

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

In the Matter of the Joint Application of)
Sunflower Electric Power Corporation and)
Mid-Kansas Electric Company, LLC for an) Docket No. 19-SEPE-054-MER
Order Approving the Merger of Mid-Kansas)
Electric Company, Inc. into Sunflower)
Electric Power Corporation.)

PETITION OF THE KANSAS POWER POOL TO INTERVENE

COMES NOW the Kansas Power Pool (KPP), a Municipal Energy Agency, and moves the Corporation Commission of the State of Kansas (Commission) for an order pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 permitting it to intervene in the above-captioned proceeding. In support of its Petition, KPP alleges and states as follows:

1. KPP is a municipal energy agency formed under K.S.A. 12-885, *et seq.*
2. KPP provides wholesale capacity, energy and transmission services to its members, who have all signed KPP's Amended Operating Agreement. Currently, KPP serves 24 Kansas municipal electric utilities. Sixteen of KPP's members are in the Westar Energy transmission zone, seven are in the Mid-Kansas Electric Company, LLC (MKEC) zone, and one is in the Midwest Energy zone. The seven KPP members who are in the MKEC zone include Greensburg, Attica, Kingman, Holyrood, Lucas, Luray and Glasco, Kansas (MKEC members).
3. On August 3, 2018, MKEC and Sunflower Electric Power Corporation (collectively, Applicants) submitted their joint application for approval of the merger of MKEC into Sunflower Electric Power Corporation.
4. A significant amount of KPP's power supply is dependent upon MKEC's transmission system for delivery to its members.

5. KPP and, ultimately, its members will or may be bound by any Commission Order or activity in this proceeding, and KPP and its members may be adversely affected thereby.

6. KPP's interests herein are not adequately represented by any other party.

7. All communication and correspondence to KPP, including service of all Notices and Orders of this Commission herein, are requested to be sent to the following named individuals:

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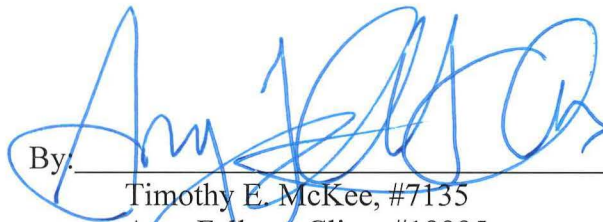
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WHEREUPON, KPP prays that the Commission enter an order allowing it to intervene herein and for all other relief which the Commission deems just and proper.

By: 

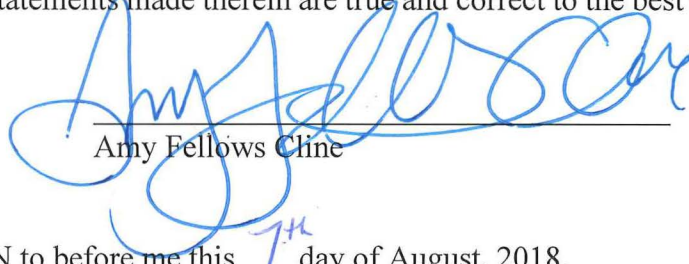
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VERIFICATION

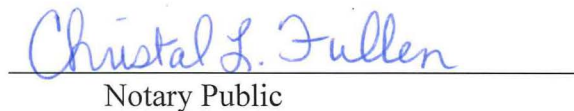
STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Amy Fellows Cline, of lawful age, being first duly sworn upon my oath, state that I am one of the attorneys for the Kansas Power Pool; that I have read the above Petition; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.



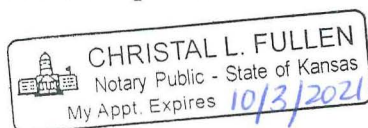
Amy Fellows Cline

SUBSCRIBED AND SWORN to before me this 7th day of August, 2018.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August, 2018, the Petition of the Kansas Power Pool to Intervene was served via electronic mail to:

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/s/ Amy Fellows Cline
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