

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of)
Southern Pioneer Electric Company for) Docket No. 20-SPEE- 169 -RTS
Approval to Make Certain Changes in its)
Charges for Electric Service.)

JOINT PETITION FOR WAIVER OF FILING REQUIREMENTS

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 Ratepayer Board (CURB) (collectively referred to as Joint Movants) hereby move the Commission for an Order waiving certain filing requirements contained in K.A.R. 82-1-231, with respect to Southern Pioneer's Application seeking recovery of revenue for services provided to its customers. In support of its motion, Joint Movants state the following:

1. The minimum filing requirements (MFRs) contained in K.A.R. 82-1-231 are extensive and are generally used for traditional investor-owned utility rate applications. However, Southern Pioneer is a not-for-profit electric utility that is a wholly owned subsidiary of a self-regulated cooperative electric utility, Pioneer Electric. Because Southern Pioneer is not-for profit, and not organized as a cooperative, the MFRs contained in 82-1-231 and 82-1-231a are either too extensive or do not apply to Southern Pioneer.

2. Historically, the Commission has recognized the unique nature of Southern Pioneer and has granted waiver of its MFRs on rate applications involving Southern Pioneer's service

territory.¹ Consistent with past practice, Southern Pioneer discussed with Staff and CURB a potential waiver of the K.A.R. 82-1-231 MFRs. As a result of those discussions, Joint Movants agreed to seek Commission waiver of the MFRs and have attached hereto as **Attachment A**, the items identified as necessary for a thorough investigation of Southern Pioneer's Application. Because Southern Pioneer will be using a predetermined revenue requirement, Joint Movants request Southern Pioneer not be required to file:

- A. A schedule detailing plant investments by functional classification, unadjusted amounts, proposed adjustments to these amounts, and jurisdictional amounts.
- B. A schedule detailing the components included in working capital, proposed adjustments and jurisdictional allocations.
- C. A schedule indicating the amounts of major components of the capital structure of the company, including long-term debt and patronage capital outstanding at the beginning and the end of the test year.
- D. Statement of Operations – Present Rates with Pro Forma Adjustments and Supporting Schedules

WHEREFORE, Joint Movants respectfully request the Commission grant this motion waiving the filing requirements of K.A.R. 82-1-231 and approving the use of the modified filing requirements attached hereto.

Respectfully submitted,

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¹ See, Docket Nos. 08-MKEE-816-MIS 12-MKEE-380-RTS, 14-SPEE-507-RTS, 15-SPEE-161-RTS. See also, Docket Nos. 13-MKEE-452-MIS and 16-MKEE-023-TAR where the Commission approved protocols that included minimum filing requirements for Southern Pioneer's formula-based rate plans.

/s/ Glenda Cafer

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ATTORNEYS FOR CURB

Attachment A
Southern Pioneer Minimum Filing Requirements

1. Prefiled Direct Testimony in Support of Exhibits and Workpapers
2. Schedule of Revenue Requirements
3. Class Cost of Service analysis
4. Statement of Operations – Proposed Rates with Pro Forma Adjustments and Supporting Schedules for Rate Classes
5. Comparison of Present and Proposed Rate Schedules
6. Comparison of Monthly Bills
7. Present Rate Schedules
8. Present Rate Schedules with Redlined Proposed Changes
9. Proposed Rate Schedules
10. Workpapers
11. Audited Financial Statements