

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

In the Matter of the Annual Filing of)
Southern Pioneer Electric Company for)
Approval to Make Certain Changes to Its) Docket No. 16-SPEE-_____-RTS
Charges for Electric Services, Pursuant to the)
34.5kV Formula Based Rate Plan Approved)
in Docket No. 16-MKEE-023-TAR.)
)

**MOTION OF SOUTHERN PIONEER ELECTRIC COMPANY
TO FILE APPLICATION FOR ANNUAL UPDATE,
EXHIBITS AND TESTIMONY OUT OF TIME**

COMES NOW Southern Pioneer Electric Company, (“Southern Pioneer”), and files its Motion to File Application for Annual Update, Exhibits and Testimony Out of Time (“Motion”) in the above captioned matter. In support of its Motion, Southern Pioneer states as follows:

1. Pursuant to the processes and protocols (“Protocols”) approved by the Commission in Docket No. 16-MKEE-023-TAR, on or before May 2, 2016, Southern Pioneer was to file its Application for Annual Update seeking Commission approval to update its LAC to wholesale LADS customers and retail rates charged to Southern Pioneer retail consumers taking electric service over Southern Pioneer’s 34.5kV sub-transmission facilities.

2. Southern Pioneer had prepared its Application for Annual Update for filing May 2, 2016 via the Commission’s electronic filing system; however, on May 3, 2016, Southern Pioneer discovered that due to an internal miscommunication, Southern Pioneer’s Application for Annual Update inadvertently did not get filed.

3. On May 3, 2016, Southern Pioneer filed its Application for Annual Update with the Commission in this docket.

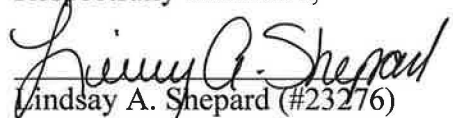
4. Even though the Application for Annual Update was mistakenly not filed with the Commission on May 2, 2016, all parties to this proceeding, including Commission Staff, received electronic service of the Application for Annual Update on May 2, 2016, as required by the Protocols.

5. Section B of the Protocols provides that within 90 days from the filing date, the Commission is to issue an order either approving the Application for Annual Update based upon the paper record, or order an evidentiary hearing to be held to address the issues raised by the Application for Annual Update. Southern Pioneer respectfully requests that the Commission issue its order 90 days from May 2, 2016, instead of the actual filing date, May 3, 2016.

6. Commission Staff has indicated to Southern Pioneer through informal discussion that Staff does not object to the Motion. No party to this matter will be prejudiced if the Commission accepts Southern Pioneer's Application for Annual Update, Exhibits and Testimony Out of Time.

WHEREFORE, for the reasons stated above, Southern Pioneer hereby requests the Commission grant this Motion to File out of Time and issue an order in this proceeding within 90 days from May 2, 2016.

Respectfully submitted,



Lindsay A. Shepard (#23276)

Executive Vice President – General Counsel
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**ATTORNEY FOR SOUTHERN
PIONEER ELECTRIC COMPANY**

VERIFICATION


STATE OF KANSAS)
)
COUNTY OF GRANT) ss:

Lindsay A. Shepard, of lawful age, being first duly sworn on oath states:

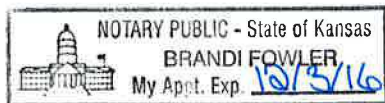
That she is counsel for Southern Pioneer Electric Company; that she has read the foregoing motion and knows the contents thereof; and that the facts therein are true and correct to the best of her knowledge, information, and belief.


Lindsay A. Shepard

SUBSCRIBED AND SWORN to before me this 3rd day of May, 2016.


Notary Public

My Commission expires: 12/3/16



CERTIFICATE OF SERVICE

I do hereby certify that on the 3rd day of May, 2016, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing pleading with electronic copies emailed to:


Lindsay A. Shepard

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