

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

In the Matter of the Application of Sunflower Electric)
Power Corporation for an Order Approving (i))
Continued Use of the Target Financial Metric Ratio) Docket No. 17-SEPE-415-TAR
Levels Used in, and (ii) Amendments to, its)
Commission-Approved Formula-Based Rate for)
Recovery of Transmission Costs)

JOINT MOTION FOR EXTENSION OF SUSPENSION ORDER

Sunflower Electric Power Corporation (“Sunflower”) and the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively)(collectively referred to as “Joint Movants”) hereby move the Commission for an Order extending the April 4, 2017 Suspension Order (“Suspension Order”) for 120 days. In support of their motion, Joint Movants state the following:

1. On March 16, 2017, Sunflower filed its Application seeking approval of (i) continued use of the current levels of Debt Service Coverage (“DSC”) and Times Interest Earned Ratio (“TIER”) target metrics in Sunflower’s Formula-Based Rate for Recovery of Transmission Costs (the “TFR”), which was previously approved by the Commission in Docket No. 13-SEPE-701-TAR (the “13-701 Docket”), and (ii) amendments to the TFR to allow adjustments in the TFR for Southwest Power Pool, Inc. (“SPP”) competitively bid transmission projects compelled by Federal Energy Regulatory Commission (“FERC”) Order 1000.¹

2. The Commission’s April 4, 2017 Suspension Order suspended the effectiveness of the Application in this proceeding until November 13, 2017.

¹ Application, Introductory Paragraph, Docket No. 17-SEPE-415-TAR (filed March 16, 2017).

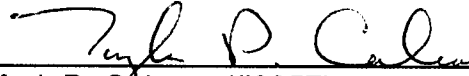
3. Sunflower's request for TFR competitive bid adjustments is unique and complex. Sunflower and Staff have had extensive informal discussions regarding Sunflower's request for adjustments to its TFR. Both parties have worked collaboratively towards a revised structure of such adjustments, but have not finalized the exact details. Once the adjustments to the template are finalized, Sunflower will revise its request for such adjustments and file a Supplemental Application. Sunflower does not intend to revise its request for continued use of the current levels of DSC and TIER in the TFR.

4. Given the nature of the requested relief as to the proposed TFR adjustments, and the ongoing collaboration between Sunflower and Staff, both parties agree that more time is needed in the procedural timeline of this proceeding. Sunflower has requested continued use of its DSC and TIER level, so an extension will not negatively affect that request. In addition, even with the requested extension, Sunflower would still have ample time to incorporate the revised TFR template in its 2019 Annual Update filing on September 24, 2018 because there are no FERC Order 1000 projects to be bid prior to that time.

5. For those reasons, the Joint Movants request a 120 day extension of the Suspension Order to March 13, 2018.

WHEREFORE, Joint Movants respectfully request the Commission issue an order granting this Joint Motion, extending the Suspension Order to March 13, 2018, and any other such relief as the Commission determines necessary.

Respectfully submitted,



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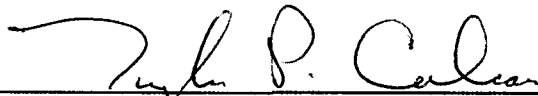
**COUNSEL FOR SUNFLOWER ELECTRIC
POWER CORPORATION**

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF BARTON) ss:

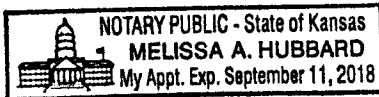
Taylor P. Calcara, of lawful age, being first duly sworn on oath states:

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.



Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 19th day of October, 2017.





Notary Public

My Commission expires: 9-11-2018



Robert Vincent (#26028)
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COUNSEL FOR COMMISSION STAFF

VERIFICATION

STATE OF KANSAS)
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COUNTY OF BARTON) ss:

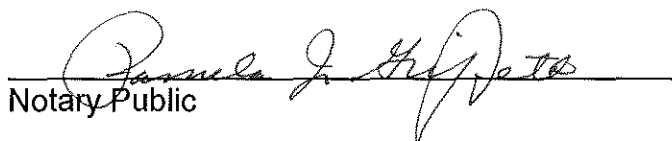
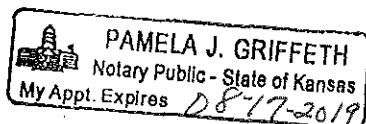
Robert Vincent, of lawful age, being first duly sworn on oath states:

That he is counsel for Commission Staff; 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.



Robert Vincent

SUBSCRIBED AND SWORN to before me this 19th day of October, 2017.



Notary Public

My Commission expires: August 17, 2019

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Joint Motion was forwarded via e-mail to the following parties on this 19th day of October, 2017:



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