

to the previously approved 34.5kV FBR plan in the 19-240 Docket. Because any change to the 34.5kV FBR will necessarily impact KEPCo, KEPCo has participated in Southern Pioneer's previous annual 34.5kV dockets. KEPCo seeks to intervene in this proceeding in order to determine the impact of Southern Pioneer's continued use of its FBR mechanism on KEPCo in order to continue protecting its own interests and the interests of its Members.

5. For these reasons, KEPCo has a direct and substantial interest in the issues to be addressed in this docket and such interest cannot be adequately represented by any other party. Further, KEPCo may or will be substantially affected by any Commission order or activity in this proceeding. K.S.A. 77-521; 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 KEPCo to intervene. K.S.A. 77-521(b); K.A.R. 82-1-225(a)(3).

6. Because KEPCo will or may be bound by any Commission order or activity in this proceeding and may be adversely affected thereby, and because KEPCo's interest herein may not be adequately represented by any other party, KEPCo respectfully requests its Petition to Intervene be granted without limitation.

7. In addition to the undersigned counsel, service of all pleadings, testimony, briefs, orders, correspondence, and other communication relating to this docket should be sent to the following named individual:

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WHEREFORE, for the above and foregoing reasons, KEPCo respectfully requests that the Commission grant its Petition to Intervene without limitation and for such other relief as the Commission deems just and proper.

Respectfully submitted,

/s/ Susan B. Cunningham

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*Attorney for Kansas Electric Power
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Dated: October 22, 2025

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

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

I, Susan B. Cunningham, verify under penalty of perjury that I have caused the foregoing Petition of Kansas Electric Power Cooperative, Inc. to Intervene to be prepared on behalf of Kansas Electric Power Cooperative, Inc.; that 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/ Susan B. Cunningham

Susan B. Cunningham

Executed on this 22nd day of October 2025.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Petition of Kansas Electric Power Cooperative, Inc. to Intervene was electronically served on this 22nd day of October 2025, to the following named persons appearing on the Commission's service list as last modified on September 30, 2025:

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/s/ Susan B. Cunningham

Susan B. Cunningham