

**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. 21-SEPE-  
049-TAR

Docket No. 23-PLCE-789-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, 2023, 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. 21-SEPE-049-TAR (“21-049 Docket”).

2. On May 2, 2023, KMEA filed an Entry of Appearance in this docket through its General Counsel, Terri Pemberton; further, on May 9, 2023, KEPCo entered an appearance by and through its legal counsel, Susan B. Cunningham KPP filed its petition to intervene. Also, KPP filed a Petition to Intervene on the 11<sup>th</sup> day of May, 2023.

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

(appended to the April 15, 2021 Commission Order Approving Unanimous Settlement Agreement as Attachment A1 to Exhibit A in the 21-049 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:

<b>Action</b>	<b>Date and Time</b>
Staff/intervener questions submitted to Prairie Land	5:00 p.m. Monday, June 26, 2023
Technical Conference, if necessary	9:00 a.m. Thursday, July 6, 2023
Status Telephone Conference	9:00 a.m. Tuesday, August 15, 2023
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.	Thursday, August 24, 2023
Prairie Land files rebuttal testimony, if necessary	Friday, September 08, 2023
Deadline for Issuing Discovery	Monday, September 15, 2023
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.	Tuesday, September 26, 2023
A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 150-day Order.	October 2, 2023
Final Order issued if the matter goes to evidentiary hearing	Tuesday, October 24, 2022

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 17th day of May, 2023, to the following named persons appearing on the commission's service list as last modified on the 17th of May, 2023.

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