

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

JAN 15 2008

In the Matter of the Application of)
Kansas Electric Power Cooperative, Inc.)
for Approval to Make Changes in Its)
Charges for Electric Service.)

Docket No. 08-KEPE-597-RTS

 Docket
Room

JOINT MOTION FOR PREHEARING CONFERENCE

COME NOW, the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively), the Citizens' Utility Ratepayer Board (CURB), and the Kansas Electric Power Cooperative, Inc. (KEPCo), and files their Joint Motion for Prehearing Conference. In support of their filing, joint movants state as follows:

1. On December 21, 2007, KEPCo filed an application with the Commission seeking approval to increase the rates it charges for electric service by \$5,410,938 to correct a revenue deficiency. As part of its application, KEPCo discussed the need for swift treatment of its application to address harm the company may face if the revenue deficiency is not corrected. Accordingly, KEPCo provided three mutually exclusive options it believed would address the revenue deficiency: 1) interim rate relief; 2) a temporary surcharge; and 3) expedited treatment of the rate application.

2. Prior to filing the application, Staff met with KEPCo to discuss the application and the apparent need for some type of expeditious treatment. At that meeting, Staff suggested KEPCo raise the three options discussed above in the application to provide sufficient procedural alternatives because Staff could not commit to accepting one proposal over another without first reviewing the substantive filing.


3. Staff understands the concerns giving rise to the three procedural alternatives, but has not had sufficient time to conduct a thorough review of the application or the three options

provided by KEPCo. In order to provide Staff sufficient time to thoroughly review and analyze the three options and decide which option to procedurally support, Staff and KEPCo request the Commission set this matter for prehearing conference on Tuesday, February 12, 2008 at 2:00 p.m. for the purpose of discussing the three options and establishing a procedural schedule. By that time, Staff will have had the opportunity to review the application and the procedural alternatives and make a recommendation as to which way to proceed.

WHEREFORE, Staff, CURB, and KEPCo request the Commission establish a prehearing conference in this matter on Tuesday, February 12, 2008 at 2:00 p.m.

Respectfully submitted,

Kansas Corporation Commission Staff



W. Thomas Stratton, Jr., #11916
Chief Litigation Counsel
Jason T. Gray, # 22619
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604
(785) 271-3119 telephone
(785) 271-3167 facsimile

Kansas Electric Power Cooperative, Inc.

J. Michael Peters, #7457
Vice President, Administration and General Counsel
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, Kansas 66615
(785) 273-7010 telephone

Frank A. Caro, Jr., #11678
Anne E. Callenbach, #18488
Polsinelli Shalton Flanigan Suelthaus, P.C.

6201 College Boulevard, Suite 500
Overland Park, KS 66211
(913) 451-8788 telephone

provided by KEPCo. In order to provide Staff sufficient time to thoroughly review and analyze the three options and decide which option to procedurally support, Staff and KEPCo request the Commission set this matter for prehearing conference on Tuesday, February 12, 2008 at 2:00 p.m. for the purpose of discussing the three options and establishing a procedural schedule. By that time, Staff will have had the opportunity to review the application and the procedural alternatives and make a recommendation as to which way to proceed.

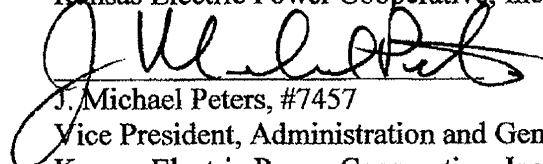
WHEREFORE, Staff, CURB, and KEPCo request the Commission establish a prehearing conference in this matter on Tuesday, February 12, 2008 at 2:00 p.m.

Respectfully submitted,

Kansas Corporation Commission Staff

W. Thomas Stratton, Jr., #11916
Chief Litigation Counsel
Jason T. Gray, # 22619
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604
(785) 271-3119 telephone
(785) 271-3167 facsimile

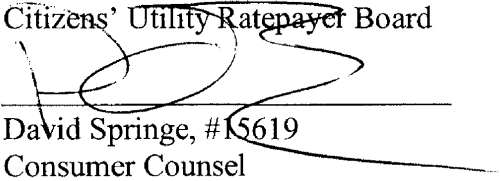
Kansas Electric Power Cooperative, Inc.



J. Michael Peters, #7457
Vice President, Administration and General Counsel
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, Kansas 66615
(785) 273-7010 telephone

Frank A. Caro, Jr., #11678
Anne E. Callenbach, #18488
Polsinelli Shalton Flanigan Suelthaus, P.C.

Citizens' Utility Ratepayer Board



David Springe, #15619

Consumer Counsel

Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

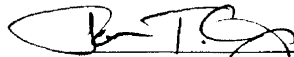
Topeka, Kansas 66604

(785) 271-3239 telephone

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

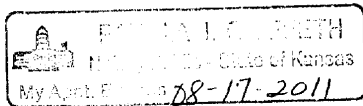
VERIFICATION

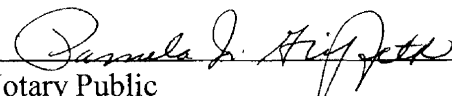
Jason T. Gray, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas, that he has read and is familiar with the foregoing *Joint Motion* and that the statements contained therein are true and correct to the best of his knowledge, information and belief.



Jason T. Gray, #22619
Kansas Corporation Commission of the
State of Kansas

Subscribed and sworn to before me this 15th day of January 2008.





Notary Public

My Appointment Expires: August 17, 2011

CERTIFICATE OF SERVICE

08-KEPE-597-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Joint Motion For Prehearing Conference was placed in the United States mail, postage prepaid, or hand-delivered this 15th day of January, 2008, to the following:

NIKI CHRISTOPHER, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
Fax: 785-271-3116
n.christopher@curb.kansas.gov
**** Hand Deliver ****

C. STEVEN RARRICK, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
Fax: 785-271-3116
s.rarrick@curb.kansas.gov
**** Hand Deliver ****

DAVID SPRINGE, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
Fax: 785-271-3116
d.springe@curb.kansas.gov
**** Hand Deliver ****

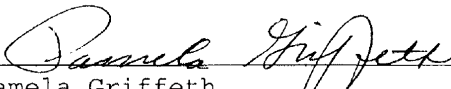
ROBERT D BOWSER, VICE PRES REGULATORY &
TECHNICAL SERVICES
KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877
Fax: 785-271-4888

STEPHEN PARR, EXEC VP & CEO
KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877
Fax: 785-271-4888
sparr@kepco.org

J MICHAEL PETERS, GENERAL COUNSEL
KANSAS ELECTRIC POWER CO-OP, INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877
Fax: 785-271-4888
mpeters@kepco.org

ANNE E. CALLENBACH, ATTORNEY
POL SINELLI SHALTON FLANIGAN & SUELTHAUS
6201 COLLEGE BLVD
SUITE 500
OVERLAND PARK, KS 66211
Fax: 913-451-6205
acallenbach@polsinelli.com

FRANK A. CARO, JR., ATTORNEY
POL SINELLI SHALTON FLANIGAN & SUELTHAUS
6201 COLLEGE BLVD
SUITE 500
OVERLAND PARK, KS 66211
Fax: 913-451-6205
fcaro@polsinelli.com



Pamela Griffeth
Administrative Specialist