

**BEFORE THE KANSAS CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Joint Application of )  
Sunflower Electric Power Corporation, )  
and Wheatland Electric Cooperative, Inc., for Approval )  
of a Local Access Charge and a 34.5kV Formula- ) Docket No. 25-SEPE-309-TAR  
Based Rate. )

**JOINT MOTION OF WHEATLAND ELECTRIC COOPERATIVE, INC., AND THE  
STAFF OF THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS  
FOR WAIVER OF FILING REQUIREMENTS**

COME NOW Wheatland Electric Cooperative, Inc. (“Wheatland”), and the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively), (collectively referred to as “Joint Movants”) and hereby move the Commission for an Order waiving certain filing requirements contained in K.A.R. 82-1-231, with respect to Sunflower Electric Power Corporation (“Sunflower”) and Wheatland’s Joint Application seeking approval of proposed change of the local access delivery service (“LADS”) tariff and implementation of a 34.5kV Formula Base Rate (“FBR”). In support of its motion, Joint Movants state the following:

1. Wheatland is a member-owned, not-for-profit electric distribution cooperative organized under the Electric Cooperative Act that provides retail electric service to over 21,400 members in nine Western Kansas Counties, six Central Kansas Counties, and three Eastern Colorado Counties. It is a certificated electric public utility, as defined in K.S.A. 66-104. In addition to retail service, Wheatland also provides certain wholesale services over its LADS System to customers under its current LADS tariff,

which was approved in Docket No. 16-WHLE-305-RTS (“16-305 docket”). Wheatland requests waiver of certain Application filing requirements in K.A.R. 82-1-231.

2. Historically, it has been recognized that while certain electric cooperative utilities are subject to the filing requirements of K.A.R. 82-1-231, certain requirements contained in the regulation are more applicable to investor-owned utilities, and as such Joint Movants developed and present to the Commission for approval, a modified filing requirements schedule, attached hereto as **Attachment A** and incorporated herein by reference.

3. Joint Movants represent that the modified filing requirements are sufficient to allow a thorough review of the 34.5kV FBR for Wheatland’s LADS System, and as such request, the Commission approves the use of **Attachment A**, whereby waiving the filing requirements of K.A.R. 82-1-231 for the purposes of Wheatland’s LAC Application in this docket.

WHEREFORE, Joint Movants respectfully request the Commission grant this motion waiving the filing requirements of K.A.R. 82-1-231 and approving the use of the modified filing requirements attached hereto.

Respectfully submitted,

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**ATTORNEY FOR COMMISSION  
STAFF**

**Attachment A**  
**Wheatland's LAC Cost of Service Filing Requirements**

1. A summary describing the revenue adjustment requested and the proposed changes in rates.
2. The complete CFC Form 7 for Historical Test Year used, and three previous calendar years.
3. LAC COS Exhibit detailing calculations.
4. Trial Balance, by primary account, for the period ending with normalized test year and three previous calendar years.
5. Payroll/Labor Distribution History, (without employee names) totals by GL account for test year and three previous calendar years.
6. Records for the 34.5 Transmission Plant in Service for the test year and three previous calendar years.
7. Operating Statements and Balance Sheets by primary account for the test year and three previous calendar years.
8. Tariff Sheets (Clean and Red-Lined Version).
9. Audited financial statements for the test year and/or most recent calendar year.
10. A complete detailed accounting, by account, of all dues, donations, charitable contributions, promotional advertising, penalties and fines, and entertainment expenses incurred during the Test Year.
11. Allocation ratios. This section shall contain complete details for all ratios used in the allocations between jurisdictions, areas of operations, classes of customers, and other allocable items. In addition, this section shall contain a narrative description of the rationale for the allocation ratio, the components included in the calculation of the ratio and their source, the allocation percentages applicable to jurisdictions or departments, and what is being allocated by the ratio.
12. Detailed information on all outstanding indebtedness, interest rates, loan covenants, and the method of assigning/allocating debt to different divisions and/or non-regulated operations.
13. Pre-filed Direct Testimony in Support of Exhibits.
14. Formulas in Native Excel Format

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 10th day of February, 2025, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing *Joint Motion* with an electronic copy e-mailed to:

*/s/ Amanda Wray*

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## Joint Motion – Waiver of Filing Requirements

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