

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Westar Energy,)
Inc. and Kansas Gas and Electric Company for) Docket No. 15-WSEE-181-TAR
Approval of Energy Efficiency Programs)

PETITION FOR INTERVENTION

Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy ("Black Hills"), states as follows:

1. Black Hills is a natural gas public utility operating in the state of Kansas pursuant to certificates of convenience and necessity issued by the Kansas Corporation Commission ("Commission"). Its principal place of business in the state of Kansas is located at 601 N. Iowa Street, Lawrence, Kansas 66044.

2. Black Hills competes with Westar Energy, Inc. ("Westar") in several locations in Kansas, including in the Lawrence and Wichita, Kansas areas.

3. In this docket, Westar proposes several energy efficiency programs – a Small Business Lighting ("SBL") program, a Home Energy Analysis ("HEA") program and a Targeted Energy Efficiency Program ("Targeted EE") program. To the extent these programs encourage a customer to switch from a natural gas burning appliance to a device fueled by electricity, such could have a negative impact on Black Hills and its customers.

4. Black Hills wishes to intervene in order to monitor this case and has an interest in knowing the impact of the programs on customers who may switch fuel uses from natural gas to electricity. Black Hills also has an interest in how the Commission sets energy efficiency policy on a case-by-case basis to permit cost recovery and incentive payments as well as the methodologies that may be adopted for the approval of energy efficiency programs. Accordingly, Black Hills has a

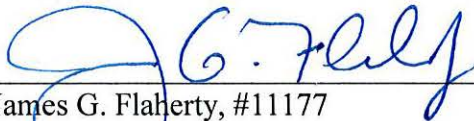
substantial interest in these proceedings.

5. Black Hills' legal rights, duties, privileges, immunities or other legal interests will be subsequently affected by this proceeding. Its revenues could be affected by the fuel switching aspects of the program. The incentive could provide Westar a competitive advantage over Black Hills.

6. No party other than Black Hills can adequately and efficiently represent its interests in this proceeding.

7. Granting intervention to Black Hills in this docket is in the interest of justice and will not impair the orderly and prompt conduct of the proceedings in this matter. Black Hills agrees to accept the schedule as currently set in this matter.

WHEREFORE, Black Hills respectfully requests that it be granted intervention in this docket, and that as an intervenor, Black Hills be granted full rights of participation in this docket.


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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF FRANKLIN)

James G. Flaherty, of lawful age, being first duly sworn on oath, states:

That he is an attorney for Black Hills/Kansas Gas Utility Company LLC, d/b/a Black Hills Energy, and is duly authorized to make this affidavit; that he has read the foregoing Petition for Intervention, knows the contents thereof; and that the facts set forth therein are true and correct.



James G. Flaherty

SUBSCRIBED AND SWORN to before me this 2nd day of March, 2015.





Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent by electronic mail this 2nd day of March 2015, addressed to:

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