

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chair  
Jay Scott Emler  
Dwight D. Keen

In the Matter of the Application of Southern )  
Pioneer Electric Company Seeking Waiver )  
of Minimum Standards for Payment )  
Methods for Utility Bills and Allowing the ) Docket No. 18-SPEE-241-TAR  
Acceptance of Credit Cards and the )  
Approval of Revisions to Their Schedule of )  
Fees Related to the Assessment of Credit )  
Card Convenience Fees. )

**JOINT MOTION FOR EXTENSION OF TIME**

Southern Pioneer Electric Company (Southern Pioneer), Staff of the State Corporation Commission (Staff and Commission, respectively), and Citizens' Utility Ratepayer Board (CURB) (collectively referred to as Joint Movants) hereby move the Commission for an Extension of Time in the above-captioned docket. In support of its motion, Joint Movants state the following:

1. On December 8, 2017, Southern Pioneer filed an Application with the Commission requesting approval of (1) a waiver of certain minimum standards for payment methods for utility bills and allowing the acceptance of credit cards; and (2) approval to make certain revisions to Southern Pioneer's Schedule of Fees related to the assessment of credit card convenience fees as contained in the Commission-approved Southern Pioneer Rules and Regulations for the geographic service territory served by Southern Pioneer, and for other related relief that may be required.

2. On December 21, 2017, Staff filed a Suspension Order suspending this matter 240 days from the date Southern Pioneer's Application was filed, until August 6, 2018.

3. On December 21, 2017, the Commission issued an Order Granting the CURB's Petition to Intervene, along with a Protective Order and Discovery Order.

4. On July 3, 2018, Staff filed its Report and Recommendation (R&R). In that R&R, Staff recommended Southern Pioneer be allowed to eliminate its credit card convenience fee and revise its Schedule of Fees. Additionally, Staff did not recommend Southern Pioneer be allowed to exclude any customer class from bill payment via credit card, as Staff believes limiting eligibility to only residential customers would be unreasonable discriminatory. Lastly, Staff recommended Southern Pioneer be allowed to incorporate the cost of processing credit card transactions into its cost of service and request that those costs be recovered through base rates from all customers in its next general rate case via regulatory asset.

5. On July 13, 2018, CURB filed its response to Staff's R&R. In its Response, CURB determined that Staff's recommendations are reasonable and in the best interests of Southern Pioneer's residential and small commercial ratepayers. Additionally, CURB supported Southern Pioneer's request for a waiver of certain minimum standards for payment methods, and Southern Pioneer's request to make revisions to its Schedules of Fees.

6. On July 16, 2018, Southern Pioneer filed its response to Staff's R&R. In its Response, Southern Pioneer supported Staff's recommendation that it be allowed to eliminate its credit card convenience fee and revise its Schedule of Fees. However, Southern Pioneer did not agree with Staff's recommendation that limiting the no-fee program to only residential customers is unreasonably discriminatory. Additionally, Southern Pioneer believes that Staff's recommendation of a regulatory asset would not provide cost recovery in a timely manner.

7. On July 25, 2018, Staff filed a Reply to Southern Pioneer's Response and CURB's Recommendations. In that Reply, Staff maintained that allowing Southern Pioneer to limit the

availability of bill payment via credit card to residential customers would be unreasonable discriminatory based on the data presented in this case. Additionally, Staff stated that its recommendation of a regulatory assets is the most appropriate method of dealing with regulatory lag in this case.

8. Due to the time constraints imposed by Staff's Suspension Order, and the parties' divergence on key issues in this case, Joint Movants believe an extension of time in this docket is necessary to allow sufficient time to review, consider, and analyze Southern Pioneer's requested tariff modifications. As such, Joint Movants request a 30-day extension from the date set forth in the Suspension Order, August 6, 2018, until Wednesday, September 5, 2018.

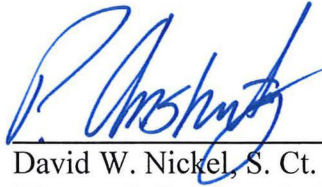
WHEREFORE, Joint Movants respectfully request the Commission grant this motion and issue an order approving the extension of time as set forth above.

*FOR*   
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## **CERTIFICATE OF SERVICE**

18-SPEE-241-TAR

I, the undersigned, certify that a true and correct copy of the above and foregoing Joint Motion for Extension of Time was served via electronic service this 2nd day of August, 2018, to the following:

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