

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

In the Matter of the Application of The Victory Electric)
Cooperative Association, Inc., Seeking Commission)
Approval to Update Its Local Access Delivery Service) Docket No. 23-VICE-793-TAR
Tariff Pursuant to 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 Victory Electric Cooperative Association, Inc. (“Victory”), the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively), 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, 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 Victory 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. In informal discussions between parties, Victory, Staff, KMEA, and KEPCo indicated their willingness to collaborate on a schedule that adheres to the 34.5kV FBR protocols.
5. 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
Technical Conference, if necessary	July 14 th at 9:30am at the Offices of Victory. Victory will accommodate those who cannot attend in person.
Status telephone conference	August 22 nd at 10:00 am; 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 th
Victory files rebuttal testimony, if necessary	September 13 th
Discovery Cutoff	September 20 th
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 th
A one-day evidentiary hearing will be set during this time in case it is needed based upon the Commission 150 day Order.	October 6 th at 9:00am
Final Order issued if the matter goes to evidentiary hearing.	October 30 th

6. 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

Taylor P. Calcara (#25561)
Jeffrey M. Kuhlman (#26865)
Watkins Calcara, Chtd.
1321 Main Street, Suite 300
P.O. Drawer 1110
Great Bend, Kansas 67530
(620) 792-8231 telephone
(620) 792-2775 facsimile
tcalcara@wcrf.com
jkuhlman@wcrf.com

**COUNSEL FOR THE VICTORY ELECTRIC
COOPERATIVE ASSOCIATION, INC.**

/s/ Brett Berry

Brett Berry
Walker Hendrix
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604
(785) 271-3273
(785) 271-3157
b.berry@kcc.ks.gov
w.hendrix@kcc.ks.gov

COUNSEL FOR COMMISSION STAFF

/s/ Susan B. Cunningham

Susan B. Cunningham (#14083)
Senior Vice President, Regulatory and Government
Affairs, and General Counsel
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
O: (785) 271-4815
M: (785) 817-1864
scunningham@kepco.org

**COUNSEL FOR THE KANSAS ELECTRIC
POWER COOPERATIVE, INC.**

/s/ Terri J. Pemberton

Terri J. Pemberton (#23297)
General Counsel
Kansas Municipal Energy Agency
6500 W 95th Street
Overland Park, KS 66212-1431
Office: (913) 374-1365
pemberton@kmea.com

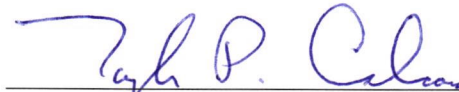
**COUNSEL FOR THE KANSAS MUNICIPAL
ENERGY AGENCY**

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF BARTON) ss:

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

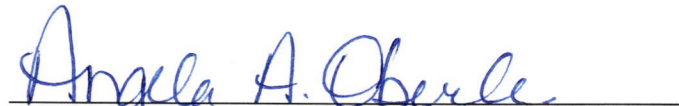
That he is counsel for The Victory Electric Cooperative Association, Inc.; that he has read the foregoing pleading and knows the contents thereof; and, that the facts therein are true and correct to the best of his knowledge, information and belief.



Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 23rd 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 23rd day of May, 2023, the above and foregoing Joint Motion For Procedural Schedule was submitted to the following parties via electronic mail:

Brett Berry, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604
b.berry@kcc.ks.com

Walker Hendrix, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604
w.hendrix@kcc.ks.com

Tim Rehagen, Senior Auditor, Utilities
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604
t.rehagen@kcc.ks.com

Susan B. Cunningham, SVP
Regulatory and Government Affairs, General Counsel
Kansas Electric Power Co-Op, Inc.
600 SW Corporate View
P.O. Box 4877
Topeka, KS 66604-0877
scunningham@kepco.org

Mark Doljac, Dir Rates and Regulation
Kansas Electric Power Co-Op, Inc.
600 SW Corporate View
P.O. Box 4877
Topeka, KS 66604-0877
mdoljac@kepco.org

Rebecca Fowler, Manager, Regulatory Affairs
Kansas Electric Power Co-Op, Inc.
600 SW Corporate View
P.O. Box 4877
Topeka, KS 66604-0877
rfowler@kepco.org

Brad Hutton, Financial/Regulatory Specialist
Kansas Electric Power Co-Op, Inc.
600 SW Corporate View
P.O. Box 4877
Topeka, KS 66604-0877
bhutton@kepco.org

Paul Mahlberg, General Manager
Kansas Municipal Energy Agency
6300 W. 9th Street
Overland Park, KS 66212-1431
mahlberg@kmea.org

Terri J. Pemberton, General Counsel
Kansas Municipal Energy Agency
6300 W. 9th Street
Overland Park, KS 66212-1431
pemberton@kmea.com

Darren Prince, Manager, Regulatory & Rates
Kansas Municipal Energy Agency
6300 W. 9th Street
Overland Park, KS 66212-1431
prince@kmea.com

Shane Laws, CEO
Victory Electric Cooperative Assn., Inc.
3230 N. 14th Street
P.O. Box 1335
Dodge City, KS 67801-1335
accounting@victoryelectric.net

Angela Unruh
Victory Electric Cooperative Assn., Inc.
3230 N. 14th Street
P.O. Box 1335
Dodge City, KS 67801-1335
angela@victoryelectric.net

Jeffrey M. Kuhlman, Attorney
Watkins Calcara, Chtd.
1321 Main Street, Suite 300
P.O. Drawer 1110
Great Bend, KS 67530
jkuhlman@wcrf.com

s/ Taylor P. Calcara
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