

**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.)

JOINT MOTION TO CANCEL REMAINING PROCEDURAL MILESTONES

Sunflower Electric Power Corporation (“Sunflower”), Wheatland Electric Cooperative, Inc. (“Wheatland”) (Sunflower and Wheatland collectively referred to as the “Joint Applicants”), and the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission” respectively) (Joint Applicants and Staff collectively referred to as the “Joint Movants”) hereby move the Commission for an Order canceling the remaining milestones on the Procedural Schedule and request that the Commission issue an order based on the existing record in the above-captioned matter. In support of their motion, Joint Movants state the following:

1. On February 5, 2025, the Joint Applicants filed their Joint Application seeking approval of changes to the currently approved Local Access Delivery Service (“LADS”) tariff that would increase the Local Access Charge (“LAC”), approval of a 34.5kV formula-based rate (“FBR”) associated with Wheatland’s 34.5kV sub-transmission system, and annual protocols (“Protocols”). Joint Applicants also filed Testimony and supporting exhibits of Bruce W. Mueller, Traci R. Goddard, and Joshua Dan.

2. On February 10, 2025, KPP filed a Petition to Intervene, and was granted intervention on February 19, 2025.

3. On February 14, 2025, KEPCo filed a Petition to Intervene, and was granted intervention on February 20, 2025.

4. On April 29, 2025, the Joint Applicants, Commission Staff, and Intervenors, as Joint Movants, filed a Joint Motion for Procedural Schedule. On May 6, 2025, the Commission approved the Procedural Schedule which set forth relevant deadlines and milestones for the above-captioned matter.

5. On May 29, 2025, Joshua Dan filed Revised Testimony, and supporting exhibits JED-1_revised, JED-3_revised and JED-4_revised on behalf of Wheatland.

6. On June 2, 2025, Bruce W. Mueller filed Revised Testimony and supporting exhibits BWM-2_revised and BWM-3_revised on behalf of Wheatland.

7. On June 5, 2025, Tim Rehagen filed Direct Testimony on behalf of Staff, in which he recommended the Commission approve Wheatland's revised LAC rate, revised FBR, and revised Protocols with no changes or conditions. When addressing Joint Applicant's request to change the LAC in the LADS tariff from \$1.99 to \$3.09 per kW demand Mr. Rehagen concluded "...that Wheatland's revised LAC rate calculation is just and reasonable and, accordingly, recommends its approval by the Commission."¹ With regard to Joint Applicant's request in the revised FBR and revised Protocols, Mr. Rehagen concluded, "... the proposed FBR mechanism is just and reasonable and therefore, recommends that the Commission approve Wheatland's revised 34.5kV FBR template along with its revised 34.5kV Protocols."²

¹ Prefiled Direct Testimony of Tim Rehagen, Docket No. 25-SEPE-309-TAR, p. 6, lines 11-12 (filed June 5, 2025).

² *Id.* at p. 7 line 20 through p. 8 line 2.

8. None of the intervenors in the above-captioned matter filed any direct testimony in the docket, nor cross-answering testimony disputing the requests of the Joint Applicants and the Staff's recommendations that the rate of \$3.09 per kW demand, the FBR, and Protocols, are just and reasonable. Additionally, there are not any objections to Wheatland's Revised Testimony or requests present on the record.

9. As set forth in the approved Procedural Schedule, there is no additional opportunity for Staff or other intervenors to file additional testimony.

10. WHEREFORE, Joint Movants respectfully request that the Commission cancel the remaining milestones on the Procedural Schedule, and issue an Order based on the written record of the above-captioned matter.

Respectfully submitted,

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VERIFICATION

Taylor P. Calcara, of lawful age, being first duly sworn on oath states:

That he is counsel for Sunflower Electric Power Corporation; that he has read the foregoing pleading and knows the contents thereof; and that the facts therein are true and correct to the best of his knowledge, information, and belief.

/s/ Taylor P. Calcara
Taylor P. Calcara

CERTIFICATE OF SERVICE

I do hereby certify that on the 24th day of June, 2025, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing *Joint Motion* with an electronic copy e-mailed to:

/s/ Amanda Wray

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