

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

JAN 08 2013

by
State Corporation Commission
of Kansas

In the Matter of the Application of Mid-Kansas)
Electric Company, LLC for Approval of a Debt)
Service Coverage Ratemaking Pilot Plan for the) Docket No. 13-MKEE-452-MIS
Geographic Territory Served by its Member-)
Owner Southern Pioneer Electric Company.)

MOTION FOR PROCEDURAL SCHEDULE

Mid-Kansas Electric Company, LLC (Mid-Kansas), hereby moves the State Corporation Commission of the State of Kansas (Commission or KCC) to establish a procedural schedule in this matter. In support of its motion, Mid-Kansas states:

1. Concurrently with the filing of this Motion, Mid-Kansas, on behalf of its member Southern Pioneer Electric Company (Southern Pioneer), filed with the Commission an Application, with supporting testimony, seeking approval of a Debt Service Coverage (DSC) Ratemaking Pilot Plan for the geographical service territory served by Southern Pioneer.

2. The Application does not request a “changed rate, joint rate, toll, charge or classification or schedule of charges, or any rule of regulation or practice pertaining to the service or rates” of Mid-Kansas, and therefore, K.S.A. 66-117 does not apply. As such, there is no specific statutory time schedule applicable to this Application. However, there is a need by the applicant for a timely resolution of its request so that future rate applications can be developed accordingly. Under the terms of the Commission’s Order in its most recent Mid-Kansas Southern Pioneer division rate case in Docket No. 12-MKEE-380-RTS, Mid-Kansas will be filing an abbreviated rate case for the Southern Pioneer division on or before June of 2013.¹ It

¹ The abbreviated case will be filed by Southern Pioneer if, at that time, the Commission has approved the transfer of the certificate and retail customers to Southern Pioneer in Docket No. 13-MKEE-447-MIS.

is anticipated that a general rate case will need to be filed shortly thereafter. Therefore, Mid-Kansas is requesting that a procedural schedule be adopted that will bring this matter to a timely conclusion, even though there is no statutory deadline.

3. This Application for a DSC Ratemaking Pilot Plan posits conceptual regulatory and policy issues. Unlike a rate case, it does not present voluminous schedules or involve a time-consuming financial audit. Mid-Kansas suggests a 180-day timeframe is an appropriate period of time for Staff review and Commission determination in this matter. Although, at this time, it is unknown how extensive the procedural schedule needs to be, Mid-Kansas has developed a proposed schedule that includes testimony filing, a hearing and briefs. If a modified process is preferred by the Commission, the parties can consider that and provide input at the initial prehearing conference.

4. Mid-Kansas believes a 180-day timeframe is appropriate as it allows Staff nine weeks to examine the proposed plan and file testimony. As can be seen in the table below, the proposed schedule allows for a two-day evidentiary hearing, if necessary, a full-briefing schedule, and approximately thirty days for the Commission to issue its Order. Additionally, the proposed schedule will result in a Commission determination on the appropriateness of the DSC Ratemaking Pilot Plan before the next general rate proceeding for Southern Pioneer must be filed.

5. Based on these facts Mid-Kansas has developed for Commission consideration the proposed schedule set forth below.

Filing Date	January 8, 2013
Pre-hearing briefs, if necessary	(Fri) March 1, 2013
Staff/Intervenor Testimony	(Fri) March 8, 2013
Cross-Answering Testimony	(Fri) March 15, 2013
Mid-Kansas Rebuttal Testimony	(Thurs) April 4, 2013
Settlement Conference	(Thurs) April 18, 2013
Discovery Cut-off	(Mon) April 22, 2013
Motion Cut-off	(Mon) April 22, 2013
List of Contested Issues	(Mon) April 22, 2013
Prehearing Conference	(Wed) April 24, 2013
Evidentiary Hearing	(Mon-Tues) April 29-30, 2013
Initial Post-Hearing Brief	(Tues) May 14, 2013
Staff/Intervenors Responsive Briefs	(Wed) May 29, 2013
Company Reply Brief	(Mon) June 10, 2013
Order Due Date ²	(Mon) July 8, 2013

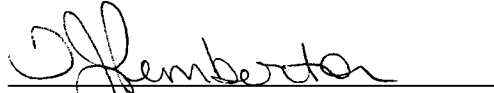
6. WHEREFORE, Mid-Kansas respectfully requests that the Commission convene a prehearing conference as soon as possible to reach consensus with the parties on the procedural schedule for this matter.

Respectfully submitted,

Mark D. Calcara, (#09957)
 Watkins Calcara, Chtd.
 Suite 300, 1321 Main Street
 P. O Drawer 1110
 Great Bend, Kansas 67530
 (620) 792-8231 telephone

² 180 days runs on Sunday, July 7, 2013. Therefore, the Order due date will be Monday, July 8, 2013.

(620) 792-2775 facsimile
mcalcara@wcrf.com



Glenda Cafer (#13342)

(785) 271-9991

Terri Pemberton (#23297)

(785) 232-2123

CAFER LAW OFFICE, L.L.C.

3321 SW 6th Avenue

Topeka, Kansas 66606

(785) 233-3040 facsimile

glenda@caferlaw.com

terri@caferlaw.com

**COUNSEL FOR MID-KANSAS ELECTRIC
COMPANY, LLC**