

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of Great Plains)
Energy Incorporated, Kansas City Power & Light)
Company and Westar Energy, Inc. for approval of the) Docket No. 16-KCPE-593-ACQ
Acquisition of Westar Energy, Inc. by Great Plains)
Energy Incorporated)

PETITION TO INTERVENE OF
THE GOODYEAR TIRE & RUBBER COMPANY

The Goodyear Tire & Rubber Company (“Goodyear”) respectfully files this Petition to Intervene in the above-referenced case. In support of its Petition, Goodyear states to the State Corporation Commission of the State of Kansas (“KCC” or “Commission”) as follows:

1. On June 28, 2016, Westar Energy, Inc. (“Westar”), Great Plains Energy Incorporated (“Great Plains”) and Kansas City Power & Light Company (“KCP&L”), (Westar, Great Plains, and KCP&L, collectively “Joint Applicants”) filed an Application (“Application”) for the approval of the acquisition of Westar by Great Plains.

2. Goodyear’s Topeka facilities are among the largest manufacturing operations in the state of Kansas. Goodyear employs several hundred people in Kansas, and creates substantial economic activity in and around Topeka and Shawnee County, Kansas. Goodyear is one of Westar’s largest, direct retail electric customers. Goodyear purchases electric energy from Westar. The cost of retail electric energy and the terms and conditions for the service of electric energy, are of major importance to the business operations of Goodyear. The matters to be considered by the Commission in the above entitled KCC Docket, may affect Westar’s current or future rates, and terms and conditions of service to Goodyear. Therefore, Goodyear has a substantial, direct financial interest in all of the costs of service, rate design, tariffs, and policy issues that may be addressed, considered, and determined by the Commission in this Docket.

3. Goodyear agrees to accept the state of this Docket in all respects at the time of its Petition and requested Intervention herein.

4. No party to this proceeding adequately represents the interests of Goodyear in this proceeding.

5. Goodyear respectfully requests the right to fully intervene without limitation in this matter and to participate in all aspects of this Docket, including but not limited to serving discovery, filing motions and other pleadings as appropriate, presenting oral argument, and fully participating in any Commission hearings in this Docket.

WHEREFORE, Goodyear respectfully requests that the Commission grant its Petition for Intervention. Goodyear also requests all other relief to which the Commission determines that it may be entitled.

Respectfully submitted,

/s/ James P. Zakoura

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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

James P. Zakoura, of lawful age, being first duly sworn, upon oath states:

That he is the attorney for the Intervenor, The Goodyear Tire & Rubber Company, that he has read the above and foregoing Petition to Intervene, knows the contents thereof, and knows that all of the statements made therein are true.



James P. Zakoura

SUBSCRIBED AND SWORN to before me this 1st day of July, 2016.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or regular U.S. mail (unless otherwise noted), the 1st day of July, 2016 to the parties below:

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