

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of Westar Energy, Inc. and)
Kansas Gas and Electric Company Seeking)
Commission Approval to Implement) Docket No. 19-WSEE-327-TAR
Changes in their Transmission Delivery)
Charges Rate Schedules.)

PETITION TO INTERVENE OF CARGILL

Cargill, Incorporated ("Cargill"), respectfully files this Petition to Intervene in the above-referenced case, pursuant to K.A.R. 82-1-225. In support of its Petition, Cargill states to the State Corporation Commission of the State of Kansas ("KCC" or "Commission") as follows:

1. On February 15, 2019, Westar Energy, Inc., and Kansas Gas and Electric Company (collectively referred to as "Westar") filed a report updating its Transmission Delivery Charge ("TDC") tariff to recover transmission-related costs associated with its retail operations.

2. Cargill is a ratepayer in the state of Kansas and is a retail customer of Westar. Cargill has multiple business operations in the state of Kansas that have direct purchases of electric energy from Westar. The provision of reliable supplies of electric energy at reasonable prices is critical to the business operations of Cargill. The matters to be considered by the Commission in this proceeding may affect Westar's rates for electric service and terms and conditions of service to Cargill. Therefore, Cargill has a substantial, direct financial interest in all the cost of service, rate design, tariff, and policy issues that may be addressed, considered, and determined by the Commission in this Docket.

3. Cargill 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 Cargill. However, Cargill intends to participate, as appropriate, through the Kansas Industrial Consumers Group, Inc. ("KIC"). KIC filed a Petition to Intervene in this Docket on February 26, 2019.

5. Cargill respectfully requests the right to intervene without limitation in this matter and to fully participate in all aspects of this Docket, including but not limited to the rights to serve relevant discovery, present witness testimony and other evidence, file briefs, motions, and other documents, as appropriate, and fully participating in any Commission hearings.

WHEREFORE, Cargill respectfully requests the Commission grant its Petition to Intervene in this matter. Cargill also requests all other relief to which the Commission determines it may be entitled.

Respectfully submitted,

/s/ **Andrew J. French**

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VERIFICATION

STATE OF KANSAS)
)
COUNTY OF JOHNSON) ss:

Andrew J. French, being duly sworn upon his oath, deposes and states that he is the Attorney for Cargill, Incorporated, that he has read and is familiar with the foregoing *Petition to Intervene of Cargill*, and the statements therein are true to the best of his knowledge, information, and belief.



Andrew J. French

SUBSCRIBED AND SWORN to before me this 26th day of February, 2019.



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 26th day of February, 2019, to the parties below:

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/s/ **Andrew J. French**

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