THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Mid-Kansas	s)		
Electric Company, LLC for an Order Approvir	ng)		
The Conversion of Mid-Kansas Electric)	Docket No.	18-MKEE-014-MIS
Company, LLC to Mid-Kansas Electric)		
Company, Inc.)		

PETITION OF KANSAS ELECTRIC POWER COOPERATIVE, INC. TO INTERVENE

Comes now Kansas Electric Power Cooperative, Inc. (KEPCo) and moves the Corporation Commission of the State of Kansas (Commission) for an order pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 permitting it to intervene in the above captioned proceeding. In support of its petition, KEPCo alleges and states as follows:

- 1. KEPCo is a corporation duly organized under the laws of the State of Kansas, with its principal place of business at 600 SW Corporate View, Topeka, Kansas 66615. It is authorized to do business and is conducting business in the State of Kansas.
- 2. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 19 member distribution cooperatives in the State of Kansas, serving approximately 300,000 consumer members.
- 3. On July 12, 2016, Mid-Kansas Electric Company, LLC (Mid-Kansas) submitted its application for approval of Mid-Kansas to convert from a limited liability company to a corporation.
- 4. The delivery costs of KEPCo to its members is affected by the rates for 34.5-kV Local Access Delivery Service charged by the member-owners of Mid-Kansas.

Therefore, KEPCo and, ultimately, its members will or may be bound by any Commission order or activity in this proceeding, and KEPCo and its members may be adversely affected thereby.

- 5. KEPCo's interest herein is not adequately represented by any other party.
- 6. All communications and correspondence to KEPCo, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

William Riggins (# 12080)
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Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
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Mark Doljac
Director of Rates and Regulation
Kansas Electric Power Cooperative, Inc.
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WHEREFORE, KEPCo prays that the Commission enter an Order allowing it to intervene herein and for all other relief which the Commission deems just and proper.

William Riggins (# 12080) Kansas Electric Power Cooperative, Inc.

> 600 SW Corporate View Topeka, KS 66615 785-271-4833 785-271-4888 fax

> > briggins@kepco.org

VERIFICATION

STATE OF KANSAS)	
)	SS:
COUNTY OF SHAWNEE)	

William Riggins, of lawful age, being first duly sworn upon his oath states:

That he is an attorney for the above named petitioner, that he has read the above and foregoing Petition to Intervene, and upon information and belief, states that the matters therein appearing are true and correct.

William Riggins

SUBSCRIBED AND SWORN to before me this day of July

Notary Public

My Commission expires

KELSEY SCHREMPP
NOTARY PUBLIC
STATE OF KANSAS
My Appl Exp.: 2 24 2021

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing was electronically served this day of July, 2017, addressed to the following:

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