

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

BEFORE COMMISSIONERS: Dwight Keen, Chair
 Shari Feist Albrecht, Commissioner
 Jay Scott Emler, Commissioner

In The Matter of Westar Energy, Inc. and)
Kansas Gas and Electric Company seeking)
Commission Approval to Implement)
Changes in their Transmission Delivery)
Charges Rate Schedules.) Docket No. 19-WSEE-327-TAR

PETITION TO INTERVENE

COMES NOW, Southeast Kansas Education Service Center – Interlocal #609 (hereinafter “Local 609”) and respectfully moves 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, Local 609 states:

1. Local 609 is comprised of 47 Public School Districts in the State of Kansas (**Exhibit A**), serving approximately 139,048 students.
2. On February 15, 2019, Westar Energy, Inc. and Kansas Gas and Electric Company (hereinafter “Westar”) filed a report with the Commission to make certain changes in their Transmission Delivery Charge (hereafter “TDC”).
3. The vast majority of Local 609’s members takes all of their electric service from Westar, and the remaining members may well be impacted by the TDC charges proposed in this Docket.
4. Local 609’s members operate 1,538 number of buildings and approximately 1,560 number of electric meters.

5. Although it appears from Westar's filing that the total TDC, for which Westar requests approval of in this docket will decrease moderately the shift between rate classes is particularly dramatic.

6. Although the calculation of the TDC and its allocation to various rate classes is extremely complicated and, apparently, now involves the use of a 12 coincidental peak formula versus a 4-coincidental peak formula used in the past, the resulting increase in Westar's proposal TDC for public schools and universities of approximately is an 85% increase over the current charge.

7. An increase of 85% to public schools constitutes "rate shock" and flies in the face of the Commission's traditional approach to gradualism with respect to introduction of new significantly increased rates for electric service.

8. Public schools are classified as their own rate class. The members of Local 609 are part of the public school rate class. Only USD 259, which takes electric service from Westar under the public school rate class has sought to intervene in this case to date. Local 609's members are public schools in small and rural communities, and the impact of the proposed TDC changes on the small rural schools may well differ than the impact on USD 259.

9. It is the duty of the public schools to prepare future workforce of Kansas through quality education services. Students of today are critical to the future economic vitality of the State of Kansas. Any electric rate changes of the nature proposed in the current docket will have a significant impact on the funding for public schools and thus impact the quality of educational services. Local 609 requests permission to intervene in this Docket and participate fully.

10. Local 609 requests the right to conduct discovery, present witnesses, cross-examine witnesses, and 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 Local 609 to fully participate therein.


11. In addition to the undersigned counsel, please include the following Local 609 representatives with all electronic notices, pleadings, and correspondence regarding this Application:

John Staton
Deputy Executive Director and Chief Financial Officer
947 West 47 Highway
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WHEREFORE, Local 609 respectfully requests that the Commission enter an order granting it full participation in the captioned proceedings.

Respectfully submitted,

TRIPLETT WOOLF GARRETSON, LLC

By 

Timothy E. McKee, #07135
Amy Fellows Cline, #19995
*Attorneys for Southeast Kansas Education
Service Center – Interlocal #609*

VERIFICATION

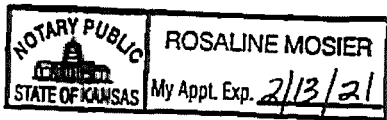
STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

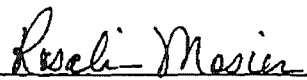
John L. Staton of lawful age, being first duly sworn, upon oath states: He is the Deputy Executive Director and Chief Financial Officer for Local 609, and that he has read the above Petition to Intervene knows the contents and knows that the statements made therein are true and correct, to the best of his knowledge and belief.



JOHN L. STATON

*SUBSCRIBED AND SWORN to before me this 8 day of March, 2019.





Notary Public

My Commission Expires:

February 13, 2021

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 12th day of March, 2019, to the following:

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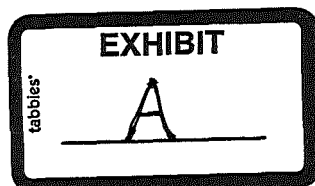
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Timothy E. McKee, #7135

Greenbush Energy Participation

Greenbush Energy Schools - 2018-2019		
2	CUSD 101 Erie	USD 366 Woodson School District
2	USD 111 Doniphan West	USD 372 Silver Lake
2	USD 203 Piper	USD 375 Circle
2	USD 230 Spring Hill	USD 377 Atchison County Community Schools
2	USD 232 DeSoto	USD 380 Vermillion
2	USD 233 Olathe	USD 386 Madison
2	USD 234 Fort Scott	USD 389 Eureka
2	USD 244 Burlington	USD 394 Rose Hill
2	USD 246 Arma	USD 395 LaCrosse
2	USD 247 Cherokee	USD 402 Augusta
2	USD 248 Girard	USD 410 Durham-Hillsboro-Lehigh
2	USD 249 Frontenac	USD 435 Abilene
2	USD 250 Pittsburg	USD 445 Coffeyville
2	USD 252 Southern Lyon County	USD 446 Independence
2	USD 256 Marmaton Valley	USD 457 Garden City
2	USD 259 Wichita	USD 458 Basehor-Linwood
2	USD 262 Valley Center	USD 470 Arkansas City
2	USD 287 West Franklin	USD 491 Eudora
2	USD 289 Wellsville	USD 498 Valley Heights
2	USD 331 Kingman-Norwich	USD 503 Parsons
2	USD 340 Jefferson West	USD 506 Altamont
2	USD 344 Pleasanton	St Mary's/Colgan
2	USD 353 Wellington	Labette Community College
1	USD 364 Marysville	
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3/8/2019