

**BEFORE THE
STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Prairie Land)
Electric Cooperative, Inc. Seeking Commission)
Approval to Update Its Local Access Delivery) Docket No. 23-PLCE-789-TAR
Service Tariff Pursuant to the 34.5kV Formula)
Based Rate Plan Approved in Docket No. 21-)
SEPE-049-TAR

PETITION OF THE KANSAS POWER POOL TO INTERVENE

COMES NOW the Kansas Power Pool (“KPP”), a Municipal Energy Agency (hereinafter the “KPP”) 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, KPP alleges and states as follows:

1. KPP is a municipal energy agency formed under K.S.A. 12-885, *et seq.*
2. KPP provides wholesale capacity, energy and transmission services to its members, who have all signed KPP’s Amended Operating Agreement. Currently, KPP serves 24 Kansas municipal electric utilities. KPP’s members are located in the Westar Energy transmission zone, the Sunflower Electric Power Corporation zone, and in the Midwest Energy zone.
3. On April 27, 2023, Prairie Land Electric Cooperative, Inc. (“Prairie Land”) filed an application with the Commission for the purpose of updating its LADS tariff pursuant to the 34.5kV Formula Based Rate (“34.5kV FBR”) plan approved in Docket No. 21-SPEE-049-TAR.
4. Prairie Land owns and operates 34.5kV sub-transmission facilities that provide service to both retail customers and wholesale local access customers. The wholesale local access customers’ combined load ration share of the total 34.5kV system revenue requirement for these facilities is recovered through the Local Access Delivery Service (“LADS”) tariff.

5. KPP is one of Prairie Land's wholesale local access customers, and, thus, is required to pay the LADS rates under Prairie Land's 34.5 kV FBR Plan. Furthermore, Prairie Land serves the KPP member city, the City of Glasco, and any change to Prairie Land's LADS will impact KPP.

6. KPP and, ultimately, its members will or may be bound by any Commission Order or activity in this proceeding, and KPP and its members may be adversely affected thereby.

7. KPP's interests herein are not adequately represented by any other party, and its intervention will not impair the orderly and prompt conduct of the proceedings.

8. All communication and correspondence to KPP, including service of all Notices and Orders of this Commission herein, are requested to be sent to the following named individuals:

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WHEREFORE, KPP prays that the Commission enter an order allowing it to intervene and fully participate in this docket, including but not limited to the right to conduct discovery, file pleadings and testimony, present oral argument, and fully participate in any scheduled hearings, and for all other relief which the Commission deems just and proper.

Respectfully submitted,


TRIPLETT WOOLF GARRETSON, LLC

By: /s/ Kacey S. Mayes
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VERIFICATION

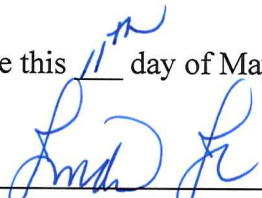
STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Kacey S. Mayes, of lawful age, being first duly sworn upon my oath, state that I am one of the attorneys for the Kansas Power Pool; that I have read the above Petition; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.



Kacey S. Mayes, 28224

SUBSCRIBED AND SWORN to before me this 11th day of May, 2023.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2023 the *Petition of the Kansas Power Pool to Intervene* was served via electronic mail to:

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