THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Sunflower Electric)
Power Corporation and Kansas Electric Power)
Cooperative, Inc. for an Order Approving a New) Docket No. 19-SEPE-185-CON
Wholesale Power Agreement)

JOINT MOTION

Sunflower Electric Power Corporation ("Sunflower"), Kansas Electric Power Cooperative, Inc. ("KEPCo") and the Staff of the Kansas Corporation Commission of the State of Kansas ("Staff")(collectively, Sunflower, KEPCo, and Staff are hereinafter referred to as the "Joint Movants") hereby file this Joint Motion respectfully requesting the Kansas Corporation Commission of the State of Kansas ("Commission") to transfer all pleadings and documents of record in this proceeding to Docket No. 06-SEPE-1203-CON. In support of its Joint Motion, Joint Movants state as follows:

- 1. On May 12, 2006, Sunflower and KEPCo filed a joint application in Docket No. 06-SEPE-1203-CON (the "06-1203 Docket") for Commission approval of a Wholesale Power Agreement ("WPA"), dated May 11, 2006, between Sunflower and KEPCo. The WPA provided that Sunflower would sell and KEPCo would purchase power and energy from Sunflower at Sunflower's Member Rate ("WHM Rate") under tariff schedule WHM-04 plus an adder (collectively, the "WPA Rate"). The Commission approved the WPA and WPA Rate on July 17, 2006 in the 06-1203 Docket.
- 2. Since December 16, 2011, Sunflower's Board of Directors has annually modified its WHM Rate resulting in Sunflower filing an application in the 06-1203 Docket each year, in accordance with the April 19, 2010 Order Approving Stipulation and Agreement in the 06-1203 Docket, to reflect the revised WPA Rate and request its approval.

- 3. On November 2, 2018, Sunflower filed an application requesting approval of WHM-19 as the contract rate for the WPA. That filing was docketed as a new docket and assigned Docket No. 19-SEPE-185-CON.
- 4. For ease of administration, and to remain consistent with the historical filings regarding the WPA and its updated rate schedule each year, Joint Movants respectfully request that all pleadings and documents of record in Docket No. 19-SEPE-185-CON be transferred to the 06-1203 Docket, and Docket No. 19-SEPE-185-CON be subsequently closed.
- As part of the transfer between dockets, Joint Movants recognize the previously issued Orders in the 19-SEPE-185-CON Docket shall remain intact and enforceable in the 06-1203 Docket.
- 6. Furthermore, Docket No. 06-SEPE-1203-CON is currently closed and will need to be reopened to allow for pleadings and orders to be subsequently filed. Joint Movants agree that Docket 06-1203 should remain open until a final order is issued by the Commission.

WHEREFORE, for the reasons set forth above, Joint Movants respectfully request this Joint Motion be granted, and for any other relief the Commission deems just and reasonable.

Respectfully submitted,

Taylor P. Calcara, #25561 Watkins Calcara, Chtd.

1321 Main Street, Suite 300

P.O. Drawer 1110

Great Bend, KS 67530

COUNSEL FOR SUNFLOWER ELECTRIC POWER CORPORATION

/s/ Cole Bailey

Cole Bailey, #27586
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604
c.bailey@kcc.ks.gov

COUNSEL FOR THE STAFF OF THE KANSAS CORPORATION COMMISSION

Susan B. Cunningham, #14083

SVP, Regulatory and Government Affairs,

and General Counsel

Kansas Electric Power Cooperative, Inc.

600 SW Corporate View

P.O. Box 4877

Topeka, KS 66604-0877

scunningham@kepco.org

COUNSEL FOR KANSAS ELECTRIC POWER COOPERATIVE, INC.

VERIFICATION

STATE OF KANSAS)
COUNTY OF BARTON) ss:

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

That he is an attorney for Sunflower Electric Power Corporation; that he has read the above and foregoing Joint Motion and knows the contents thereof; and that the statements contained therein are true.

Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 21st day of November, 2018.

NOTARY PUBLIC - State of Kansas
MELISSA A. HUBBARD
My Appt. Exp. September 11, 2022

Notary Public

My Commission expires: 9-11-2022

CERTIFICATE OF SERVICE

I do hereby certify that on the 21st day of November, 2018, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing Joint Motion with an electronic copy e-mailed to:

/s/ Reneé K. Braun

19-185 SERVICE LIST

COLE BAILEY, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 c.bailey@kcc.ks.gov

ROBERT VINCENT, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 r.vincent@kcc.ks.gov

SUSAN B. CUNNINGHAM, SVP, Regulatory and Government Affairs, General Counsel KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877
scunningham@kepco.org

06-1203 SERVICE LIST

OTTO NEWTON, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD ROAD TOPEKA, KS 66604
O.NEWTON@KCC.KS.GOV

SUSAN B. CUNNINGHAM, SVP, Regulatory and Government Affairs, General Counsel KANSAS ELECTRIC POWER CO-OP, INC. 600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877
scunningham@kepco.org

MARK DOLJAC, DIR RATES AND REGULATION KANSAS ELECTRIC POWER CO-OP, INC. 600 SW CORPORATE VIEW (66615) PO BOX 4877 TOPEKA, KS 66604-0877 MDOLJAC@KEPCO.ORG

RENEE BRAUN, CORPORATE PARALEGAL & CONTRACTS SUPERVISOR SUNFLOWER ELECTRIC POWER CORPORATION 301 W. 13TH PO BOX 1020 (67601-1020) HAYS, KS 67601 RBRAUN@SUNFLOWER.NET

JAMES BRUNGARDT, MANAGER, REGULATORY RELATIONS SUNFLOWER ELECTRIC POWER CORPORATION 301 W. 13TH PO BOX 1020 (67601-1020) HAYS, KS 67601 JBRUNGARDT@SUNFLOWER.NET

STUART LOWRY, PRESIDENT AND CEO SUNFLOWER ELECTRIC POWER CORPORATION 301 W. 13TH PO BOX 1020 (67601-1020) HAYS, KS 67601 slowry@sunflower.net

MARK D. CALCARA, ATTORNEY WATKINS CALCARA CHTD. 1321 MAIN ST STE 300 PO DRAWER 1110 GREAT BEND, KS 67530 MCALCARA@WCRF.COM