

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

In the Matter of the Application of Evergy Kansas]	
Metro, Inc., Evergy Kansas South, Inc., and]	
Evergy Kansas Central, Inc., for the Approval of]	Docket No. 25-EKME-315-TAR
Large Load Power Service Rate Plan and]	
Associated tariffs.]	

PETITION

COMES NOW, Unified School District #259 Sedgwick County, Kansas (hereinafter “USD 259”) and respectfully petitions the Corporation Commission of the State of Kansas (the “Commission”) for an order permitting its intervention and full participation in the captioned proceeding. In support of its Petition, USD 259 states:

I. Background

1. On February 11, 2025, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (collectively referred to as “Evergy Kansas Central” or “EKC”) and Evergy Kansas Metro, Inc. (“Evergy Kansas Metro” or “EKM”) (collectively referred to as “Evergy” or “Joint Applicants”) filed an Application entitled: “APPLICATION OF EVERGY KANSAS METRO, INC., EVERGY KANSAS SOUTH, INC., AND EVERGY CENTRAL, INC. FOR APPROVAL OF LARGE LOAD SERVICE RATE PLAN AND ASSOCIATED TARIFFS” (hereinafter the “Application.”).

2. The Application requests a significant increase in retail electric rates “for customers over 100 MW seeking to interconnect Evergy’s Kansas systems.” This docket will involve both new tariff offerings and consideration of cost assignment for LLPS Rate Plan customers. Therefore, this Docket will directly affect the retail electric rates of all retail ratepayers currently on EKC and EKM.

3. Tariff changes affecting LLPS Rate Plan customers in both EKC and EKM territories necessarily have an effect, if not now, then in the future, on rate adjustments and tariff changes affecting schools in EKC territory. As stated Evergy's Motion, it is a "vertically integrated electric public utility" company, which gives it great control over all stages of its supply and distribution. This necessarily means that Evergy should be able to reduce costs across various stages of its production and distribution process, including across both EKM and EKC territories and customers; thus changes in one territory and customer class will necessarily affect the other.

II. Petition to Intervene

4. USD 259 comprises the Wichita Public School system and is the largest public school system in the state of Kansas, serving approximately 50,000 students. USD 259 is part of the public schools' rate class and is the largest school district in the state of Kansas.

5. USD 259 is a significant user of electricity supplied principally by Evergy Kansas Central (hereinafter "Evergy") having consumed approximately 75,082,187KWh of electricity supplied at a cost of \$8,552,098.00 for the "test year" ending September 30, 2022.

6. USD 259 consumed approximately 74,669,823KWh of electricity supplied at a cost of \$7,860,428.00 for the billing period of July 2021 to June 2022.

7. USD 259 consumed approximately 73,469,558KWh of electricity supplied at a cost of \$8,933,662.00 for the billing period of July 2022 to June 2023.

8. USD 259 consumed approximately 78,260,430KWh of electricity supplied at a cost of \$ 8,520,840.00 for the billing period of July 2023 to June 2024.

9. USD 259 is dependent primarily upon tax revenues to finance its mandated purpose of providing a quality education for Kansas students. The subject of the captioned docket could significantly impact how USD 259 deals with financing and structuring its budget in response to

any order coming out of this docket. Thus, USD 259 has a substantial and vital interest in the outcome of this proceeding, which cannot be adequately represented by any other party.

10. USD 259 requests the right to fully participate in all aspects of this Docket. The interests of justice will be served and the orderly and prompt conduct of these proceedings will not be impaired by allowing the intervention of USD 259 to participate therein.

III. Requirement for Intervention

11. K.A.R. 82-1-225 provides in pertinent part:

- (a) The presiding officer shall grant a petition for intervention in the following conditions are met:
 - (1) The Petition is submitted in writing to the presiding officer, with copies mailed to all parties named in the presiding officer's notice of the hearing, at least three days before the hearing.
 - (2) The petition states facts demonstrating that the petitioner's legal rights, duties, privileges, immunities, or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law.
 - (3) The presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention,
- (b) The presiding officer may grant a petition for intervention at any time upon determining that the intervention sought is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

9. The KCC, in applying K.A.R. 82-1-225, has previously stated:

The Commission shall grant Intervention if the Petition:

- (1) Is submitted in writing to the presiding officer, with service on all parties named in the Commission's notice of hearing, at least 3 business days before the hearing; (2) states facts demonstrating the petitioner's legal rights, duties, privileges, immunities, or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and (3) the interest of Justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. The Commission has discretion to grant intervention at any time where intervention is the interest of justice and will not impair the orderly and prompt conduct of proceedings. At any time during a proceeding, the Commission may impose limitations on the intervenor's participation, which may include: (1) limiting an intervenor's participation to designated issues in which the intervenor has a particular

interest demonstrated by the petition; (2) limiting the intervenor's discovery, cross-examination, and other procedures; and (3) requiring intervenors to consolidate their participation in the Proceedings." ORDER GRANTING INTERVENTIONS, KCC Docket No. 22/EKME/254/TAR, March 31, 2022, at para. 8.

12. In addition to the undersigned counsel, please include the following USD 259 representatives and consultants with all electronic notices, pleadings, and correspondence regarding this Application:

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WHEREFORE, USD 259 respectfully requests that the Commission enter an order granting it full participation in the captioned proceedings.

Respectfully submitted,

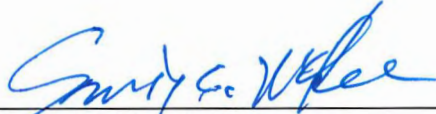
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VERIFICATION

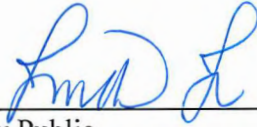
STATE OF KANSAS)
) ss:
 COUNTY OF SEDGWICK)

I, Timothy E. McKee, of lawful age, being first duly sworn, upon oath states: I am an attorney representing USD 259, and I have read the above Petition to Intervene and know the contents and know that the statements made therein are true and correct, to the best of my knowledge and belief.



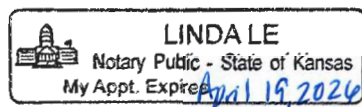
 Timothy E. McKee, #07135

SUBSCRIBED AND SWORN to before me on this 19th day of February 2025.



 Notary Public

My Commission Expires:



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 19th day of February, 2025, to the following:

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