20191022124227 Filed Date: 10/22/2019 State Corporation Commission of Kansas

## CAFER LAW LLC

## 3321 SW Sixth Avenue Topeka, Kansas 66606

--ENERGY AND TELECOM LAW--

October 22, 2019

Ms. Lynn M. Retz Secretary to the Commission Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, Kansas 66604

RE: Southern Pioneer Electric Company

Notice of Intent to File Application in Docket No. 19-SPEE-240-MIS

Ms. Retz -

On December 20, 2018, Southern Pioneer Electric Company (Southern Pioneer) filed with the Commission a Notice and Initiation of Docket, wherein it notified the Commission of Southern Pioneer's desire to continue the Debt Service Coverage (DSC) and 34.5kV Formula Based Rate (FBR) plans previously approved by the Commission. The Commission docketed the notice in Docket No. 19-SPEE-240-MIS in order to establish a placeholder for the subsequent filing of a formal application.

As part of its *Order Acknowledging Notice of Intent to Continue Formula-Based Ratemaking Plan*, the Commission ordered Southern Pioneer to comply with the provisions of K.A.R. 82-1-201 *et seq.*, and noted that the "suspension period set forth in K.S.A. 66-117(c) shall be tolled and not commence until Southern Pioneer files formal application."

On August 2, 2019, Southern Pioneer provided the Commission with its notice of intent to file a formal FBR Plan application, which meant that Southern Pioneer would need to file tis application no sooner than September 1, 2019, and no later than October 31, 2019. Due to certain delays, Southern Pioneer does not anticipate filing by that deadline so is providing this updated notice of intent notifying the Commission of Southern Pioneer's intent to file its application no sooner than November 21, 2019.

If you have any questions, please contact Chantry Scott at (620) 424-5216, Randall Magnison at (620)424-5211, or me at (785)640-5551.

Sincerely,

|s| Glenda Cafer

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