

**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. 24-PLCE-684-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 Municipal Energy Agency (“KMEA”), Kansas Electric Power Cooperative, Inc. (“KEPCo”), and KPP Energy, a Municipal Energy Agency (“KPP”), (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 30, 2024, 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 7, 2024, the following pleadings have been filed in the instant Docket: KMEA filed an Entry of Appearance in this docket through its General Counsel, Terri Pemberton; KEPCo entered an appearance by and through its legal counsel, Susan B. Cunningham; and KPP filed its petition to intervene.

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:

Action	Date and Time
Staff/intervener questions submitted to Prairie Land	By Friday, June 28, 2024.
Technical Conference, if necessary	July 9, 2024, at 11 AM
Status Telephone Conference	August 20, 2024, at 9 AM
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.	Wednesday, August 28, 2024
Prairie Land files rebuttal testimony, if necessary	Friday, September 12, 2024
Deadline for Issuing Discovery	Thursday, September 19, 2024
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.	By September 27, 2024
A one-day evidentiary hearing in case it is needed based upon the Commission 150-day Order.	September 30, 2024, at 9 am.
Final Order issued if the matter goes to evidentiary hearing	Thursday, October 31 or Tuesday, November 5, 2024

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 22nd day of May 2024, to the following named persons appearing on the commission's service list as last modified on the 7th of May 2024.

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