## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

)

)

)

)

In the Matter of the Application of Southern Pioneer Electric Company for Approval to Make Certain Revenue Neutral Changes to its Rate Design.

Docket No. 24-SPEE-415-TAR

### JOINT MOTION FOR PROCEDURAL ORDER

Southern Pioneer Electric Company ("Southern Pioneer"), the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission", respectively), and the Citizens' Utility Ratepayers Board ("CURB"), (collectively referred to as "Joint Movants") hereby move the Commission for an Order establishing a procedural schedule in the abovecaptioned matter. In support of this motion, Joint Movants state the following:

On November 30, 2023, Southern Pioneer filed its Application pursuant to K.S.A.
66-117 seeking approval to make certain revenue neutral changes to its rates design.

2. On December 5, 2023, CURB filed a petition to intervene to which Southern Pioneer has no objection.

3. Joint Movants conferred to develop a procedural schedule for this docket to propose to the Commission for consideration. That proposed schedule, as agreed to by Joint Movants, is as follows:

November 30, 2023	Application filed
April 3, 2024	Staff/Intervenors file Direct Testimony
April 10, 2024	Staff/Intervenors file Cross-Answering Testimony

April 30, 2024	Southern Pioneer files Rebuttal Testimony
May 9, 2024	Settlement negotiations
	Discovery cut-off
May 15, 2024	Settlement filed
	Public comment period ends
May 17, 2024	Prehearing Conference
May 21, 2024	Testimony on Settlement due
May 29, 2024	Submit hearing exhibits
June 4-5, 2024	Evidentiary Hearing
June 14, 2024	Southern Pioneer files Initial Brief
June 26, 2024	Staff/Intervenors file Briefs
July 2, 2024	Southern Pioneer files Reply Brief
July 30, 2024	Order

4. The above schedule was developed to parallel Southern Pioneer's 2024 Formula Based Rate ("FBR") filing<sup>1</sup> so that the rate changes from that docket can be implemented at the same time as any changes approved in this docket.

WHEREFORE, Joint Movants respectfully request the Commission grant this motion and issue an order approving the procedural schedule as set forth above.

<sup>&</sup>lt;sup>1</sup> Southern Pioneer's 2024 FBR application will be filed on May 1, 2024. Under the schedule approved in the FBR Protocols, an order would issue by July 30, 2024, assuming an evidentiary hearing is not held.

Respectfully submitted,

<u>|s|Glenda Cafer</u>

Glenda Cafer (#13342) Trevor C. Wohlford (#19443) Morris Laing Law Firm 800 SW Jackson, Ste. 1310 Topeka, Kansas 66612 Phone: (785) 430-2003 gcafer@morrislaing.com twohlford@morrislaing.com

## ATTORNEYS FOR SOUTHERN PIONEER ELECTRIC COMPANY

[s] Carly R. Masenthin

Carly R. Masenthin (#27944) Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, Kansas 66604 (785) 271-3361 c.masenthin@kcc.ks.gov

# ATTORNEY FOR COMMISSION STAFF

Is David W. Mickel

David W. Nickel, Consumer Counsel (#11170) Todd E. Love, Attorney (#13445) Joseph R. Astrab, Attorney (#26414) Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 (785) 271-3200 d.nickel@curb.kansas.gov t.love@curb.kansas.gov j.astrab@curb.kansas.gov

# COUNSEL FOR THE CITIZENS' UTILITY RATEPAYERS BOARD

STATE OF KANSAS ) ) ss: COUNTY OF SHAWNEE )

## **VERIFICATION**

I, Glenda Cafer, verify under penalty of perjury that I have caused the foregoing pleading to be prepared; that I have read and reviewed the same; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

|s|Glenda Cafer

### CERTIFICATE OF SERVICE SOUTHERN PIONEER 24-SPEE-415-RTS

I, the undersigned, do hereby certify that a true copy of the attached Joint Motion for Procedural Schedule has been served to the following by means of electronic service on this 5<sup>th</sup> day of December, 2023:

JOSEPH R. ASTRAB, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 j.astrab@curb.kansas.gov

TODD E. LOVE, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 <u>t.love@curb.kansas.gov</u>

DAVID W. NICKEL, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 D.NICKEL@CURB.KANSAS.GOV

SHONDA RABB CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 <u>s.rabb@curb.kansas.gov</u>

DELLA SMITH CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 <u>d.smith@curb.kansas.gov</u>

CARLY MASENTHIN, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 c.masenthin@kcc.ks.gov

KYLER C. WINEINGER, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 <u>k.wineinger@kcc.ks.gov</u> DAVID COHEN, ASST GENERAL COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604 d.cohen@kcc.ks.gov

TREVOR WOHLFORD, ATTORNEY MORRIS LAING EVANS BROCK & KENNEDY 800 SW JACKSON SUITE 1310 TOPEKA, KS 66612-1216 twohlford@morrislaing.com

BRIAN BEECHER, OPER/ENG. MGR SOUTHERN PIONEER ELECTRIC COMPANY 3997 NE WELL ROAD PO BOX 347 MEDICINE LODGE, KS 67104 BBEECHER@SOUTHERNPIONEER.NET

LINDSAY CAMPBELL, INTERIM PRES. & CEO SOUTHERN PIONEER ELECTRIC COMPANY 1850 W OKLAHOMA PO BOX 430 ULYSSES, KS 67880-0368 <a href="mailto:lcampbell@pioneerelectric.coop">lcampbell@pioneerelectric.coop</a>

LARISSA LAYMAN, LEGAL EXEC ASST SOUTHERN PIONEER ELECTRIC COMPANY 1850 W OKLAHOMA PO BOX 430 ULYSSES, KS 67880-0368 <u>LLAYMAN@PIONEERELECTRIC.COOP</u>

RICHARD J MACKE, VP - ECONOMICS, RATES, AND BUSINESS PLANNING DPT. SOUTHERN PIONEER ELECTRIC COMPANY 10710 Town Square Dr NE Ste 201 Minneappolis, MN 55449 rmacke@powersystem.org CLINT MEIER, VP – ENG. & OPERATIONS SOUTHERN PIONEER ELECTRIC COMPANY 1850 WEST OKLAHOMA PO BOX 403 ULYSSES, KS 67880 cmeier@pioneerelectric.coop CHANTRY SCOTT, INTERIM ASST CEO & CFO SOUTHERN PIONEER ELECTRIC COMPANY 1850 WEST OKLAHOMA PO BOX 403 ULYSSES, KS 67880 <u>CSCOTT@PIONEERELECTRIC.COOP</u>

<u>|s|Glenda Cafer</u>