

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Grain Belt)
Express, LLC for a Siting Permit for the)
Construction of Two 345 kV Transmission Lines) Docket No. 24-GBEE-790-STG
and Associated Facilities through Gray, Meade,)
and Ford Counties, Kansas.)

PETITION TO INTERVENE AND REQUEST FOR EXPEDITED ORDER

COMES NOW Sunflower Electric Power Corporation (“Sunflower”), and pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, moves the Commission to issue an Order allowing Sunflower to intervene in this proceeding. In support of its Petition to Intervene Sunflower states:

1. Sunflower is a generation and transmission electric utility operating in the state of Kansas on a non-profit cooperative basis, with its principal place of business located in Hays, Kansas. Sunflower is a certificated electric public utility that has elected to exempt itself from the jurisdiction, supervision and control of the Commission pursuant to K.S.A. 66-104d.¹ Sunflower remains subject to the Commission’s jurisdiction for those items referenced in K.S.A. 66-104d(f).

2. In addition to the undersigned, copies of pleadings, documents, and correspondence in this docket should be sent to:

¹ Order Affirming Sunflower Electric Power Corporation’s Electric to Deregulate, Docket No. 10-SEPE-072-DRC (filed September 28, 2009).

Sunflower Electric Power Corporation 301 W. 13th Street P.O. Box 980 Hays, Kansas 67601	James Brungardt Manager, Regulatory Regulations jbrungardt@sunflower.net	Amanda Wray Corporate Paralegal awray@sunflower.net
Al Tamimi SVP & COO – Transmission atamimi@sunflower.net	Clarence Suppes Senior Manager Transmission Engineering cdsuppes@sunflower.net	

3. Pursuant to K.S.A. 77-521(a)(2)-(3) and K.A.R. 82-1-225(2)-(3), the Commission shall grant a petition for intervention if the petition states facts demonstrating that the petitioner’s legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding, and the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

4. Sunflower owns transmission lines in the area in which Grain Belt Express, LLC’s (“Grain Belt”) transmission line proposed in this proceeding will traverse. In addition, some of its members may own distribution facilities in the area, which are connected to Sunflower’s transmission lines and ultimately serve Kansas ratepayers. Sunflower’s transmission lines and the load connected to the end of Sunflower’s members’ connected distribution lines may be affected by the ultimate location of Grain Belt’s transmission lines, which will be determined in this docket. The Commission established a procedural schedule on June 11, 2024 in this docket, and Sunflower expects its participation to be subject to that existing procedural schedule.

5. 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.

6. Grain Belt has requested, and received approval of, an expedited procedural schedule for this docket.² Because the existing expedited procedural schedule requires interveners to file testimony by July 3, 2024, Sunflower requests an expedited order on this Petition to Intervene so that it can quickly and fully participate in this docket.

WHEREFORE, Sunflower requests that the Commission issue an Order granting its Petition to Intervene in this matter and for such other and further relief as may be appropriate.

Respectfully submitted,

/s/ Taylor P. Calcara

Taylor P. Calcara, #25561
Jeffrey M. Kuhlman #26865
Watkins Calcara, Chtd.
Suite 300, 1321 Main Street
P.O. Drawer 1110
Great Bend, Kansas 67530
(620) 792-8231 telephone
(620) 792-2775 facsimile
tcalcara@wcrf.com

**COUNSEL FOR SUNFLOWER
ELECTRIC POWER CORPORATION**

² Motion to Adopt Procedural Schedule and for Expedited Treatment, Docket No. 24-GBEE-790-STG (filed June 3, 2024); Order Setting Procedural Schedule, Docket No. 24-GBEE-790-STG (filed June 11, 2024).

VERIFICATION

STATE OF KANSAS)
COUNTY OF ELLIS) ss:

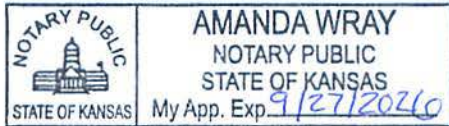
Taylor P. Calcara, of lawful age, being first duly sworn on oath, states:


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 27th day of June, 2024.





Notary Public

Commission Expires: 9/27/2026

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 27th day of June 2024, the above and foregoing *Petition to Intervene* was submitted to the following parties via electronic mail:

Amanda Wray

Service list as of June 5, 2024

KEVIN CHANDLER
DIRECTOR, TRANSMISSION
BUSINESS DEVELOPMENT
GRAIN BELT EXPRESS LLC
ONE SOUTH WACKER DRIVE
STE 1800
CHICAGO, IL 60606
kchandler@invenergy.com

NICOLE LUCKEY
SENIOR VICE PRESIDENT
GRAIN BELT EXPRESS LLC
ONE SOUTH WACKER DRIVE
STE 1800
CHICAGO, IL 60606
nluckey@invenergy.com

BRAD PNAZEK
VP TRANSMISSION BUSINESS
DEVELOPMENT
GRAIN BELT EXPRESS LLC
ONE SOUTH WACKER DRIVE
STE 1800
CHICAGO, IL 60606
bpnazeck@invenergy.com

BRIAN G. FEDOTIN
GENERAL COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
b.fedotin@kcc.ks.gov

CARLY MASENTHIN
LITIGATION COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
c.masenthin@kcc.ks.gov

KYLER C. WINEINGER
ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
k.wineinger@kcc.ks.gov

ANNE E. CALLENBACH
POLSINELLI PC
900 W 48TH PLACE
STE 900
KANSAS CITY, MO 64112
acallenbach@polsinelli.com

JARED R. JEVONS
POLSINELLI PC
900 W 48TH PLACE
STE 900
KANSAS CITY, MO 64112
JJJEVONS@POLSINELLI.COM

ANDREW O. SCHULTE
POLSINELLI PC
900 W 48TH PLACE
STE 900
KANSAS CITY, MO 64112
aschulte@polsinelli.com