

**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 Update its Local Access Delivery
Service Tariff Pursuant to the 34.5 kV Formula
Based Rate Plan Approval in Docket No. 16-MKEE-
023-TAR

Docket No. 20-PLCE-434-TAR

**JOINT MOTION FOR PROCEDURAL SCHEDULE,
DISCOVERY ORDER, PROTECTIVE ORDER**

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

1. On April 27, 2020, Prairie Land filed its Application seeking approval to update its Local Access Delivery Service (“LADS”) tariff pursuant to the 34.5kV Formula-Based Rate plan (“34.5kV FBR”) established and approved by the Commission in Docket No. 16-MKEE-023-TAR (“16-023 Docket”).
2. On May 5, 2020, KPP filed a petition to intervene in this docket; further, that on May 8, 2020, KMEA filed its petition to intervene. Also, KEPCo entered an appearance by and through its legal counsel, Susan B. Cunningham, on the 13th day of May, 2020.
3. In informal discussions between parties, Prairie Land, Staff, KEPCo, KPP and KMEA indicated their willingness to collaborate on a schedule that adheres to the 34.5kV FBR Protocols

(attached as Exhibit B to the Commission Order approving Prairie Land's 34.5kV FBR in the 16-023 Docket), a document that sets out the guidelines for submittal and review of the 34.5kV FBR Annual Update filings.

4. 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	10 days prior to Technical Conference Date
Technical Conference, if necessary	Tuesday, July 7, 2020, 9:00 a.m.
Deadline for Issuing Discovery	
Status Telephone Conference	Thursday, August 20, 2020, 3:00 p.m.
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.	Tuesday August 25, 2020
Prairie Land files rebuttal testimony, if necessary	Wednesday, September 9, 2020
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.	Thursday, September 24, 2020
A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 150-day Order.	Tuesday, September 29, 2020
Final Order issued if the matter goes to evidentiary hearing	Saturday, October 24, 2020

5. In addition, the parties desire to engage in the discovery process for this docket.

WHEREFORE, Joint Movants respectfully request the Commission to grant this Joint Motion, approving the procedural schedule set forth above, issuing a Discovery Order and Protective Order, and for any other relief the Commission deems just and reasonable.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing entry of appearance was electronically served on the 18th day of May, 2020, to the following named persons appearing on the commission's service list as last modified on the 18th of May, 2020.

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