

**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 Duplication) Docket No. 17-KPPE-092-COM
of Service for 34.5kV Delivery to the City of)
Kingman.)

MOTION TO MODIFY PROCEDURAL SCHEDULE

The Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission”, respectively) move the Commission for an order modifying the Prehearing Officer Order Lifting Stay and Amending Procedural Schedule issued on July 10, 2017. In support of the Motion, Staff states as follows:

1. On September 9, 2016, Southern Pioneer Electric Company (“Southern Pioneer”) filed a Formal Complaint against Kansas Power Pool (“KPP”).
2. On December 15, 2016, the Commission accepted the Complaint and caused it to be served on KPP.
3. On December 22, 2016, KPP filed its Answer to the Complaint.
4. On March 10, 2017, Mid-Kansas Electric Company, LLC (Mid-Kansas), petitioned for intervention, and the Commission granted the intervention on March 30, 2017.
5. On March 30, 2017, the Commission issued its first Procedural Order.
6. On April 4, 2017, Southern Pioneer and KPP met for the purposes of informally discussing settlement. As a result of those discussions, Southern Pioneer and KPP desired to explore various options that could result in resolution of the issues in this proceeding. However, due to the complexity of the issues, additional time was needed to fully explore the potential settlement options.

7. As such, on April 17, 2017, Joint Movants filed a Joint Motion to Stay Procedural Schedule to allow the parties to focus efforts on settlement rather than the drafting of testimony.

8. On May 2, 2017, the Commission issued an Order Granting Stay, granting the Joint Motion to Stay Procedural Schedule, staying the proceeding for sixty (60) days, and requiring that Joint Movants provide the Commission a proposed amended procedural schedule at the completion of sixty (60) days.

9. On June 2, 2017, the Joint Movants submitted to the Commission a status report, stating that despite settlement discussions, Southern Pioneer and KPP have been unable to reach a full resolution of the issues at this time, and further stating that the Joint Movants intend to file a motion to lift the stay and/or provide the Commission with a proposed amended procedural schedule within the next thirty (30) days.

10. Accordingly, on June 20, 2017, the Joint Movants filed their Joint Motion to Lift Stay and Modify Procedural Schedule.

11. On July 10, 2017, the Prehearing Officer issued a Prehearing Officer Order Lifting Stay and Amending Procedural Schedule which lifted the stay and approved of the following proposed amended procedural schedule:

DATE	TIME	DESCRIPTION
(Friday) July 7, 2017	5:00 pm	Southern Pioneer Direct Testimony
(Monday) August 7, 2017	5:00 pm	KPP Direct Testimony
(Wednesday) September 6, 2017	5:00 pm	Southern Pioneer's Rebuttal Testimony
(Tuesday) September 12, 2017	9:00 am	Settlement Conference (as needed) KCC Office, 1500 SW Arrowhead Rd., 3 rd Floor Hearing Room, Topeka, KS
(Thursday) September 21, 2017	5:00 pm	S&A and Support Testimony
(Wednesday) November 8, 2017	5:00 pm	Staff Report and Recommendation
(Monday) November 20, 2017	5:00 pm	List of Contested Issues ¹

¹ The list of Contested Issues shall include an appendix that cites to the name of the witness and page number of the pre-filed testimony addressing each issue listed.

(Monday) November 20, 2017	10:00 am	Prehearing Conference, KCC Office, 1500 SW Arrowhead Rd., 3rd Floor Hearing Room, Topeka, KS
(Tuesday – Wednesday) November 28, 2017 November 29, 2017	10:30 am TBD	Evidentiary Hearing, KCC Office, 1500 SW Arrowhead Rd., 1st Floor Hearing Room, Topeka, KS
(Monday) December 18, 2017	5:00 pm	Simultaneous Briefing by the Parties
(Thursday) January 18, 2018		Order due date

12. On September 12, 2017, the Settlement Conference was held at the KCC Office and the parties agreed to modify the procedural schedule to allow KPP, Southern Pioneer, and Mid-Kansas additional time to file briefs on jurisdiction issues.

13. Accordingly, Staff hereby requests approval of the proposed amended procedural schedule as follows:

DATE	TIME	DESCRIPTION
(Tuesday) October 3, 2017	5:00 pm	KPP Brief Due
(Tuesday) October 24, 2017	5:00 pm	Southern Pioneer & Mid-Kansas Briefs Due
(Friday) November 3, 2017	5:00 pm	Staff Brief Due
(Friday) December 8, 2017	5:00 pm	Commission Order on Briefs Due
(Wednesday) January 24, 2018	5:00 pm	Staff Report and Recommendation
(Wednesday) January 31, 2018	5:00 pm	List of Contested Issues ²
(Wednesday) January 31, 2018	10:00 am	Prehearing Conference, KCC Office, 1500 SW Arrowhead Rd., 3rd Floor Hearing Room, Topeka, KS
(Tuesday – Wednesday) February 6, 2018 February 7, 2018	10:30 am 9:00 am	Evidentiary Hearing, KCC Office, 1500 SW Arrowhead Rd., 1st Floor Hearing Room, Topeka, KS
(Wednesday) March 7, 2018	5:00 pm	Simultaneous Briefing by the Parties
(Thursday) April 5, 2018		Order due date

This proposed amended procedural schedule has also been reviewed and agreed to by Southern Pioneer, KPP and Mid-Kansas.

WHEREFORE, Staff respectfully requests the Commission issue an order amending the procedural schedule as proposed herein.

² The list of Contested Issues shall include an appendix that cites to the name of the witness and page number of the pre-filed testimony addressing each issue listed.

Respectfully submitted,

/s/ Stephan Skepnek

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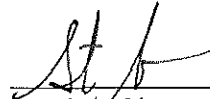
Attorney for Commission Staff

VERIFICATION

18-KGSG-120-GIP

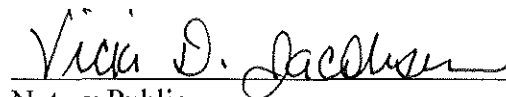
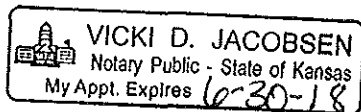
STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

Stephan Skepnek, of lawful age, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing *Motion to Modify Procedural Schedule*, and attests that the statements therein are true and correct to the best of his knowledge, information and belief.



Stephan Skepnek, S. Ct. # 27337
Litigation Counsel
The State Corporation Commission
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 26th day of September, 2017.


Notary Public

My Appointment Expires: June 30, 2018

CERTIFICATE OF SERVICE

17-KPPE-092-COM

I, the undersigned, certify that a true and correct copy of the above and foregoing Motion to Modify Procedural Schedule was served via electronic service this 26th day of September, 2017, to the following:

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CERTIFICATE OF SERVICE

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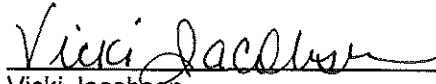
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