BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of Southern Pioneer Electric)	
Company for Approval of the Continuation)	Docket No. 26-SPEE-099-RTS
of its Formula Based Ratemaking Plan.)	

PETITION OF KANSAS ELECTRIC POWER COOPERATIVE, INC. TO INTERVENE

COMES NOW Kansas Electric Power Cooperative, Inc. ("KEPCo") and, pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, hereby petitions the State Corporation Commission of the State of Kansas ("Commission") for an order permitting it to intervene in the above-captioned docket. In support of its Petition, KEPCo states as follows:

- 1. KEPCo is a corporation duly organized and existing under the laws of the state of Kansas, with its registered office and principal place of business at 600 SW Corporate View, Topeka, Kansas, 66615.
- 2. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 17 member distribution cooperatives ("Members") in the state of Kansas pursuant to all-requirements wholesale electric power agreements. KEPCo's Members serve more than 77,000 consumer-members in the eastern two-thirds of Kansas, which equates to nearly 200,000 rural Kansans.
- 3. On September 17, 2025, Southern Pioneer Electric Company ("Southern Pioneer") filed an application seeking approval to continue utilizing the formula-based rate ("FBR") mechanism that the Commission previously approved in Docket No. 19-SPEE-240-MIS (the "19-240 Docket"). Application at pp. 2-3.
- 4. KEPCo, on behalf of certain of its Members, takes service from Southern Pioneer's 34.5kV facilities pursuant to its Local Access Distribution Service ("LADS") tariff, which is subject

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.

In addition to the undersigned counsel, service of all pleadings, testimony, briefs, 7.

orders, correspondence, and other communication relating to this docket should be sent to the

following named individual:

Rebecca Fowler

Director, Regulatory Affairs

Kansas Electric Power Cooperative, Inc.

600 SW Corporate View

Topeka, KS 66615

Telephone: (785) 271-4843

E-mail: rfowler@kepco.org

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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

Susan B. Cunningham, KS #14083 Senior Vice President & General Counsel Kansas Electric Power Cooperative, Inc. 600 SW Corporate View Topeka, KS 66615

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E-mail: scunningham@kepco.org

Attorney for Kansas Electric Power Cooperative, Inc.

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