

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: John Wine, Chair  
Susan M. Seltsam, Commissioner  
Cynthia L. Claus, Commissioner

DEC 08 1998

Docket  
Room

In the Matter of the Investigation )  
by the Commission of the adequacy ) Docket No. 99-GIME-321-GIG  
of future Kansas electric genera- )  
tion capacity. )

PETITION FOR INTERVENTION OF  
FARMLAND INDUSTRIES, INC.

COMES NOW Farmland Industries, Inc. ("Farmland"), and for its  
Petition for Intervention herein states as follows:

1. On November 5, 1998, the State Corporation Commission  
of the State of Kansas ("Commission" or "KCC") initiated the above-  
entitled KCC Docket by issuing its "ORDER DIRECTING INVESTIGATION"  
("ORDER").

2. In its ORDER, by way of "BACKGROUND," the Commission  
noted that: "A number of recent events have demonstrated the need  
for the Commission to investigate the adequacy of Kansas electric  
generation capacity. . . .", and that: "Electric capacity shortages  
during the Summer of 1998 may indicate that Kansas electric  
utilities have not adequately planned generation capacity to meet  
future peak demands. . . .", and that: "The 1998 Southwest Power  
Pool ("SPP") EIA411 report projects that Kansas utilities will not  
have an adequate capacity margin by year 2002 to meet minimum  
reliability criteria. . . ."

3. The Commission found that: (a) the electric capacity  
shortages during the Summer of 1998, which resulted in

interruptions of electric service to many customers; and (b) the forecast of the SPP, which indicates worsening capacity margins in the coming years, substantiated the need for the KCC to investigate the adequacy of Kansas electric generation capacity for the coming years.

4. The KCC also found that it is necessary to obtain specific capacity and planning information from all electric utilities in Kansas in order to formulate effective policy for the future regulation of the utilities under KCC jurisdiction.

5. Farmland Industries, Inc. ("Farmland") is a Kansas cooperative association, with major electric consuming facilities in Kansas City, Lawrence, Coffeyville, Hutchinson, Dodge City, Wichita, and Liberal, Kansas, as well as in many other locations throughout the State of Kansas. Farmland purchases electric energy from the Board of Public Utilities of Kansas City, Kansas, the KPL Division of Western Resources, Inc., the Kansas Gas and Electric Company, the Kansas City Power & Light Company, the Victory Electric Cooperative Association, and several other suppliers of electric energy in the State of Kansas.

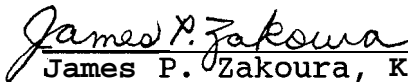
6. Farmland purchases electric energy in the State of Kansas under both firm and interruptible tariffs, contracts, and agreements.

7. Orders issued by the KCC in the above-entitled Docket will or may affect Farmland in many ways, including reliability of service and the price of electric energy. Orders of the KCC in the above-entitled Docket will or may directly affect the business

interests of Farmland in the State of Kansas. No other party to this proceeding can adequately represent the interests of Farmland in the area of its consumption of electric energy.

WHEREFORE-, Farmland Industries, Inc. respectfully requests that the KCC grant its Intervention herein, and grant to Farmland the full rights of participation as granted to any entity herein, including electric public utilities, the Staff of the KCC, and the Citizens Utility Ratepayers Board, including full and complete rights of discovery, full and complete rights to file testimony and to cross-examine witnesses, full and complete rights to submit pleadings and other documents for consideration by the Commission, and full and complete rights to brief issues for consideration by the KCC.

Respectfully submitted,

  
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and

*Edmund S. Gross JPZ*

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Edmund S. Gross, S. Ct. #10702

FARMLAND INDUSTRIES, INC.

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Attorneys for

FARMLAND INDUSTRIES, INC.

VERIFICATION

STATE OF KANSAS            )  
                                  ) ss.  
COUNTY OF JOHNSON    )

I, James P. Zakoura, being first duly sworn, state that the above and foregoing PETITION FOR INTERVENTION OF FARMLAND INDUSTRIES, INC., is true and accurate to the best of my knowledge, information and belief.

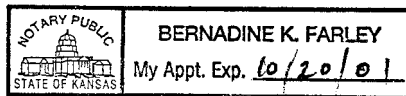
James P. Zakoura  
James P. Zakoura

Subscribed and sworn to before me this 8<sup>th</sup> day of December, 1998.

Bernadine K. Farley  
Notary Public

My Appointment Expires:

October 20, 2001



CERTIFICATE OF SERVICE

I hereby certify that copies of the Petition for Intervention of Farmland Industries, Inc., was served on the 8<sup>th</sup> day of December, 1998, by depositing in the United States mail, postage prepaid, addressed to the following:

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