

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a General Investigation)
Regarding the Possible Implementation of a) Docket No. 19-GIME-504-GIE
separate Schools-only Tariff in Kansas City)
Power & Light's service territory)

PETITION TO INTERVENE OF SHAWNEE MISSION SCHOOL DISTRICT

Shawnee Mission School District – Unified School District No. 512, Johnson County, State of Kansas ("USD 512") respectfully files this Petition to Intervene in the above-referenced case, pursuant to K.A.R. 82-1-225. In support of its Petition, USD 512 states to the State Corporation Commission of the State of Kansas ("KCC" or "Commission") as follows:

1. On June 27, 2019, the Commission issued its Order Opening General Investigation in accordance with a Settlement approved in KCC Docket No. 18-KCPE-480-RTS. The purpose of this Investigation is to evaluate whether KCP&L should implement a school tariff and how such tariff should be designed and implemented.¹

2. USD 512 is retail ratepayer in the state of Kansas. USD 512 operates numerous educational facilities in the Johnson County area and is one of the largest direct retail customers of Kansas City Power & Light Company ("KCP&L").

3. USD 512 is the third largest school district in Kansas, with more than 27,000 students and 4,300 employees. The District consists of 34 elementary schools, five middle schools, and five high schools. It also operates Horizons High School, an Early Childhood Education Center, and Signature Programs at the Center for Academic Achievement. In total, USD 512's facilities include more than 5.3 million square feet of enclosed space.

¹ Order Opening General Investigation, June 27, 2019, ¶¶ 9, 11.

4. The provision of reliable supplies of electric energy at reasonable prices is critical to the educational operations of USD 512. Kansas electricity costs have risen materially in recent years, with such prices increasing faster than many other budgeted expenses of USD 512. USD 512 strives to be a responsible steward of its public funding. To the extent USD 512 must apply more of this funding to increasing utility costs, those funds cannot be used to meet other direct educational needs.

5. The matters to be considered by the Commission in this proceeding may affect KCP&L's rates for electric service and terms and conditions of service to USD 512. Therefore, USD 512 has a substantial, direct financial interest in all the tariff, rate design, and policy issues that may be addressed, considered, and determined by the Commission in this Docket.

6. USD 512 agrees to accept the state of this Docket in all respects at the time of its Petition and requested intervention herein.

7. No party to this proceeding adequately represents the interests of USD 512. However, USD 512 intends to combine its participation with Blue Valley Schools, Johnson County Community College, Olathe Public Schools, and the Spring Hill School District.

8. USD 512 respectfully requests the right to intervene without limitation in this matter and to fully participate in all aspects of this Docket, including but not limited to the rights to serve relevant discovery, present witness testimony and other evidence, file briefs, motions, and other documents, as appropriate, and fully participate in any Commission hearings.

WHEREFORE, USD 512 respectfully requests the Commission grant its Petition to Intervene in this matter. USD 512 also requests all other relief to which the Commission determines it may be entitled.

Respectfully submitted,

/s/ **Andrew J. French**

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**Attorneys for Shawnee Mission School District
USD 512**

VERIFICATION
K.S.A. 53-601

I verify under penalty of perjury that the foregoing is true and correct.

/s/ Andrew J. French
Andrew J. French

Executed on July 24, 2019.

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or regular U.S. mail, the 24th day of July, 2019, to the parties below:

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