

**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. 19-WSTE-443-TAR
the 34.5kV Formula Based Rate Plan Approved in Docket)
No. 16-MKEE-023-TAR)

**JOINT MOTION FOR PROCEDURAL SCHEDULE AND LIMITED WAIVER OF
PROTOCOLS**

COMES NOW, the 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 and granting a limited waiver in the above-captioned matter.

In support of their motion, Joint Movants state the following:

1. On April 26, 2019, 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. On May 2, 2019, KPP filed a Petition to Intervene.
3. On May 14, 2019, KEPCo filed an Entry of Appearance.
4. 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.
5. To the best of Joint Movants’ abilities at this time, the proposed schedule takes into consideration the 34.5kV FBR protocols (with a limited exception as explained below), as well as individual scheduling concerns of all parties and the Commission. The proposed procedural schedule agreed to by Joint Movants is as follows:

Action	Date and Time
Technical Conference, if necessary	July 10 th at 3:00pm at Western's Offices. Western will accommodate those who cannot attend in person.
Status telephone conference	August 14 th at 10:00 am; 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 26 th
Western files rebuttal testimony, if necessary	September 9 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 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 9 th at 9:00 am
Final Order issued if the matter goes to evidentiary hearing.	October 23 rd

6. Joint Movants recognize that the one day evidentiary hearing in the aforementioned procedural schedule falls outside of the range of dates required by the 34.5kV FBR protocols. The parties have agreed to a date differing from the 34.5kV FBR protocols for the evidentiary hearing in order to accommodate a conflict with the Commission's calendar during the time period required for any necessary evidentiary hearing under the 34.5kV FBR protocols and, therefore, request a limited waiver of the 34.5kV FBR protocols in this instance only.

WHEREFORE, Joint Movants respectfully request the Commission issue an order granting this Joint Motion, approving the procedural schedule as set forth above, granting the limited waiver as described herein, and for any other relief the Commission deems just and reasonable.

Respectfully submitted,



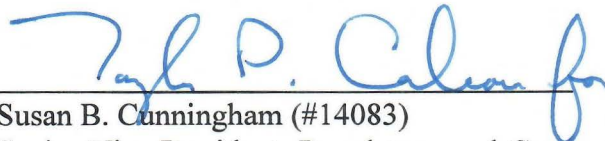
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A handwritten signature in blue ink, reading "Amy P. Cline for".

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COUNSEL FOR THE KANSAS POWER POOL

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF BARTON) ss:

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

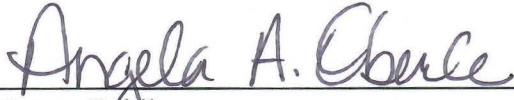
That he is counsel for Western Cooperative Electric Association, Inc.; that he has read the foregoing pleading and knows the contents thereof; and, that the facts therein are true and correct to the best of his knowledge, information and belief.



Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 16th day of May, 2019.





Notary Public

My Commission expires: April 10, 2021

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 16th day of May, 2019:

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