

**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. 25-WSTE-389-TAR
the 34.5kV Formula Based Rate Plan Approved in Docket)
No. 21-SEPE-049-TAR)

JOINT MOTION FOR PROCEDURAL SCHEDULE

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), KPP Energy, a Municipal Energy Agency (“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 in the above-captioned matter. In support of their motion, Joint Movants state the following:

1. On April 30, 2025, 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, 2025, KMEA filed an Entry of Appearance.
3. On May 19, 2025, KEPCo filed an Entry of Appearance.
4. On May 23, 2025, KPP filed an Entry of Appearance.
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:

STAFF'S PROPOSED DATE	STAFF'S PROPOSED TIME	ACTION
Thursday, May 1, 2025		"Day 1": day after the filing date but not prior to March 1 (no action needed)
Thursday, July 3, 2025*	5:00 PM	Questions submitted to Western (10 days before Technical Conference-Day 75)
Thursday, July 17, 2025	4:00PM	Technical Conference, if necessary (Day 75)
Thursday, August 21, 2025*	2:00 PM	Status Telephone Conference (Day 110-115)
Friday, August 29, 2025	5:00 PM	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 riling 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. (Day 120)
Friday, September 12, 2025*	5:00 PM	Western files rebuttal Testimony, if necessary (Day 135)
Friday, September 19, 2025		Deadline for Issuing Discovery (Day 142)
Thursday, September 25, 2025*		Commission issues an order either approving the rate adjustments based upon the paper record or notifying the parties an evidentiary hearing will be held. (Day 150)
Monday, September 29, 2025	9:00 AM, via Zoom	A one-day Evidentiary Hearing, if needed, based upon the Commission 150-day order. (Day 155-159)
Tuesday, October 28, 2025		Final Commission Order, if Evidentiary Hearing is held. (Day 180)

WHEREFORE, Joint Movants respectfully request the Commission issue an order granting this Joint Motion, approving the procedural schedule as set forth above, 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
ENERGY AGENCY**

VERIFICATION

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.

/s/ Taylor P. Calcara

Taylor P. Calcara

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 8th day of July, 2025, the above and foregoing Joint Motion for Procedural Schedule was submitted to the following parties via electronic mail:

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