

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of)
Southern Pioneer Electric Company for) Docket No. 15-SPEE- 161 -RTS
Approval to Make Certain Changes in its)
Charges for Electric Service.)

JOINT MOTION FOR WAIVER OF FILING REQUIREMENTS

Southern Pioneer Electric Company (Southern Pioneer), the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively), and the Citizens' Utility Ratepayer Board (CURB) (collectively referred to as Joint Movants) hereby move the Commission for an Order waiving certain filing requirements contained in K.A.R. 82-1-231, with respect to Southern Pioneer's Application seeking recovery of revenue for services provided to its retail consumers and third-party (local access) customers utilizing Southern Pioneer's 34.5 kV sub-transmission system. In support of its motion, Joint Movants state the following:

1. On May 1, 2014,¹ Southern Pioneer submitted its initial annual Debt Service Coverage (DSC) Formula Base Ratemaking (FBR) Pilot Plan (DSC-FBR Plan) filing to reduce retail rates charged to its consumers, in accordance with the findings and approval set forth in Docket No. 13-MKEE-452-MIS (the 13-452 Docket). The DSC-FBR Plan, by design, excludes from recovery costs associated with Southern Pioneer's 34.5 kV sub-transmission system, and contains protocols that include minimum filing requirements (MFR) approved by the Commission in the 13-452 Docket, and which Southern Pioneer must provide when making its annual DSC-FBR Plan filings.

¹ Docket No. 14-SPEE-507-RTS. The Commission issued its Final Order in this matter on July 31, 2014.

2. The MFRs contained in the protocols were established, in part, with the understanding that the Commission has traditionally granted waiver of its MFRs in the general rate proceedings relating to Southern Pioneer's service territory,² because the MFRs contained in K.A.R. 82-1-231 are more applicable to traditional investor owned utilities.³ In its filing to recover costs associated with its 34.5 kV sub-transmission system, Southern Pioneer wishes to use MFRs similar to those contained in the DSC-FBR Plan protocols.

3. Simultaneous with the filing of this Motion, Southern Pioneer is filing its Application seeking recovery of the revenues for service relating to its 34.5 sub-transmission system that were excluded from the DSC-FBR filing.

4. Because the 34.5 kV sub-transmission filing is in complement to and consistent with the DSC-FBR Plan filing made on May 1, 2014, and in light of the fact that the Commission has traditionally approved waiver of the K.A.R. 82-1-231 MFRs, Joint Movants agree that it is appropriate to seek waiver of the MFRs contained in K.A.R. 82-1-231 for Southern Pioneer's 34.5 kV sub-transmission filing. Joint Movants have attached to this Motion as **Attachment A**, the items identified as necessary for a thorough investigation on the Application.

WHEREFORE, Joint Movants respectfully request the Commission grant this motion waiving the filing requirements of K.A.R. 82-1-231 and approving the use of the modified filing requirements attached hereto.

Respectfully submitted,

² Docket No. 08-MKEE-816-MIS. See also, Docket No. 13-MKEE-380-RTS.

³ Additionally, because Southern Pioneer is not a Cooperative, the MFRs of K.A.R. 82-1-231a do not apply.

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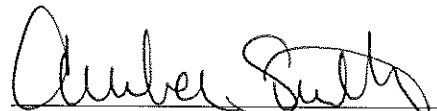
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ATTORNEYS FOR CURB

Attachment A

Southern Pioneer Local Access Charge (LAC) Cost of Service (COS) Filing Requirements

1. An Application describing the revenue adjustment requested and the proposed changes in rates.
2. Southern Pioneer's complete RUS (or CFC) Form 7 for Historical Test Year used (2013).
3. LAC COS Exhibit detailing calculations of:
 - (a) Total LAC Revenue Requirement and the resultant per unit LAC rate,
 - (b) Adjustment in revenues being requested, and
 - (c) Allocation of the retail portion of the LAC Revenue Adjustment among retail classes
4. Summary Trial Balance for period ending December 2013
5. Payroll/Labor Distribution History (totals by GL account) for January – December 2013.
6. Change in 34.5 Transmission Plant in Service (YE 2010 - YE 2013)
7. Outstanding Debt balances
8. Operating Statements and Balance Sheets (2013)
9. Comparison of Monthly Bills
10. Tariff Sheets (Clean and Red-Lined Version)
11. Pre-filed Direct Testimony in Support of Exhibits and Workpapers.