

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of)
Mid-Kansas Electric Company, LLC, Prairie)
Land Electric Cooperative, Inc., Southern)
Pioneer Electric Company, The Victory Electric) Docket No. 16-MKEE-023-TAR
Cooperative Association, Inc., and Western)
Cooperative Electric Association, Inc., for)
Approval of Individual 34.5kV Formula-Based)
Rates)

PETITION OF KANSAS ELECTRIC POWER
COOPERATIVE, INC. TO INTERVENE

Comes now Kansas Electric Power Cooperative, Inc. (KEPCo) 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, KEPCo alleges and states as follows:

1. KEPCo is a corporation duly organized under the laws of the State of Kansas, with its principal place of business at 600 SW Corporate View, Topeka, Kansas 66615. It is authorized to do business and is conducting business in the State of Kansas.
2. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 19 member distribution cooperatives in the State of Kansas, serving approximately 300,000 consumer members.
3. On July 16, 2015, Mid-Kansas Electric Company, LLC (Mid-Kansas) and its four members submitted their application for approval of separate formula-based rates for their 34.5kV Local Access Delivery Service.

4. The delivery costs of KEPCo to its members is affected by the rates for 34.5kV Local Access Delivery Service charged by the four member-owners of Mid-Kansas. Therefore, KEPCo and, ultimately, its members will or may be bound by any Commission order or activity in this proceeding, and KEPCo and its members may be adversely affected thereby.

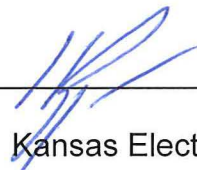
5. KEPCo's interest herein is not adequately represented by any other party.

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

William Riggins (# 12080)
Senior Vice President and General Counsel
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
785-271-4833
785-271-4888 fax
briggins@kepco.org

Mark Doljac
Director of Rates and Regulation
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
785-271-4842
785-271-4888 (fax)
mdoljac@kepco.org (email)

WHEREFORE, KEPCo prays that the Commission enter an Order allowing it to intervene herein and for all other relief which the Commission deems just and proper.




William Riggins (# 12080)
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
785-271-4833
785-271-4888 fax
briggins@kepco.org

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

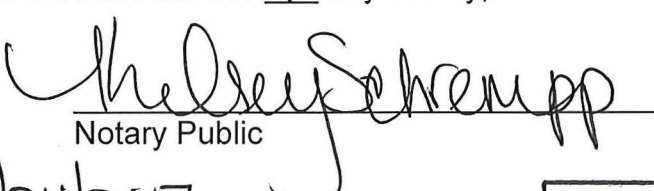
William Riggins, of lawful age, being first duly sworn upon his oath states:

That he is an attorney for the above named petitioner, that he has read the above and foregoing Petition to Intervene, and upon information and belief, states that the matters therein appearing are true and correct.



William Riggins

SUBSCRIBED AND SWORN to before me this 17th day of July, 2015.



Notary Public

My Commission expires 2/24/2017



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing was placed in the United States mail, postage prepaid, this 17 day of July, 2015, addressed to the following:

JAMES BRUNGARDT, REGULATORY AFFAIRS ADMINISTRATOR
MID-KANSAS ELECTRIC COMPANY, LLC
301 W 13TH ST
PO BOX 980
HAYS, KS 67601

ALLAN MILLER, CEO
PRAIRIE LAND ELECTRIC COOPERATIVE, INC.
14935 US HWY 36
PO BOX 360
NORTON, KS 67654-0360

STEPHEN J. EPPERSON, CHIEF EXECUTIVE OFFICER
SOUTHERN PIONEER ELECTRIC COMPANY
1850 W OKLAHOMA
PO BOX 430
ULYSSES, KS 67880-0430

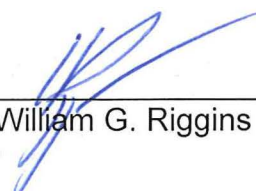
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ULYSSES, KS 67880-0430

SHANE LAWS, CEO
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3230 N 14TH ST
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DODGE CITY, KS 67801-1335

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GREAT BEND, KS 67530

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DARRIN LYNCH, MANAGER
WESTERN COOPERATIVE ELECTRIC ASSN., INC.
635 S 13TH ST
PO BOX 278
WAKEENEY, KS 67672-0278



William G. Riggins