

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of Record Natural Gas            )  
Prices and Potential System Reliability        ) Docket No. 21-EKME-329-GIE  
Issues from Unprecedented and                )  
Sustained Cold Weather.                        )

**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, respectfully 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 16 member distribution cooperatives (“Members”) in the state of Kansas pursuant to all-requirements wholesale electric power agreements. KEPCo’s Members collectively serve more than 75,000 retail consumer-members in the eastern two-thirds of Kansas, which equates to nearly 200,000 rural Kansans.
3. On March 9, 2021, the Commission issued its Order Adopting Staff’s Report and Recommendation to Open Company-Specific Investigations; Order on Petitions to Intervene of Bluemark Energy, LLC and CURB; Protective and Discovery Order (“Order”) in Docket No. 21-GIMX-303-MIS. Due to the record natural gas prices and potential system reliability issues from the February 2021 unprecedented and sustained cold weather event, the Commission opened a

series of utility-specific dockets for each regulated public utility to refine its investigation into the impact of such weather event based on each individual utility's specific circumstances, rather than a one-size-fits-all approach. To that end, the purpose of the instant docket is for Evergy to file a financial impact plan (i.e., a plan to minimize the financial effects of the cold weather event) and for KCC staff to tailor its investigation with respect to Evergy's unique circumstances. See Order at pp. 3-5.

4. KEPCo is a co-owner of the Wolf Creek Generating Station with Evergy Metro, Inc. (f/k/a Kansas City Power & Light Company) and Evergy Kansas South, Inc. (f/k/a Kansas Gas and Electric Company d/b/a Westar Energy) (along with Evergy Kansas Central, Inc., collectively "Evergy" or the "Evergy companies"). KEPCo also is a co-owner of Iatan Generating Station Unit 2 with Evergy Metro. In addition to its co-ownership of generation with Evergy Metro and Evergy Kansas South, KEPCo is dependent upon Evergy South's and Evergy Central's generation fleet through a long-term power supply contract. Further, KEPCo is dependent upon the Evergy companies' transmission systems. Due to its unique position as both a generation co-owner and significant wholesale customer of Evergy for generation and transmission service, KEPCo seeks intervention in this case. Indeed, any consideration of system reliability issues and a plan to minimize the financial effects of the February 2021 extreme weather event necessarily impacts KEPCo and its Members.

5. For the above 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.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.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 individuals:

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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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**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*

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Susan B. Cunningham

Executed on this 12<sup>th</sup> day of May, 2021.

**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 12<sup>th</sup> day of May, 2021, to the following named persons appearing on the Commission’s service list as last modified on April 16, 2021:

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*/s/ Susan B. Cunningham*

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Susan B. Cunningham