

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

In the Matter of the Joint Application of)
Sunflower Electric Power Corporation,)
and Wheatland Electric Cooperative, Inc., for Approval)
of a Local Access Charge and a 34.5kV Formula-) Docket No. 25-SEPE-309-TAR
Based Rate.)
)
)

REVISED TESTIMONY OF

**BRUCE W. MUELLER
GENERAL MANAGER**

**ON BEHALF OF JOINT APPLICANTS WHEATLAND ELECTRIC COOPERATIVE,
INC. AND SUNFLOWER ELECTRIC POWER CORPORATION**

June 2, 2025

1 **Q. Please state your name, business address and position.**

2 My name is Bruce W. Mueller. My business address for legal service is 101 Main Street, Scott
3 City, Kansas 67871 and for mail receipt is P.O. Box 230, Scott City, Kansas 67871.

4 **Q. What is your profession?**

5 A. I am the General Manager (GM) of Wheatland Electric Cooperative, Inc.(Wheatland), a
6 member-owned Kansas electric cooperative serving more than 23,400 consumers located
7 throughout nine western Kansas, six central Kansas, and two eastern Colorado counties. Our
8 corporate office is located in Scott City, Kansas.

9 **Q. What is the purpose of your revised testimony?**

10 A. I submitted pre-filed testimony on February 5, 2025, supporting the Joint Application of
11 Wheatland and Sunflower Electric Power Corporation in this docket. During the course of
12 discovery and answering data requests from the Staff of the Corporation Commission of the state
13 of Kansas (Commission), it has come to light that Wheatland had errors in the original local access
14 charge filings and the protocols for the requested formula-based rate. After correcting those
15 errors, Wheatland's rate consultant, Josh Dan, has now calculated the appropriate local access
16 charge to be \$3.09 per kW demand instead of \$2.95. My purpose is to make formal request to
17 the Commission for the \$3.09 per kW demand.

18 **Q. Are you sponsoring any exhibits?**

19 A. Yes, I am sponsoring two exhibits to revise the per kW demand charge in Wheatland's
20 Local Access Delivery Service tariff. Specifically, those exhibits are BWM – 2_revised that is the
21 red-lined tariff currently on file with the Commission and BWM – 3_revised that is the clean version
22 of the requested tariff.

1 **Q. Does the 14 cent change in the amount of the per kW demand within the requested**
2 **tariff in any other way change your prior pre-filed testimony of February 5, 2025.**

3 A. It does not. I still believe firmly in the positions taken in that testimony. I still believe that
4 this rate will help Wheatland meet its financial obligations, and that the rate is reasonable and not
5 unduly preferential or prejudicial. Moreover, Wheatland's reasoning for the formula-based rate
6 has not changed, and I believe is appropriate.

7 **Q. Does this conclude your revised testimony?**

8 A. Yes.

Direct Testimony of Bruce W. Mueller
25-SEPE-309-TAR

VERIFICATION OF BRUCE W. MUELLER

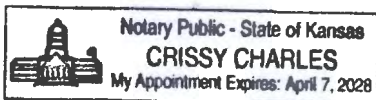
STATE OF KANSAS)
) ss:
COUNTY OF Barton)

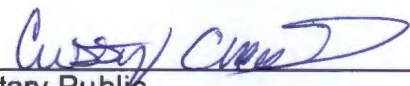
Bruce W. Mueller, being first duly sworn, deposes and says that he is the Joshua Dan referred to in the foregoing document entitled "Revised Testimony of Bruce W. Mueller" before the State Corporation Commission of the State of Kansas and that the statements therein were prepared by him or under his direction and are true and correct to the best of his information, knowledge, and belief.



Bruce W. Mueller

SUBSCRIBED AND SWORN to before me this 30 day of May, 2025.





Notary Public

My Appointment Expires: April 7, 2028

CERTIFICATE OF SERVICE

I do hereby certify that on the 2nd day of June, 2025, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the *Revised Testimony of Bruce W. Mueller* with an electronic copy e-mailed to:

/s/ Amanda Wray

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THE STATE CORPORATION COMMISSION OF KANSAS

Index No. 24

WHEATLAND ELECTRIC COOPERATIVE, INC.
(Name of Utility)

Schedule: ~~1625~~ – LAC

WHEATLAND EAST
(Territory to which schedule is applicable)

Replacing Schedule ~~1316~~ – LAC
Which was filed: ~~November 21, 2013~~ December 15, 2016

No Supplement or separate understanding
shall modify the tariff as shown hereon.

Sheet 1 of 2 Sheets

LOCAL ACCESS DELIVERY SERVICE

AVAILABLE

Entire Service Area of Wheatland East.

APPLICABLE

For delivery to wholesale (sales for resale) customers over Wheatland’s East (34.5 kV or other available lower primary voltage) sub-transmission/distribution system.

CHARACTER OF SERVICE

Alternating current, 60 cycle, three phase, 34.5 kV or other available lower primary voltage.

MONTHLY RATE

Demand Charge @ \$ ~~1.993.09~~ per kW.

MONTHLY BILLING DEMAND

When service is provided in association with network service, the Monthly Billing Demand shall be defined as the Customer’s kilowatt contribution to the Local Access Delivery System maximum hourly demand coincident with Wheatland East’s monthly Local Access Delivery System peak in the billing month measured at the low side of the delivery point (“the Actual CP Demand”). Generation that is located behind the meter of a designated network load shall be metered and the amount of generation serving the Customer’s network load at the time of Wheatland East’s monthly Local Access Delivery System peak shall be added to the Customer’s Actual CP Demand to determine the Monthly Billing Demand. For other local access service (including, but not limited to, Point to Point transmission service requiring local access service and service reservations) Monthly Billing Demand shall be the greater of the customer’s service request or actual maximum monthly demand.

LOSSES

Real Power Losses are associated with all Local Access Delivery service. The Local Access Delivery customer is responsible for replacing losses associated with all transmission service as calculated by MKEC or paying MKEC for the Real Power Losses at MKEC’s wholesale rate pursuant to Attachments H and M of MKEC’s Open Access Transmission Tariff. The applicable Real Power Loss factor for applicable service area is as follows:

Issued _____
Month Day Year

Effective _____
Month Day Year

By _____
Bruce W. Mueller General Manager

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Sheet 2 of 2 Sheets

LOSS FACTORS

1.35 percent of energy as measured at the delivery point.

DELAYED PAYMENT

As per schedule DPC.

TERMS AND CONDITIONS

Service will be rendered under Mid-Kansas Electric Company, Inc.'s Open Access Transmission Tariff (for service over Wheatland's East sub-transmission system) as filed with the Kansas Corporation Commission, and the Cooperative's Rules and Regulations.

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Month Day Year

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WHEATLAND ELECTRIC COOPERATIVE, INC.

Schedule: 25 – LAC

(Name of Utility)

Replacing Schedule 16 – LAC

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MONTHLY RATE

Demand Charge @ \$ 3.09 per kW.

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