

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

In the Matter of the Application of Western Cooperative)
Electric Association, Inc. Seeking Commission Approval to)
Update Its Local Access Delivery Service Tariff Pursuant to) Docket No. 17-WSTE-477-TAR
the 34.5kV Formula Based Rate Plan Approved in Docket)
No. 16-MKEE-023-TAR)

**JOINT MOTION FOR PROCEDURAL SCHEDULE, PROTECTIVE ORDER, AND
DISCOVERY ORDER**

Western Cooperative Electric Association, Inc. (“Western”) the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively), Kansas Electric Power Cooperative, Inc. (“KEPCo”), and the Kansas Power Pool (“KPP”) (collectively referred to as “Joint Movants”) hereby move the Commission for an Order establishing a procedural schedule, Protective Order, and Discovery Order in the above-captioned matter. In support of their motion, Joint Movants state the following:

1. On April 26, 2017, Western 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”) approved in Docket No. 16-MKEE-023-TAR.

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

3. 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 the Joint Movants and the Commission. The proposed procedural schedule agreed to by Joint Movants is as follows:

Action	Date and Time
Staff/intervener questions submitted to Western	June 9 th
Technical Conference, if necessary	June 23rd at 9:00 am at Western's Offices. Western will accommodate those who cannot attend in person.
Status telephone conference	August 18th at 3:30pm; call in information to be distributed later
Staff and Interveners complete the review of the Annual Update, and either file a Report and Recommendation or testimony stating that the results of the filing 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.	August 24th
Western files rebuttal testimony, if necessary	September 8 th
Commission issues an order either approving the rate adjustments based upon the paper record or notifying the parties that an evidentiary hearing will be held.	September 25 th Note: Day 150 is Saturday, September 23 rd
A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 150 day Order.	October 2 nd at 9:00 am
Final Order issued if the matter goes to evidentiary hearing.	October 23 rd

4. In addition, the Joint Movants respectfully request the Commission issue a Protective Order and Discovery Order in this docket to allow the parties to begin discovery.

WHEREFORE, Joint Movants respectfully request the Commission issue an order granting this Joint Motion, approving the procedural schedule set forth above, and issuing a Protective Order and Discovery Order.

Respectfully submitted,



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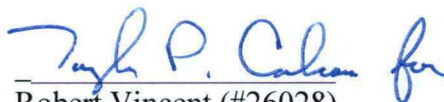
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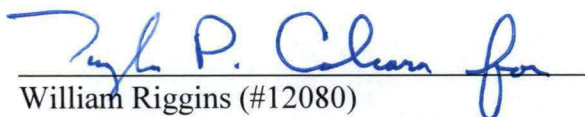
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VERIFICATION

STATE OF KANSAS)
)
COUNTY OF ELLIS) ss:

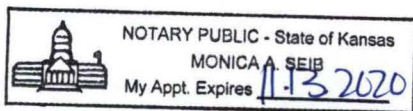
Taylor P. Calcara, of lawful age, being first duly sworn on oath states:

That he is counsel for Western Cooperative Electric 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 15 day of May, 2017.





Notary Public

My Commission expires: 11.13.2020

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Joint Motion for Procedural Schedule was forwarded via e-mail to the following parties on this 15th day of May, 2017:

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