

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

In the Matter of Southern Pioneer Electric Company)
for Approval of the Continuation of its Formula Based)
Ratemaking Plan.) Docket No. 26-SPEE-099-RTS
)
)

PETITION TO INTERVENE OF THE KANSAS MUNICIPAL ENERGY AGENCY

Pursuant to K.S.A. §77-521 and K.A.R. §82-1-225, the Kansas Municipal Energy Agency (KMEA) hereby petitions the State Corporation Commission of the State of Kansas (Commission) for an order granting KMEA’s intervention in the above-captioned matter. In support thereof, KMEA states the following:

1. KMEA is a quasi-municipal corporation duly organized under the laws of the State of Kansas,¹ with its principal place of business at 6300 West 95th Street, Overland Park, Kansas 66212. KMEA is authorized to plan, finance, and construct projects for the purchase, sale, generation, and transmission of electricity for purposes of securing an adequate, economical, and reliable supply of electricity and energy for its municipal electric utility membership. KMEA’s membership includes more than 88 member cities across the State.

2. On September 17, 2025, Southern Pioneer Electric Company (Southern Pioneer) filed an application seeking Commission approval to “continue utilizing the FBR mechanism” that the Commission previously approved in Docket No. 19-SPEE-240-MIS.²

3. Certain of KMEA member-cities take service under Southern Pioneer’s Local Access Delivery Service (LADS) tariff, which is subject to the previously approved 34.5kV

¹ K.S.A. §12-885 *et seq.*

² Application, pp. 2-3, ¶¶ 5-6.

formula-based rate plan (34.5kV FBR Plan). KMEA has participated in Southern Pioneer's previous annual 34.5kV FBR dockets and seeks intervention in this proceeding to continue protecting the interests of its member-cities.

4. K.S.A. §77-521 provides, in part, that petitions for intervention shall be granted 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 or that the petitioner qualifies as an intervener under any provision of law... and... the presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention."³ Further, the Commission has discretion to allow intervention "at any time upon determining that the intervention sought is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings."⁴

5. KMEA will or may be bound by any order issued by this Commission and may be substantially affected by the outcome of this proceeding or portions thereof. Further, KMEA's interests herein are not adequately represented by any other party to this proceeding.

6. All pleadings, orders, notices, communications, and other documents relating to this matter should be served on the undersigned counsel, and on the individual(s) listed below:

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³ See also, K.A.R. §82-1-225.

⁴ K.S.A. §77-521(b).

WHEREFORE, KMEA respectfully requests the Commission issue an order granting KMEA intervention in this proceeding, and for any and all other such relief the Commission deems just and proper.

Respectfully Submitted,

/s/ Terri J. Pemberton

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing *Petition to Intervene of Kansas Municipal Energy Agency* was electronically served on this 26th day of September 2025, to the following named persons appearing on the Commission's service list last modified on September 19, 2025:

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