed an Entry of Appearance.
  - 3. On May 19, 2025, KEPCo filed an Entry of Appearance.

4. In informal discussions between parties, Victory, Staff, KMEA, and KEPCo indicated their willingness to collaborate on a schedule that adheres to the 34.5kV FBR protocols.

5. To the best of Joint Movants' abilities at this time, the proposed schedule takes into consideration the 34.5kV FBR protocols, as well as individual scheduling concerns of all parties and the Commission. The proposed procedural schedule agreed to by Joint Movants is as follows:

PROPOSED DATE	PROPOSED TIME	ACTION
Friday, May 2, 2025		"Day 1": day after the filing date but not prior to March 1
Thursday, July 3, 2025* *date is greater than 10 days before the technical conference date due to the 7/4 holiday	5:00 PM	Questions submitted to Victory (10 days before Technical Conference- Day 75)
Tuesday, July 15, 2025	2:00 PM	Technical Conference, if necessary (Day 75)
Wednesday. August 20, 2025	9:00 AM	Status Telephone Conference (Day 110-115)
Friday, August 29, 2025	5:00 PM	Staff and Interveners complete the review of the Annual Update, and either file a Report and Recommendations or testimony stating that the results of the riling will result in just and reasonable rates; or, if necessary, Staff and/or Interveners shall file testimony supporting the reason(s) why the filing would not result in just and reasonable rates. (Day 120)
Friday, September 12, 2025	5:00 PM	Victory files rebuttal Testimony, if necessary (Day 135)
Friday, September 19, 2025		Deadline for Issuing Discovery (Day 142)
Thursday, September 25, 2025		Commission issues an order either approving the rate adjustments based upon the paper record or notifying the parties an evidentiary hearing will be held. (Day 150)
Wednesday, October 22, 2025	9:00 AM, via Zoom	A one-day Evidentiary Hearing, if needed, based upon the Commission 150-day order. (Day 155-159)
Tuesday, October 28, 2025		Final Commission Order, if Evidentiary Hearing is held. (Day 180)

WHEREFORE, Joint Movants respectfully request the Commission issue an order granting

this Joint Motion, approving the procedural schedule as set forth above, and for any other relief

the Commission deems just and reasonable.

Respectfully submitted,

s/ Taylor P. Calcara Taylor P. Calcara (#25561) Jack L. Roenne (#30380) Watkins Calcara, Chtd. 1321 Main Street, Suite 300 P.O. Drawer 1110 Great Bend, Kansas 67530 (620) 792-8231 telephone (620) 792-2775 facsimile tcalcara@wcrf.com jroenne@wcrf.com

# COUNSEL FOR THE VICTORY ELECTRIC COOPERATIVE ASSOCIATION, INC.

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### **COUNSEL FOR COMMISSION STAFF**

<u>/s/ Susan B. Cunningham</u> Susan B. Cunningham (#14083) Senior Vice President, Regulatory and Government Affairs, and General Counsel Kansas Electric Power Cooperative, Inc. 600 SW Corporate View Topeka, KS 66615 O: (785) 271-4815 M: (785) 817-1864 scunningham@kepco.org

# COUNSEL FOR THE KANSAS ELECTRIC POWER COOPERATIVE, INC.

/s/ Terri J. Pemberton

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## COUNSEL FOR THE KANSAS MUNICIPAL ENERGY AGENCY

#### **VERIFICATION**

STATE OF KANSAS ) ) ss: COUNTY OF BARTON )

Taylor P. Calcara, of lawful age, being first duly sworn on oath states:

That he is counsel for The Victory Electric Cooperative Association, Inc.; that he has read the foregoing pleading and knows the contents thereof; and, that the facts therein are true and correct to the best of his knowledge, information and belief.

Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 20th day of June, 2025

NOTARY PUBLIC - State of Kansas ANGELA A. OBERLE My Appt. Exp. April 10, 2029

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Angela A. Oberle, Notary Public

My Commission expires: April 10, 2029.

#### **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this  $20^{44}$  day of June, 2025, the above and foregoing Joint Motion For Procedural Schedule was submitted to the following parties via electronic mail:

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<u>s/ Taylor P. Calcara</u> Taylor P. Calcara