

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

In the Matter of the Application of Western Cooperative )  
Electric Association, Inc. Seeking Commission Approval to )  
Update Its Local Access Delivery Service Tariff Pursuant to ) Docket No. 23-WSTE-791-TAR  
the 34.5kV Formula Based Rate Plan Approved in Docket )  
No. 21-SEPE-049-TAR )

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

COMES NOW, the Western Cooperative Electric Association, Inc. (“Western”), the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively), the Kansas Power Pool (“KPP”), the 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, a discovery order, and protective order in the above-captioned matter. In support of their motion, Joint Movants state the following:

1. On May 1, 2023, Western filed its Application seeking approval to update its local access delivery service tariff pursuant to the 34.5kV formula-based rate plan (“34.5kV FBR”).
2. On May 2, 2023, KMEA filed an Entry of Appearance.
3. On May 9, 2023, KEPCo filed an Entry of Appearance.
4. On May 11, 2023, KPP filed a Petition to Intervene.
5. In informal discussions between parties, Western, Staff, KPP, KMEA, and KEPCo indicated their willingness to collaborate on a schedule that adheres to the 34.5kV FBR protocols.
6. 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>
Technical Conference, if necessary	July 11 <sup>th</sup> at 3:00pm at Western's Offices. Western will accommodate those who cannot attend in person.
Status telephone conference	August 21st at 3:00pm; call in information to be distributed later.
Staff and Interveners complete the review of the Annual Update, and either file a Report and Recommendation 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.	August 29 <sup>th</sup>
Western files rebuttal testimony, if necessary	September 13 <sup>th</sup>
Discovery Cutoff	September 20 <sup>th</sup>
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.	September 28 <sup>th</sup>
A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 150 day Order.	October 3rd at 9:00 am
Final Order issued if the matter goes to evidentiary hearing.	October 30 <sup>th</sup>

7. In addition, the parties request the Commission issue a Discovery Order and Protective Order in this proceeding.

WHEREFORE, Joint Movants respectfully request the Commission issue an order granting this Joint Motion, approving the procedural schedule as set forth above, issuing a discovery order and protective order and for any other relief the Commission deems just and reasonable.

Respectfully submitted,

s/ Taylor P. Calcara

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**COUNSEL FOR THE KANSAS MUNICIPAL  
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**VERIFICATION**

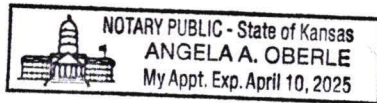
STATE OF KANSAS            )  
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COUNTY OF BARTON        )        ss:

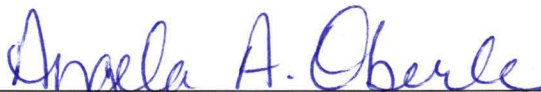
Taylor P. Calcara, of lawful age, being first duly sworn on oath states:

That he is counsel for Western Cooperative Electric Association, Inc.; 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 18<sup>th</sup> day of May, 2023



  
\_\_\_\_\_  
Angela A. Oberle, Notary Public

My Commission expires: April 10, 2025.



## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this 18<sup>th</sup> day of May, 2023, the above and foregoing Joint Motion for Procedural Schedule was submitted to the following parties via electronic mail:

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