

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

In the Matter of the Application of Western )  
Cooperative Electric Association, Inc., Seeking )  
Commission Approval to Update Its Local ) Docket No. 24-WSTE-682-TAR  
Access Delivery Service Tariff Pursuant to the )  
34.5kV Formula Based Rate Plan Approved in )  
Docket No. 21-SEPE-049-TAR. )

**PETITION TO INTERVENE BY KPP ENERGY**

COMES NOW, KPP Energy, A Municipal Energy Agency (“KPP”) and moves the Corporation Commission of the State of Kansas (“Commission”) for an order pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 permitting it to intervene in the above-captioned proceeding. In support of its Petition, KPP alleges and states as follows:

1. KPP is a municipal energy agency formed under K.S.A. 12-885, *et seq.*
2. KPP provides wholesale capacity, energy and transmission services to its members, who have all signed KPP’s Amended Operating Agreement. Currently, KPP serves 24 Kansas municipal electric utilities. KPP’s members are located in the Westar Energy transmission zone, the Sunflower Electric Power Corporation zone, and in the Midwest Energy zone.
3. On April 29, 2024, Western Cooperative Electric Association, Inc. (“Western”) filed an application with the Commission for the purpose of updating its Local Access Delivery Service (“LADS”) tariff pursuant to the 34.5kV Formula Based Rate (“34.5kV FBR”) plan approved in Docket No. 21-SEPE-049-TAR.
4. Western owns and operates 34.5kV sub-transmission facilities that provide service to both retail customers and wholesale local access customers. The wholesale local access customers’ combined load ration share of the total 34.5kV system revenue requirement for these

facilities is recovered through the LADS tariff.

5. KPP is one of Western's wholesale local access customers, and thus, is required to pay the LADS rates under Western's 34.5kV FBR plan. Furthermore, three of KPP's member cities, namely, Holyrood, Lucas, and Luray, are served by Western's facilities.

6. KPP and, ultimately, its members will or may be bound by any Commission Order or activity in this proceeding, and KPP and its members may be adversely affected thereby.

7. KPP's interests herein are not adequately represented by any other party, and its intervention will not impair the orderly and prompt conduct of the proceedings.

8. All communication and correspondence to KPP, including service of all Notices and Orders of this Commission herein, are requested to be sent to the following named individuals:

Colin Hansen  
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WHEREFORE, KPP prays that the Commission enter an order allowing it to intervene and fully participate in this docket, including but not limited to the right to conduct discovery, file pleadings and testimony, present oral argument, and fully participate in any scheduled hearings, and for all other relief which the Commission deems just and proper.

Respectfully submitted,

TRIPLETT WOOLF GARRETSON, LLC

By: /s/ Kacey S. Mayes

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*Attorneys for KPP Energy*

VERIFICATION

STATE OF KANSAS )  
 ) ss:  
COUNTY OF SEDGWICK )

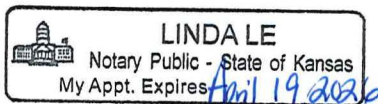
Kacey S. Mayes, of lawful age, being first duly sworn upon my oath, state that I am one of the attorneys for KPP Energy, A Municipal Energy Agency; that I have read the above Petition; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.

Kacey S. Mayes  
Kacey S. Mayes, 28224

SUBSCRIBED AND SWORN to before me this 7<sup>th</sup> day of May, 2024.

Linda L  
Notary Public

My Appointment Expires:



**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2024 the *Petition to Intervene by KPP Energy* was served via electronic mail to:

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/s/ Kacey S. Mayes  
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