

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

In the Matter of a General Investigation)
Regarding the Rate Study and Assessment)
Expenses Resulting from Substitute for) Docket No. 20-GIME-068-GIE
Senate Bill No. 69.)

KANSAS ELECTRIC COOPERATIVE, INC.'S PETITION TO INTERVENE

COMES NOW Kansas Electric Cooperatives, Inc. (“KEC”) 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 intervention in the above-captioned matter. For its Petition to Intervene ("Petition"), KEC states as follows:

1. KEC is the statewide service organization for the rural electric distribution, transmission, and generation cooperatives in Kansas. Formed in 1941, KEC represents the interests of, and provides services, support, programs, and training to, the rural electric cooperatives operating in Kansas. The services provided by KEC include, but are not limited to, legal assistance, regulatory support, education, training and safety programs, communications services, legislative research, and lobbying. KEC’s membership includes 28 distribution cooperatives and two generation and transmission cooperatives serving member-customers in Kansas.

2. On August 20, 2019, the Commission issued its Order Opening General Investigation (“Order”) in the instant docket.¹

3. By way of background, the 2019 Kansas legislature passed, and the Governor signed, Substitute Senate Bill 69 (SB 69) requiring an independent study of factors influencing electric

¹ See Docket No. 20-GIME-068-GIE, *et al.*

utility rates in Kansas and other electric utility issues. The bill became effective April 19, 2019. Electric cooperatives exempt from Commission jurisdiction pursuant to K.S.A. 66-104d, electric public utilities as defined in K.S.A. 66-101a, and the three largest municipally-owned or operated utilities, based on customer count, are subject to the study.² The costs of such study are to be allocated to the utilities subject to the study³. The organization selected to conduct the study may request data from any or all of the subject utilities.⁴

4. KEC's membership will be directly affected in this docket. First, electric cooperative members are subject to the study as participants. As participants, they may or will be required to supply requested data to the organization selected to conduct the study. KEC's membership will also be directly affected as parties who will be assessed the costs of the SB 69 study. KEC also has a direct interest in this proceeding as the statewide association dedicated to supporting electric cooperatives in various areas, including regulatory support. KEC may assist individual cooperative members in fulfilling data requests specific to a particular member. KEC may also assist in the submission of collective data for the electric cooperative system on behalf of its membership. Additionally, to the extent issues may arise in regard to the allocation of the costs of the docket, KEC stands prepared to assist its membership with support and assistance. KEC's participation could serve to create efficiencies by collectively representing some or all of its membership's interest in this proceeding. The study will focus on topics specific to electric cooperatives and other topics, though not cooperative specific, will be of direct interest to individual cooperatives and the broader electric cooperative community which KEC collectively represents.

² 2019 Kansas Session Laws Ch. 31, § 1(a).

³ 2019 Kansas Session Laws Ch. 31, § 1(b)(5).

⁴ 2019 Kansas Session Laws Ch. 31, § 1(b)(2).

5. For the above reasons, KEC and its members, individually and collectively, have a direct interest in the issues to be addressed in this docket and such interest may not be fully and adequately represented by any other party. Further, KEC's members 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 KEC to intervene. K.A.R. 82-1-225(a)(3).

6. In addition to the undersigned counsel, copies of all pleadings, notices, orders and other documents should be sent to the following individuals:

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WHEREFORE, for the above and foregoing reasons, Kansas Electric Cooperatives, Inc. respectfully requests that the commission grants its Petition to Intervene in this docket.

Respectfully submitted,

/s/ Leslie J. Kaufman

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

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

I, Leslie J. Kaufman, being of lawful age, hereby state I have caused the foregoing Petition to Intervene to be prepared; 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/ Leslie J. Kaufman

Leslie J. Kaufman

Executed on the 2nd day of September, 2019

CERTIFICATE OF SERVICE

20-GIME-068-GIV

I hereby certify that a copy of the above and foregoing was sent via U. S. Mail, postage prepaid, hand-delivery, or electronically mailed, this 2nd day of September, 2019, addressed to:

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