

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

In the Matter of the Complaint of Southern Pioneer)
Electric Company Against the Kansas Power Pool)
Regarding Duplication of Service for 34.5kV) Docket No. 17-KPPE-092-COM
Delivery to the City of Kingman.)

PETITION TO INTERVENE

COMES NOW, Mid-Kansas Electric Company, LLC (“Mid-Kansas”), and moves the Commission to issue an Order allowing Mid-Kansas to intervene in this proceeding. In support of its petition, Mid-Kansas states:

1. Southern Pioneer Electric Company (“Southern Pioneer”) has filed a complaint against Kansas Power Pool (“KPP”) for attempting to bypass Southern Pioneer’s 34.5 kV sub-transmission system and connect directly to the Ninnescah Transmission Line owned by Mid-Kansas at a new delivery point for the primary purpose of avoiding payment of the Southern Pioneer Local Access Charge (“LAC”) for local access delivery service to the City of Kingman load over Southern Pioneer’s 34.5 kV sub-transmission system. In order to do so, KPP must construct a new 34.5 kV line from the existing City of Kingman 34.5 kV line at a point east of and near the Cunningham Substation, to a newly constructed 115/34.5 kV substation and associated interconnection facilities in order to connect its new 34.5 kV line to the Ninnescah Transmission Line. The proposed construction of new 115/34.5 kV substation and interconnection facilities would be located directly adjacent to Southern Pioneer’s existing Southern Pioneer SemCrude 115/34.5 kV Substation. The high-side of the new substation and interconnection facilities would be owned and operated by Mid-Kansas, and the low side of the substation and related facilities would be owned and operated by KPP or the City of Kingman. These newly proposed KPP facilities would be in lieu of KPP taking full import transmission

service from Southern Pioneer through upgrades to Southern Pioneer's existing SemCrude 115/34.5 kV Substation, which also interconnects to the Ninnescah Transmission Line.

2. Southern Pioneer contends that K.S.A. 66-101b requires that public utilities only furnish reasonably efficient and sufficient service and facilities for the services rendered. K.S.A. 66-101g provides that "...all grants of power, authority and jurisdiction herein made to the commission, shall be liberally construed, and all incidental powers necessary to carry into effect the provisions of this act are expressly granted to and conferred upon the [C]ommission." Southern Pioneer further contends that the facilities proposed by KPP are duplicative electric facilities and are not "reasonably efficient" facilities, and the Commission has the liberal statutory power to prevent such electric facilities from being constructed.

3. Wholesale Local Access Delivery Service across Southern Pioneer's sub-transmission facilities is administered by Mid-Kansas pursuant to the terms and conditions of the Mid-Kansas Open Access Transmission Tariff ("OATT"), initially approved by the Commission on October 31, 2014 in Docket No. 12-MKEE-650-TAR.

4. Because Mid-Kansas administers the Local Access Delivery Services for Southern Pioneer and the complaint is related to and may affect such service, Commission staff has requested that Mid-Kansas voluntarily petition to intervene in this docket to facilitate the resolution of the matter at issue.

5. Additionally, because Mid-Kansas' legal rights, duties, privileges, immunities or other legal interests may be substantially affected by this proceeding, and the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. For the above reasons, Mid-Kansas requests that the Commission grant its request and allow Mid-Kansas to fully participate in this matter.

6. All communications and correspondence to Mid-Kansas, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

Corey Linville
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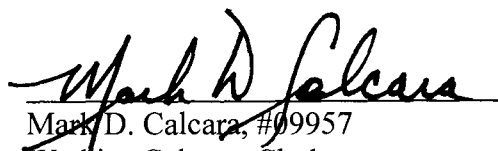
Al Tamimi
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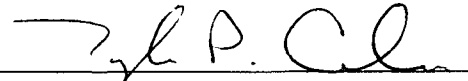
Renee Braun
Corporate Paralegal and
Contracts Supervisor
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WHEREFORE, Mid-Kansas requests that the Commission issue its Order granting Mid-Kansas' Petition to Intervene in this matter and for such other and further relief as may be appropriate.

Respectfully submitted,



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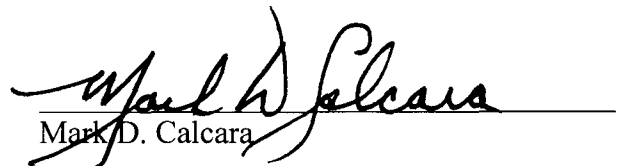
**Attorneys for Mid-Kansas Electric
Company, LLC**

VERIFICATION

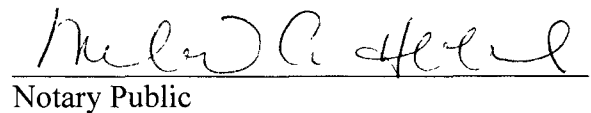
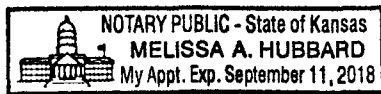
STATE OF KANSAS)
) ss:
COUNTY OF BARTON)

Mark D. Calcara, of lawful age, being first duly sworn on oath, states:

That he is an attorney for Mid-Kansas Electric Company, LLC; that he has read the above and foregoing Petition to Intervene and knows the contents thereof; and that the statements contained therein are true.


Mark D. Calcara

SUBSCRIBED AND SWORN to before me this 10th day of March, 2017.


Notary Public

My Commission Expires: 9-11-2018

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 10th day of March, 2017, the above and foregoing *Petition to Intervene* was served by electronic service to the following parties:

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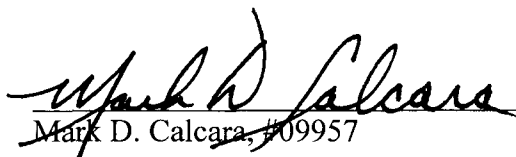
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