

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

JOINT MOTION TO LIFT STAY AND MODIFY PROCEDURAL SCHEDULE

Southern Pioneer Electric Company (Southern Pioneer), the Kansas Power Pool (KPP) and Mid-Kansas Electric Company, LLC (Mid-Kansas), (collectively, Joint Movants) respectfully move the Commission for an order lifting the stay of the procedural schedule instituted in the Commission's Order Granting Stay issued on May 2, 2017, and modifying the Order Adopting Procedural Schedule issued on March 30, 2017. In support of its Joint Motion, Joint Movants state as follows:

1. On September 9, 2016, Southern Pioneer filed a Formal Complaint against KPP (Complaint). On December 15, 2016, the Commission subsequently accepted the Complaint and caused it to be served on KPP.
2. On December 22, 2016, KPP filed its Answer to the Complaint.
3. On March 10, 2017, Mid-Kansas petitioned for intervention, and the Commission granted the intervention on March 30, 2017.
4. On March 30, 2017, the Commission issued its Procedural Order setting forth the following deadlines:

DATE	TIME	DESCRIPTION
(Friday) April 28, 2017	5:00 pm	Southern Pioneer Direct Testimony
(Monday) June 12, 2017	5:00 pm	KPP Direct Testimony
(Wednesday) July 12, 2017	5:00 pm	Southern Pioneer's Rebuttal Testimony
(Monday-Wednesday) July 17-19	9:00 am	Settlement Conference (as needed) KCC Office, 1500 SW Arrowhead Rd., 3rd

		Floor Hearing Room, Topeka, KS
(Monday) July 24, 2017	5:00 pm	S&A and Support Testimony
(Wednesday) September 13, 2017	5:00 pm	Staff's Report and Recommendation
(Wednesday) September 20, 2017	5:00 pm	Listing of Contested Issues
(Friday) September 22, 2017	10:00 am	Prehearing Conference, KCC Office, 1500 SW Arrowhead Rd., 3 rd Floor Hearing Room, Topeka, KS
(Tuesday-Wednesday) September 26, 2017 September 27, 2017	10:30 am 9:00 am	Evidentiary Hearing, KCC Office, 1500 SW Arrowhead Rd., 1 st Floor Hearing Room, Topeka, KS
(Tuesday) October 31, 2017	5:00 pm	Simultaneous Briefing by the Parties
(Thursday) November 30, 2017		Order due date

5. 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.

6. 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.

7. 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 to the Commission a proposed amended procedural schedule at the completion of the sixty (60) days.

8. 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.

9. Accordingly, the Joint Movants hereby request a lift of the stay of the procedural schedule and approval of the proposed amended procedural schedule as follows:

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 Rebuttal Testimony
Tuesday September 12, 2017	9:00 am	Settlement Conference KCC Office, 1500 SW Arrowhead Rd., 3rd 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	Listing of Contested Issues
(Monday) November 20, 2017	10:00 am	Prehearing Conference, KCC Office, 1500 SW Arrowhead Rd., 3 rd Floor Hearing Room, Topeka, KS
(Tuesday-Wednesday) November 28, 2017 November 29, 2017		Evidentiary Hearing, KCC Office, 1500 SW Arrowhead Rd., 1 st Floor Hearing Room, Topeka, KS
(Monday) December 18, 2017	5:00 pm	Simultaneous Briefing by the Parties
(Thursday) January 18, 2018		Order due date

This proposed amended procedural schedule has also been reviewed and agreed to by Commission Staff.

WHEREFORE, Joint Movants respectfully request the Commission issue an order lifting the stay of the procedural schedule and amending the procedural schedule as proposed herein.

Respectfully submitted,

/s/ Lindsay A. Shepard

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**COUNSEL FOR MID-KANSAS ELECTRIC
COMPANY, LLC**

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above pleading was electronically served this 20th day of June, 2017 to:

/s/ Lindsay A. Shepard
Lindsay Shepard

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