

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of Sunflower)
Electric Power Corporation and Prairie Land)
Electric Cooperative, Inc. for Approval of) Docket No. 26-SEPE-049-TAR
Continuation of 34.5kV Formula-Based Rates.)
)

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 17 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 August 11, 2025, Sunflower Electric Power Corporation (“Sunflower”) and Prairie Land Electric Cooperative, Inc. (“Prairie Land”) (collectively, “Joint Applicants”) jointly filed an application seeking approval for “[c]ontinuation of Prairie Land’s respective individual 34.5kV Formula-Based Rates (“34.5kV FBR(s)”), as originally approved in Docket No. 16-MKEE-023-TAR (“023 Docket”) and approved for renewal in Docket No. 21-SEPE-049-TAR (“21-049 Docket”), without any substantive changes.” Joint Application at p. 1.

4. KEPCo takes service from Prairie Land's 34.5kV facilities pursuant to its Local Access Distribution Service ("LADS") tariff. Any change to the 34.5kV FBR, whether or not substantive, will necessarily impact KEPCo. KEPCo seeks to intervene in the docket in order to review the filing and determine the impact of Prairie Land's continued use of its FBR mechanism and other changes proposed by the Joint Applicants on KEPCo in order to protect its interests.

5. For these reasons, KEPCo has a direct and substantial interest in the issues to be addressed in this docket and such interest cannot be adequately represented by any other party. Further, KEPCo may or will be substantially affected by any Commission order or activity in this proceeding. K.A.R. 82-1-225(a)(2). Finally, the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing KEPCo to intervene. K.A.R. 82-1-225(a)(3).

6. Because KEPCo will or may be bound by any Commission order or activity in this proceeding and may be adversely affected thereby, and because KEPCo's interest herein may not be adequately represented by any other party, KEPCo respectfully requests its petition to intervene be granted without limitation.

7. 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:

Rebecca Fowler
Director, Regulatory Affairs
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
Telephone: (785) 271-4843
E-mail: rfowler@kepc.org

WHEREFORE, for the above and foregoing reasons, KEPCo respectfully requests that the Commission grant its Petition to Intervene without limitation and for such other relief as the Commission deems just and proper.

Respectfully submitted,

/s/ Susan B. Cunningham

Susan B. Cunningham, KS #14083
Senior Vice President & General Counsel
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
O: (785) 271-4815
M: (785) 817-1864
E-mail: scunningham@kepco.org

*Attorney for Kansas Electric Power
Cooperative, Inc.*

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 18th day of August 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 18th day of August 2025, to the following named persons appearing on the Commission's service list:

Ahsan Latif, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604
ahsan.latif@ks.gov

Madisen Hane, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604
madisen.hane@ks.gov

James Brungardt, Mgr., Reg. & Govt. Affairs
Sunflower Electric Power Corporation
301 W. 13th, P.O. Box 1020
Hays, KS 67601-1020
jbrungardt@sunflower.net

Monica Seib, Corp. Paralegal Supervisor
Sunflower Electric Power Corporation
301 W. 13th, P.O. Box 1020
Hays, KS 67601-1020
mseib@sunflower.net

Taylor P. Calcara
Watkins Calcara Chtd.
1321 Main St., Ste. 300
P.O. Drawer 1110
Great Bend, KS 67530
tcalcara@wcrf.com

Jack L. Roenne
Watkins Calcara Chtd.
1321 Main St., Ste. 300
P.O. Drawer 1110
Great Bend, KS 67530
jroenne@wcrf.com

Justin Craswell, Utility Rate Analyst
Power System Engineering, Inc.
1532 W. Broadway, Ste. 103
Madison, WI 53713
craswellj@powersystem.org

Richard J. Macke, Vice President
Power System Engineering, Inc.
1532 W. Broadway, Ste. 103
Madison, WI 53713
macker@powersystem.org

Kirk A. Girard, CEO
Prairie Land Electric Cooperative, Inc.
14935 US Hwy 36
P.O. Box 360
Norton, KS 67654-0360
kgirard@ple.coop

Elena Larson, Dir. of Member Svcs.
Prairie Land Electric Cooperative, Inc.
14935 US Hwy 36
P.O. Box 360
Norton, KS 67654-0360
elarson@ple.coop

Rebecca A. Fowler, Dir., Reg. Affairs
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
rfowler@kepco.org

/s/ Susan B. Cunningham

Susan B. Cunningham