

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Application of Southern )  
Pioneer Electric Company for Approval to )  
Make Certain Changes in Its Charges for ) Docket No. 15-SPEE-161-RTS  
Electric Services )

PETITION OF KANSAS ELECTRIC POWER COOPERATIVE, INC. TO INTERVENE

Comes now Kansas Electric Power Cooperative, Inc. (KEPCo) 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, KEPCo alleges and states as follows:

1. KEPCo is a corporation duly organized under the laws of the State of Kansas, with its principal place of business at 600 SW Corporate View, Topeka, Kansas 66615. It is authorized to do business and is conducting business in the State of Kansas.

2. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 19 member distribution cooperatives in the State of Kansas, serving more than 120,000 customers.

3. On October 8, 2014, Southern Pioneer Electric Company (Southern Pioneer) filed its application for approval to make changes in its charges for electric service. The Application requests changes in rates for power and energy and the local

access charge for services by Southern Pioneer to customers accessing its 34.5 kV sub-transmission system.

4. KEPCo delivers electric service to two of its members through nine delivery points on the 34.5 kV system owned and operated by Southern Pioneer.

5. KEPCo will be directly affected by any change in the local access charge for transmission services provided to KEPCo by Southern Pioneer, and KEPCo, and ultimately its members, will or may be bound by any Commission order or activity in this proceeding, and KEPCo and its members may be adversely affected thereby.

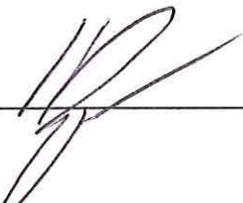
6. KEPCo's interest herein is not adequately represented by any other party.

7. All communications and correspondence to KEPCo, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

William Riggins (# 12080)  
Senior Vice President and General Counsel  
Kansas Electric Power Cooperative, Inc.  
600 SW Corporate View  
Topeka, KS 66615  
785-271-4833  
785-271-4888 (fax)  
[briggins@kepcoco.org](mailto:briggins@kepcoco.org)

Mark Doljac  
Director of Rates and Regulation  
Kansas Electric Power Cooperative, Inc.  
600 SW Corporate View  
Topeka, KS 66615  
785-271-4842  
785-271-4888 (fax)  
[mdoljac@kepcoco.org](mailto:mdoljac@kepcoco.org)

WHEREFORE, KEPCo prays that the Commission enter an Order allowing it to intervene herein and for all other relief which the Commission deems just and proper.

  
\_\_\_\_\_

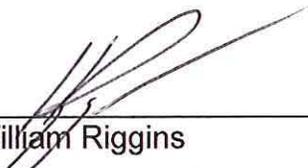
William Riggins (# 12080)  
Senior Vice President and General Counsel  
Kansas Electric Power Cooperative, Inc.  
600 SW Corporate View  
Topeka, KS 66615  
785-271-4833  
785-271-4888 fax  
[briggins@kepco.org](mailto:briggins@kepco.org)

**VERIFICATION**

STATE OF KANSAS            )  
                                          )  
COUNTY OF SHAWNEE        )        ss:

William G. Riggins, of lawful age, being first duly sworn upon his oath states:

That he is an attorney for the above named petitioner, that he has read the above and foregoing Petition to Intervene, and upon information and belief, states that the matters therein appearing are true and correct.

  
\_\_\_\_\_  
William Riggins

SUBSCRIBED AND SWORN to before me this 15<sup>th</sup> day of October, 2014.

  
\_\_\_\_\_  
Notary Public

My Commission expires 2/24/17



**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing was electronically served or placed in the United States mail, postage prepaid, this 15<sup>th</sup> day of October, 2014, addressed to the following:

TERRI PEMBERTON, ATTORNEY

CAFER PEMBERTON LLC  
3321 SW 6TH ST  
TOPEKA, KS 66606

NIKI CHRISTOPHER, ATTORNEY  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604

DAVID SPRINGE, CONSUMER COUNSEL  
CITIZENS' UTILITY RATEPAYER BOARD  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604

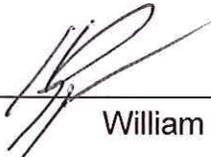
GLENDIA CAFER  
IDEATEK TELCOM,LLC  
CAFER PEMBERTON LLC  
3321 SW 6TH AVE  
TOPEKA, KS 66606

BRIAN G. FEDOTIN, ASSISTANT GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604-4027

ANDREW FRENCH, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604-4027

AMBER SMITH, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604-4027

LINDSAY SHEPARD, EXECUTIVE VP - GENERAL COUNSEL  
SOUTHERN PIONEER ELECTRIC COMPANY  
1850 W OKLAHOMA  
PO BOX 430  
ULYSSES, KS 67880-0430



---

William G. Riggins