

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of Sunflower)
Electric Power Corporation and Wheatland Electric) Docket No. 25-SEPE-309-TAR
Cooperative, Inc., for Approval of a Local Access)
Charge and a 34.5kV Formula-Based Rate.)

**PETITION OF KANSAS ELECTRIC POWER
COOPERATIVE, INC. TO INTERVENE**

COMES NOW Kansas Electric Power Cooperative, Inc. (“KEPCo”) and, pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, respectfully petitions the State Corporation Commission of the State of Kansas (“Commission”) for an order permitting it to intervene in the above-captioned docket. In support of its petition, KEPCo states as follows:

1. KEPCo is a corporation duly organized and existing under the laws of the state of Kansas, with its registered office and principal place of business at 600 SW Corporate View, Topeka, Kansas, 66615.

2. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 16 member distribution cooperatives (“Members”) in the state of Kansas pursuant to all-requirements wholesale electric power agreements. KEPCo’s Members serve approximately 75,000 retail meters in the eastern two-thirds of Kansas, which equates to nearly 200,000 rural Kansans.

3. On February 5, 2025, Sunflower Electric Power Corporation (“Sunflower”) and Wheatland Electric Cooperative, Inc. (“Wheatland”) (collectively, “Joint Applicants”) jointly filed an application seeking an increase in Wheatland’s local access charge (“LAC”) rate that is set forth in its local access delivery service (“LADS”) tariff for its Eastern Division, and the establishment of a Formula-Based Rate (“FBR”) for Wheatland’s 34.5 kV and lower wholesale

sub-transmission facilities for its Eastern Division.¹ Wheatland is requesting an LAC rate change from \$1.99 to \$2.95, and for an FBR for future Annual Filings starting in 2026.

4. KEPCo takes service under Wheatland's LADS tariff and any change to its LAC rate and the establishment of a 34.5 kV FBR will impact KEPCo. Therefore, KEPCo seeks to intervene in the docket in order to review the filing and determine the impact of using Wheatland's 34.5 kV system based on the changes proposed by the Joint Applicants in order to protect its interests.

5. In addition, should the Commission approve the changes proposed by the Joint Applicants, KEPCo will be bound by such Commission order and may be adversely affected thereby.

6. Further, KEPCo's interest herein may not be adequately represented by any other party to the proceeding.

7. Thus, KEPCo submits its petition to intervene should be granted without limitation.

8. In addition to the undersigned counsel, service of all pleadings, testimony, briefs, orders, correspondence, and other communication relating to this docket should be sent to the following named individual:

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¹ Joint Application at p. 1.

WHEREFORE, for the above and foregoing reasons, KEPCo respectfully requests that the Commission grant its petition to intervene and for such other relief as the Commission deems just and proper.

Respectfully submitted,

/s/ Susan B. Cunningham

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VERIFICATION
(K.S.A. 53-601)

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

I, Susan B. Cunningham, verify under penalty of perjury that I have caused the foregoing Petition of Kansas Electric Power Cooperative, Inc. to Intervene to be prepared on behalf of Kansas Electric Power Cooperative, Inc.; that I have read and reviewed the Petition; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

/s/ Susan B. Cunningham

Susan B. Cunningham

Executed on this 14th day of February, 2025.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Petition of Kansas Electric Power Cooperative, Inc. to Intervene was electronically served on this 14th day of February, 2025, to the following named persons appearing on the Commission’s service list as last modified on February 13, 2025:

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/s/ Susan B. Cunningham

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