

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Wheatland)
Electric Cooperative, Inc. for Approval to Make)
Certain Changes in Its Charges for Water) Docket No. 14-WHLW-218-RTS
Service to Tyson Fresh Meats, Inc.)

In the Matter of the Application of Wheatland)
Electric Cooperative, Inc. for a Regulatory)
Order Establishing and Approving Amendment)
No. 1 to Agreement on Facilities Between) Docket No. 14-WHLW-217-CON
Sunflower Electric Power Corporation and)
Wheatland Electric Cooperative, Inc.)

PETITION TO INTERVENE

COMES NOW Sunflower Electric Power Corporation ("Sunflower"), and moves the State Corporation Commission of the State of Kansas ("Commission") to issue an Order allowing Sunflower to intervene in this proceeding. In support of its petition, Sunflower states:

1. On or about November 13, 2013, Wheatland Electric Cooperative, Inc. ("Wheatland") filed its application in this matter for an order approving an amendment to that certain Purchase Agreement for Re-use Water (the "Agreement"), originally dated as of May 23, 2007. On December 3, 2013, the Commission issued its order consolidating Wheatland's application with three other pending applications seeking approval of special rate contracts to three other of its water customers. The Commission suspended the effective date of each of the proposed increases to July 11, 2014.
2. In addition to the undersigned, copies of pleadings, documents, and correspondence in this docket should be sent to:

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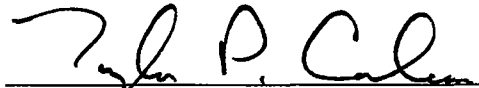
3. Sunflower is a public electric utility who is an industrial water customer of Wheatland at its S2 generation plant in Holcomb, Kansas (the "Plant"). At the Plant, Sunflower uses significant amounts of effluent water delivered by Wheatland, and a reliable and reasonably priced supply of water is essential to its plant operations. In consequence of its need for water, Sunflower entered into a 20-year contract for the purchase of water from Wheatland. By its application, Wheatland seeks to obtain the amendment to the Agreement by filing for approval the Amended and Restated Purchase Agreement for Re-use Water (the "Amended Agreement"). Sunflower clearly has an interest in a jurisdictional contract to which it is a party. This interest is distinct from that of the general public such that it should be allowed to intervene and fully participate in any proceedings related to the amendment. No other party can adequately represent Sunflower's interest in this matter.

4. Sunflower's legal rights, duties, privileges, immunities or other legal interests may be substantially affected by this proceeding, and the interests of justice

and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. For the above reasons, Sunflower requests that the Commission grant its request and allow Sunflower to fully participate in this matter.

WHEREFORE, Sunflower requests that the Commission issue its Order granting Sunflower's petition to intervene in this matter and for such other and further relief as may be appropriate.

Respectfully submitted,



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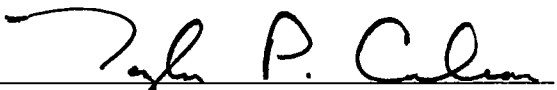
**Attorneys for Sunflower Electric
Power Corporation**

VERIFICATION

STATE OF KANSAS)
COUNTY OF BARTON) ss:

Taylor P. Calcara, of lawful age, being first duly sworn on oath, states:

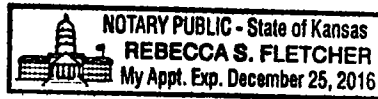
That he is an attorney for Sunflower Electric Power Corporation; that he has read the above and foregoing Petition to Intervene and knows the contents thereof; and that the statements contained therein are true.


Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 21st day of January, 2014.



Notary Public

Commission Expires: _____



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 21st day of January 2014, the above and foregoing *Petition to Intervene* was submitted to Kim Christiansen, Executive Director, Kansas Corporation Commission via electronic delivery, and by electronic mail to the following parties who have waived receipt of follow-up hard copies:


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