BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Joint Application of Mid-Kansas Electric Company, LLC, Sunflower Electric Power Corporation, Prairie Land Electric Cooperative, Inc., Pioneer Electric Cooperative, Inc., The Victory Electric Cooperative Association, Inc., Western Cooperative Electric Association, Inc., Wheatland Electric Cooperative, Inc. and Southern Pioneer Electric Company for Approval of a Local Access Tariff and Mid-Kansas and Sunflower Open Access Transmission Tariff.

Docket No. 18-MKEE-160-TAR

JOINT RESPONSE TO PETITION OF THE CITY OF GARDEN CITY, KANSAS TO INTERVENE

COMES NOW, Mid-Kansas Electric Company, LLC ("Mid-Kansas"), Sunflower

Electric Power Corporation ("Sunflower"), Prairie Land Electric Cooperative, Inc.

("Prairie Land"), Pioneer Electric Cooperative, Inc. ("Pioneer"), The Victory Electric

Cooperative Association, Inc. ("Victory"), Western Cooperative Electric Association, Inc.

("Western"), Wheatland Electric Cooperative, Inc. ("Wheatland") and Southern Pioneer

Electric Company ("Southern Pioneer")(collectively referred to as the "Joint

Respondents"), and hereby file this Joint Response to the Petition of the City of Garden

City, Kansas to Intervene ("Joint Response") in the above-captioned matter. In support

of their Joint Response, Joint Respondents state the following:

1. On October 11, 2017, the Joint Respondents filed their Joint Application seeking approval of a Local Access Tariff ("LAT") for the Mid-Kansas Member-owned 34.5 kV facilities, a Local Access Tariff for the Sunflower Member-owned 34.5 kV

facilities, a revised Mid-Kansas Open Access Transmission Tariff, and a revised Sunflower Open Access Transmission Tariff.¹

2. On November 13, 2017, the City of Garden City, Kansas ("Garden City") filed its Petition to Intervene requesting intervention into this docket with full right of participation.²

3. Joint Respondents have no objection to Garden City's request for intervention, and without waiving our right to respond to the assertions by Garden City, Joint Respondents will reserve the right to respond to Garden City's assertions at the more appropriate time in the proceeding.

WHEREFORE, Joint Respondents express no objection to Garden City's intervention and reserve the right to respond to the substantive issues raised in Garden City's petition at the appropriate time.

Respectfully submitted,

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ON BEHALF OF THE JOINT RESPONDENTS

¹ Joint Application for Approval of Local Access Tariff and Mid-Kansas and Sunflower Open Access

Transmission Tariffs, Docket No. 18-MKEE-160-TFR (filed October 11, 2017).

² Petition by the City of Garden City, Kansas to Intervene

Verification

STATE OF KANSAS

COUNTY OF ELLIS

)) ss:)

MARK D. CALCARA, of lawful age, being first duly sworn on oath, states:

That he is an attorney submitting this filing on behalf of the Joint Respondents named in the foregoing Joint Response, knows the contents thereof, and that the facts set forth therein are true and correct to the best of his knowledge, information, and belief.

SUBSCRIBED AND SWORN to before me this 22nd day of November, 2017.

NOTARY PUBLIC - State of Kansas Reneé K. Braun My Appl. Expires 4130/2018

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Notary Public

My Appointment Expires: April 30,2018

CERTIFICATE OF SERVICE

I do hereby certify that on the 22nd day of November, 2017, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing *Joint Response* with an electronic copy e-mailed to:

/s/ Renee K. Braun

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