

**BEFORE THE STATE 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) Docket No. 18-VICE-479-TAR
Access Delivery Service Tariff Pursuant to the)
34.5kV Formula Based Rate Plan Approved in)
Docket No. 16-MKEE-023-TAR.)

JOINT MOTION FOR PROCEDURAL ORDER

Victory Electric Cooperative Association, Inc. (Victory), the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively), and Kansas Electric Power Cooperative, Inc. (KEPCo) (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 its motion, Joint Movants state the following:

1. On May 1, 2018, Victory filed its Application seeking approval to make changes to its Local Access Delivery Service (LADS) charge assessed to wholesale users of Victory's 34.5KV system.¹ The filing was made in accordance with the 34.5kV Formula Based Rate (34.5kV FBR) plan established and approved by the Commission in Docket No. 16-MKEE-023-TAR.²

2. The 34.5kV FBR plan, as approved, contains a timeline under which the annual 34.5kV filings will be filed and reviewed. Specifically, the timeline is set forth in the 34.5kV FBR plan Protocols, which is attached as Exhibit C of Attachment A to the Commission's Order approving the 34.5kV FBR plan.³ For ease of reference, Joint Movants conferred in order to identify the specific dates for each action item identified in the 34.5kV plan timeline, based upon

¹ Application, p. 1.

² Application, p. 1.

³ Order Approving Settlement, Docket No. 16-MKEE-023-TAR, Exh. C pp. 1-2 (Mar. 10, 2016). *See also*, Order Granting Petition for Clarification, Docket No. 16-MKEE-023-TAR, Exh. C pp. 1-2 (Apr. 26, 2016).

the May 1, 2018 filing date and the general timeline approved as part of the 34.5kV FBR plan.

That proposed schedule, as agreed to by Joint Movants, is as follows:

Filing Date	Monday, May 1, 2018
Technical Conference 9:00 a.m. start time	Monday July 9, 2018
Status Call 10:00 a.m. start time	Tuesday August 21, 2018
Staff/Intervenor Report and Recommendation or Testimony	Wednesday August 29, 2018
Victory Rebuttal Testimony, if necessary	Thursday, September 13, 2018
Commission Order (either approving the rate adjustment based upon the paper record or notifying the parties that an evidentiary hearing will be held)	Friday, September 28, 2018
Evidentiary hearing, if necessary	Friday, October 5, 2018 ⁴
Commission Order, if Evidentiary Hearing ⁵	Thursday, October 25, 2018

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

[remainder of page left intentionally blank]

⁴ The protocols provide that in the event an evidentiary hearing is necessary, it should take place 155-159 days from the date of filing. Based on a May 1, 2018 filing date, those days fall on Wednesday, October 3 – Sunday, October 7, 2018. Due to previously existing obligations, October 5, 2018 is the only date available for Joint Movants, collectively. However, Joint Movants are amenable to conducting the evidentiary hearing earlier than prescribed by the Protocols, and are available on Monday, October 1, 2018, if the Commission prefers.

⁵ The Commission's Order date, based on the Protocols, is Sunday, October 28, 2018. Therefore, Joint Movants selected the Commission's last Business Meeting date prior to October 28, 2018 as the Commission's Order due date.

/s/ Terri Pemberton

Terri Pemberton (#23297)
(785) 232-2123
Glenda Cafer (#13342)
(785) 271-9991
CAFER PEMBERTON LLC
3321 SW 6th Avenue
Topeka, Kansas
terri@caferlaw.com
glenda@caferlaw.com

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

/s/ Robert Vincent

Robert Vincent (#26028)
(785) 271-3273
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66606
(785) 271-3167 (fax)
r.vincent@kcc.ks.gov

COUNSEL FOR COMMISSION STAFF

/s/ William G. Riggins

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

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

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above was electronically served, hand-delivered or mailed, postage prepaid, this 9th day of May, 2018 to:

Robert Vincent, Senior Litigation Counsel
Phoenix Anschutz, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027
r.vincent@kcc.ks.gov
p.anschutz@kcc.ks.gov

Elena Larson
Power System Engineering, Inc.
3321 SW Sixth Ave.
Topeka, Kansas 66606
elarson@powersystem.org

William G. Riggins, Sr. Vice Pres & General Counsel
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View (66615)
PO Box 4877
Topeka, Kansas 66604-0877
briggins@kepc.org

Mark Doljac, Dir. Rates & Regulation
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View (66615)
PO Box 4877
Topeka, Kansas 66604-0877
mdoljac@kepc.org

/s/ Terri Pemberton

Terri Pemberton