

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

In the Matter of the Application of Prairie Land Electric)
Cooperative, Inc., Seeking Commission Approval to) Docket No. 17-PLCE-478-TAR
Update Its Local Access Delivery Service Tariff Pursuant)
to the 34.5 kV Formula Based Rate Plan Approved in)
Docket No. 16-MKEE-023-TAR)

JOINT MOTION FOR PROCEDURAL SCHEDULE

Prairie Land Electric Cooperative, Inc., (“Prairie Land”) the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission”, respectively), Kansas Electric Power Cooperative, Inc., (“KEPCo”), the Kansas Power Pool (“KPP”), (collectively referred to as “Joint Movants”) hereby move the Commission for an Order establishing a Procedural schedule, Protective Order, and Discovery Order in the above captioned matter. In support of their motion, Joint Movants state the following:

1. On April 25, 2017, Prairie Land 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. In informal discussions between parties, Prairie Land, Staff, KEPCo and KPP indicated their willingness to collaborate on a schedule that adheres to the 34.5kV FBR protocols.
3. To the best of Joint Movants’ abilities at this time, the proposed schedule takes into consideration the 34.5kV FBR protocols, 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
Staff/intervener questions submitted to Prairie Land	June 22 nd
Technical Conference, if necessary	July 7 th at 9:00 a.m. at Prairie Land's offices. Prairie Land will accommodate those who cannot attend in person.
Status telephone conference	August 18 th at 10:00 a.m.; call in information to be distributed later.
Staff and Interveners complete the review of the Annual Update, and either file a Report and Recommendations 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 23 rd
Prairie Land files rebuttal testimony, if necessary	September 7 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 22 nd
A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 150 day Order.	September 29 th at 9:00 a.m.
Final Order issued if the matter goes to evidentiary hearing.	October 23 rd

WHEREFORE, Joint Movants respectfully request the Commission issue an order granting this Joint Motion, approving the Procedural schedule set forth above, and issuing a Protective Order and Discovery Order.

Respectfully submitted,

/s/ John F. McClymont
John F. McClymont, #09379
McClymont Law Office, PA
120 S. State - PO Box 364
Norton, Kansas 67654
785.877.5183
Email: jfmc@att.net
COUNSEL FOR PRAIRIE LAND ELECTRIC
COOPERATIVE, INC

/s/ Robert Vincent
Robert Vincent # 26028
Litigation Counsel
Kansas Corporation Commission
1500 Sw Arrowhead Road
Topeka, KS 66604
r.vincent@kcc.ks.gov
COUNSEL FOR COMMISSION STAFF

/s/ William Riggins
William Riggins #12080
Kansas Electric Power Cooperative, Inc.
600SW Corporate View
Topeka, KS 66615
briggins@kepc.org
COUNSEL FOR KANSAS ELECTRIC POWER
COOPERATIVE, INC.

/s/ Timothy E. McKee
/s/ Amy Fellows
Timothy E. McKee #7135
Amy Fellows #19995
Triplett Woolf Garretson, LLC

2959 North Rock Road, Suite 300
Wichita, KS 67226
316.60.8100
316.630.8101
temekee@twgfirm.com
amycline@twgfirm.com
COUNSEL FOR KANSAS POWER POOL

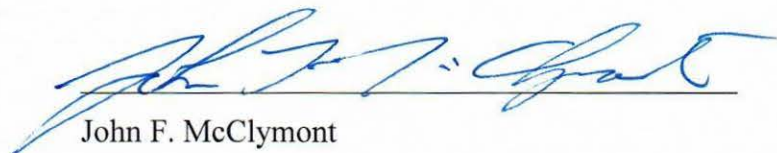
APPROVED BY:

/s/ W. Robert Alderson
W. Robert Alderson #6629
Alderson, Alderson, Weiler, Conklin
Burghart & Crow, LLC
2101 South 21st Street
Topeka, KS 66604
785.232.0753
boba@aldersonlaw.com
COUNSEL FOR KMEA

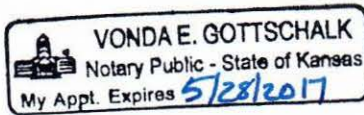
STATE OF KANSAS)
) ss:
COUNTY OF NORTON)

John F. McClymont, of lawful age, being first duly sworn on oath states:

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


John F. McClymont

SUBSCRIBED AND SWORN before me this 19 day of May, 2017.



A handwritten signature in blue ink, appearing to read "Vonda E. Gottschalk", written over a horizontal line.

Notary Public

My appointment expires: 5/28/2017

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 email to the following parties on the 19 day of May, 2017.

ROBERT VINCENT, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
r.vincent@kcc.ks.gov

Justin Grady
KCC STAFF
j.grady@kcc.ks.gov

Tim Rehagen
KCC STAFF
t.rehagen@kcc.ks.gov

AMY FELLOWS CLINE, ATTORNEY
TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
amycline@twgfirm.com

TIMOTHY E. MCKEE, ATTORNEY

TRIPLETT, WOOLF & GARRETSON, LLC
2959 N ROCK RD STE 300
WICHITA, KS 67226
TEMCKEE@TWGFIRM.COM

KIRK A. GIRARD, DIRECTOR OF FINANCE
PRAIRIE LAND ELECTRIC COOPERATIVE, INC.
14935 US HWY 36
PO BOX 360
NORTON, KS 67654-0360
kgirard@ple.coop

CHARLES LOOK, ASSISTANT TO THE CEO
PRAIRIE LAND ELECTRIC COOPERATIVE, INC.
14935 US HWY 36
PO BOX 360
NORTON, KS 67654-0360
clook@prairielandelectric.com

ALLAN MILLER, CEO
PRAIRIE LAND ELECTRIC COOPERATIVE, INC.
14935 US HWY 36
PO BOX 360
NORTON, KS 67654-0360
AMILLER@PLE.COOP

W. Robert Alderson #6629
Alderson, Alderson, Weiler, Conklin
Burghart & Crow, LLC
2101 South 21st Street
Topeka, KS 66604
785.232.0753
boba@aldersonlaw.com
COUNSEL FOR KMEA

Heather H. Starnes
Counsel to KMEA
Healy Law Offices LLC
12 Perdido Circle
Little Rock, AR 72211
501.516.0041
heather@healylawoffices.com

Terry M. Jarrett
Counsel to KMEA

Healy Law Offices, LLC
514 East High Street, Suite 22
Jefferson City, MO 65101
573.415.8379
terry@healylawoffices.com

Paul Mahlberg
General Manager KMEA
6300 West 95th Street
Overland Park, KS 66212
913.660.0234
mahlberg@kmea.com

/s/ John F. McClymont
John F. McClymont #09379
COUNSEL FOR PRAIRIE LAND ELECTRIC
COOPERATIVE, INC.