

**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. 16-WSTE-496-TAR
the 34.5kV Formula Based Rate Plan Approved in Docket)
No. 16-MKEE-023-TAR)

JOINT MOTION FOR PROCEDURAL SCHEDULE

Western Cooperative Electric Association, Inc. (“Western”) the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively), Kansas Electric Power Cooperative, Inc. (“KEPCo”), and Linde, Inc. (“Linde”) (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 May 2, 2016, 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”) approved in Docket No. 16-MKEE-023-TAR.

2. On May 9, 2016, KEPCo filed an Entry of Appearance, and on May 16, 2016, Linde filed an Entry of Appearance, which serve as each entity’s Petition to Intervene.

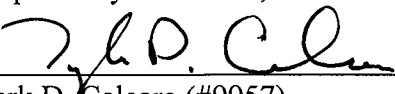
3. In informal discussions between parties, Western, Staff, KEPCo and Linde indicated their willingness to collaborate on a schedule that adheres to the 34.5kV FBR protocols.

3. 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 11 th at 9:00 am at Western's Offices. Western 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 30 th
Western files rebuttal testimony, if necessary	September 14 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 29 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 9:00 am
Final Order issued if the matter goes to evidentiary hearing.	October 31 st

WHEREFORE, Joint Movants respectfully request the Commission issue an order granting this Joint Motion and approving the procedural schedule set forth above.

Respectfully submitted,


 Mark D. Calcara (#9957)
 Taylor P. Calcara (#25561)
 Watkins Calcara, Chtd.
 1321 Main Street, Suite 300
 P.O. Drawer 1110
 Great Bend, Kansas 67530
 (620) 792-8231 telephone
 (620) 792-2775 facsimile
mcalcara@sunflower.net
tcalcara@wcrf.com

**COUNSEL FOR WESTERN COOPERATIVE
ELECTRIC ASSOCIATION, INC.**

/s/ Michael Duenes

Michael Duenes (#26431)
Andrew French (#24680)
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604
(785) 271 3181
(785) 271-3361
m.duenes@kcc.ks.gov
a.french@kcc.ks.gov

COUNSEL FOR COMMISSION STAFF

W. P. Collins for

William Riggins (#12080)
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
(785) 271-4833 telephone
(785) 271-4888 fax
briggins@kepco.org

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

W. P. Collins for

Curtis M. Irby (#07274)
155 N. Market Street, Suite 1050
Wichita, Kansas 67202
Telephone: (316) 262-5181
Facsimile: (316) 264-6860
cmirby@sbcglobal.net

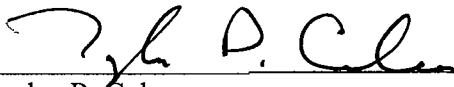
COUNSEL FOR LINDE, INC.

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF BARTON)

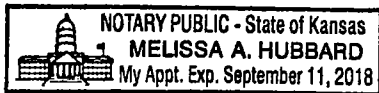
Taylor P. Calcara, of lawful age, being first duly sworn on oath states:


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.



Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 10th day of June, 2016.





Notary Public

My Commission expires: 9-11-2018

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Joint Motion for Procedural Schedule was forwarded via e-mail to the following parties on this 10th day of June, 2016:

Curtis M. Irby, Attorney
GLAVES IRBY & RHOADS
1050 Market Center
155 N. Market
Wichita, Kansas 67202
cmirby@sbcglobal.net

Jeffrey Pollock
J. POLLOCK, INCORPORATED
12647 Olive Boulevard, Suite 585
St. Louis, Missouri 63141-6344
JCP@JPOLLOCKINC.COM

Michel Duenes, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, Kansas 66604-4027
m.duenes@kcc.ks.gov

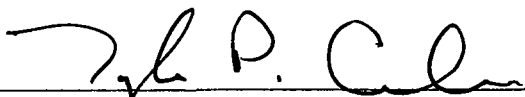
Andrew French, Senior Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, Kansas 66604-4027
a.french@kcc.ks.gov

William G. Riggins
Sr. Vice Pres and General Counsel
Kansas Electric Power Co-Op, Inc.
P.O. Box 4877
Topeka, Kansas 66604-0877
briggins@kepco.org

Darrin Lynch, Manager
Western Cooperative Electric Assn., Inc.
635 S. 13th Street
P.O. Box 278
Wakeeney, Kansas 67672-0278
darrinl@westerncoop.com

Stacey Malsam
Manager of Accounting & Finance
Western Cooperative Electric Assn., Inc.
635 S. 13th Street
P.O. Box 278
Wakeeney, Kansas 67672-0278
staceym@westerncoop.com

Samuel Feather
Office of General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, Kansas 66604-4027
s.feather@kcc.ks.gov



Taylor P. Calcara
Counsel for Western Cooperative Electric
Association, Inc.