

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of Sunflower Electric Power)
Corporation's Formula-Based Rate Annual Updates)
and True-Ups for Recovery of Transmission Costs as) Docket No. 14-SEPE-220-TFR
Required by Commission Order in Docket No. 13-)
SEPE-701-TAR.

**SUNFLOWER ELECTRIC POWER CORPORATION'S
MOTION TO APPROVE ADJUSTMENTS**

Sunflower Electric Power Corporation ("Sunflower") hereby files its Motion to Approve Adjustments requesting the Kansas Corporation Commission ("Commission") approve certain adjustments to the revenue requirements in Sunflower's formula-based rate to reflect changes to Sunflower's debt structure. In support of this filing, Sunflower states as follows:

1. On September 24, 2014, Sunflower filed its 2014 Annual Update in the instant docket pursuant to its Open Access Transmission Tariff ("OATT") and formula-based rate protocols. Sunflower incorporates that September 24, 2014, filing into this motion by reference.

2. In that filing, Sunflower explained that in July of 2014 it modified the repayment schedule of certain existing debt thereby extending the debt maturity from December 2016 to December 2033 ("Amend and Extend"), resulting in the re-amortization of principal payments and effectively reducing the annual principal payment amounts originally required in 2014, 2015, and 2016 and lowering Sunflower's annual revenue requirement for the 2015 rate year. The principal payment reduction is a known and certain amount and based on the new amortization schedule.

3. The Amend and Extend effectively lowers Sunflower's annual revenue requirements, but due to the nature and terms of the formula-based rate protocols, Sunflower's ratepayers would not see the benefit of that revenue reduction until 2017.

4. Sunflower, although not required to do so, seeks to adjust the annual revenue requirements to reflect the reduction in annual revenue requirements to more accurately reflect the true revenue requirements.

5. The restructuring of Sunflower's debt is a known and measureable data entry in the formula based rate as is the resulting decrease to the revenue requirement that reflects the debt restructuring.

6. Capturing the benefit of the Amend and Extend now, rather than 2017, results in an immediate, quantifiable benefit to ratepayers and results in a rate that is just and reasonable.

7. Staff has informed Sunflower that it supports the adjustment voluntarily proposed by Sunflower to its formula-based rate.

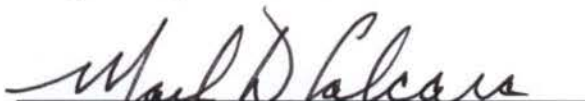
8. On October 8, 2014, Commission Staff requested that Sunflower file a motion requesting approval of the adjustments to the revenue requirements in Sunflower's formula-based rate to reflect changes to Sunflower's debt structure. This filing accommodates that request.

9. For Commission consideration, Sunflower has attached hereto a proposed Order Approving the adjustments to the revenue requirements in Sunflower's formula-based rate to reflect changes to Sunflower's debt structure.

10. Sunflower respectfully requests the Commission adopt the proposed order in its entirety and issue an order on this matter as soon as reasonably possible.

WHEREFORE, for the reasons set forth above, Sunflower Electric Power Corporation requests this motion be granted.

Respectfully submitted,



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

**COUNSEL FOR SUNFLOWER ELECTRIC
POWER CORPORATION**

CERTIFICATE OF SERVICE

I do hereby certify that on the 21st day of October, 2014, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing Sunflower's Motion with an electronic copy e-mailed to:

/s/ Reneé K. Braun

SERVICE LIST

MICHAEL MUIRHEAD, DIRECTOR OF
UTILITIES
CITY OF GARDEN CITY
301 N 8TH ST
PO BOX 998
GARDEN CITY, KS 67846

RANDALL D. GRISELL, ATTORNEY
DOERING & GRISELL, P.A.
124 GRANT AVE
GARDEN CITY, KS 67846

ASHLEY M. BOND, ATTORNEY
DUNCAN & ALLEN
1730 RHODE ISLAND AVENUE NW
SUITE 700
WASHINGTON, DC 20036-3155

GREGG D. OTTINGER, ATTORNEY
DUNCAN & ALLEN
1730 RHODE ISLAND AVENUE NW
SUITE 700
WASHINGTON, DC 20036-3155

N. BETH EMERY
HUSCH BLACKWELL LLP
750 17TH STREET NW
SUITE 900
WASHINGTON, DC 20006

AMBER SMITH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027

MARK DOLJAC, DIR RATES AND
REGULATION
KANSAS ELECTRIC POWER CO-OP,
INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877

WILLIAM G. RIGGINS, SR VICE PRES
AND GENERAL COUNSEL
KANSAS ELECTRIC POWER CO-OP,
INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chair
Jay Scott Emler
Pat Apple

In the Matter of Sunflower Electric Power Corporation's)
Formula-Based Rate Annual Updates and True-Ups for)
Recovery of Transmission Costs as Required by) Docket No. 14-SEPE-220-TFR
Commission Order in Docket No. 13-SEPE-701-TAR.)

ORDER APPROVING ADJUSTMENTS

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (“Commission”) for consideration and decision. Having reviewed the files and records, and being duly advised in the premises, the Commission makes the following findings and conclusions:

1. On September 24, 2014, Sunflower Electric Power Corporation (“Sunflower”) filed its Annual Update with the Commission pursuant to its Open Access Transmission Tariff (“OATT”) protocols. In that filing, Sunflower explained that it had re-amortized certain existing debt, extending the debt maturity from December 2016 to December 2033 (“Amend and Extend”), and effectively lowering Sunflower’s annual revenue requirements for the 2015 rate year by reducing principal payment amounts.

2. On October 14, 2014, Sunflower filed a motion requesting the Commission approve the adjustments to the revenue requirements under Sunflower’s formula-based rate based upon the known and certain amounts it submitted in the September 24, 2014, annual update filing.

3. K.S.A. 66-101b requires every public utility to furnish reasonably efficient and sufficient service at just and reasonable rates.

4. The Commission finds that Sunflower's adjustments to the revenue requirements under the formula-based rate reflects a change that will result in just and reasonable rates. Rather than allowing its Annual Transmission Revenue Requirement to be calculated based on inputs that Sunflower knew were no longer reflective of the actual revenue requirements, Sunflower has voluntarily taken the initiative of adjusting the revenue requirements under the formula-based rate to capture an immediate and quantifiable benefit to ratepayers.

5. Sunflower Electric Power Corporation's Motion to Approve Adjustments is hereby approved in its entirety.

IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:

A. The Commission grants Sunflower Electric Power Corporation's Motion to Approve Adjustments in its entirety for the reasons stated above.

B. This Order shall be electronically serviced on all parties of record. Parties have 15 days from the date of electronic service of this Order in which to petition the Commission for reconsideration. K.S.A. 66-118b; K.S.A. 77-529(a)(1).

C. The Commission retains jurisdiction over the subject matter and parties for the purpose of entering such further order or orders as it may deem necessary.

BY THE COMMISSION IT IS SO ORDERED.

Albrecht, Chair; Emler, Commissioner; Apple, Commissioner

Dated: _____

Thomas A. Day
Acting Executive Director