

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

In the Matter of the Annual Filing of )  
Southern Pioneer Electric Company for )  
Approval to Make Certain Changes to Its ) Docket No. 21-SPEE-411-RTS  
Charges for Electric Services, Pursuant to )  
the Consolidated Formula Based )  
Ratemaking Plan Approved in Docket No. )  
19-SPEE-240-MIS and Implementation of )  
Rate Adjustment Pursuant to Docket No. )  
20-SPEE-169-RTS. )

**PETITION OF THE KANSAS POWER POOL TO INTERVENE**

COMES NOW the Kansas Power Pool (“KPP”), a Municipal Energy Agency, 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 May 3, 2021, Southern Pioneer Electric Company (“Southern Pioneer”), pursuant to K.S.A. 66-117 and in accordance with the Order Approving Settlement of the Commission issued in Docket No. 19-SPEE-240-MIS, filed its first annual rate adjustment under its Consolidated Formula Based Ratemaking Plan (“Consolidated FBR Plan”), which includes the annual adjustment to Southern Pioneer’s retail rates and its annual adjustment to both retail rates and wholesale Local Access Delivery Service (“LADS”) for services over Southern Pioneer’s

34.5kV sub-transmission system. Additionally, the application includes the rate adjustments approved in the Commission's July 14, 2020 Order issued in Southern Pioneer's last general rate case in Docket No. 20-SPEE-169-RTS, including the re-basing of property taxes.

4. KPP is one of Southern Pioneer's wholesale local access customers, and thus, is required to pay the LADS rates under the Consolidated FBR Plan. Furthermore, Southern Pioneer services two KPP member cities, namely, Greensburg and Kingman, as well as the Greensburg Wind Farm.

5. 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.

6. 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.

7. 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:

Larry Holloway  
Assistant General Manager/Operations  
Kansas Power Pool  
100 North Broadway, Suite L110  
Wichita, Kansas 67202  
Phone: (316) 425-0431  
Fax: (888) 431-4943  
E-mail: [lholloway@kpp.agency](mailto:lholloway@kpp.agency)

Mark Chesney  
CEO/General Manager  
Kansas Power Pool  
100 North Broadway, Suite L110  
Wichita, Kansas 67202  
Phone: (316) 425-0431  
Fax: (888) 431-4943  
E-mail: [mchesney@kpp.agency](mailto:mchesney@kpp.agency)

James Ging  
Director of Engineering Services  
Kansas Power Pool  
100 North Broadway, Suite L110  
Wichita, Kansas 67202  
Phone: (316) 425-0431  
Fax: (888) 431-4943  
E-mail: [jging@kpp.agency](mailto:jging@kpp.agency)

Kimberlyn J. Gilchrist (#27445)  
Attorney  
Triplett Woolf Garretson, LLC  
2959 North Rock Road, Suite 300  
Wichita, Kansas 67226  
Phone: (316) 630-8100  
Fax: (316) 630-8101  
E mail: [kjgilchrist@twgfirm.com](mailto:kjgilchrist@twgfirm.com)

WHEREUPON, KPP prays that the Commission enter an order allowing it to intervene in this proceeding and for all other relief which the Commission deems just and proper.

Respectfully submitted,

TRIPLETT WOOLF GARRETSON, LLC

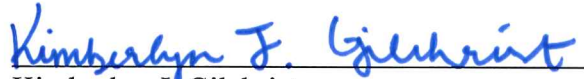
By: /s/ Kimberlyn J. Gilchrist

Kimberlyn J. Gilchrist, No. 27445  
Triplett Woolf Garretson, LLC  
2959 N Rock Road, Suite 300  
Wichita, Kansas 67226  
Phone: (316) 630-8100  
Facsimile: (316) 630-8101  
[kjgilchrist@twgfirm.com](mailto:kjgilchrist@twgfirm.com)  
*Attorneys for the Kansas Power Pool*


VERIFICATION

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SEDGWICK    )

Kimberlyn J. Gilchrist, of lawful age, being first duly sworn upon my oath, states that I am one of the attorneys for the Kansas Power Pool; 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.

  
\_\_\_\_\_  
Kimberlyn J. Gilchrist

SUBSCRIBED AND SWORN to before me this 10th day of May, 2021.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires:



**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of May, 2021, the Petition of the Kansas Power Pool to Intervene was served via electronic mail to:

Glenda Cafer, Attorney  
Glenda Cafer  
800 SW Jackson, Suite 1310  
Topeka, KS 66612-1216  
[Gcafer@morrislaing.com](mailto:Gcafer@morrislaing.com)

Phoenix Anshutz, Assistant General Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Rd  
Topeka, KS 66604  
[p.anshutz@kcc.ks.gov](mailto:p.anshutz@kcc.ks.gov)

Carly Masenthin, Litigation Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Rd  
Topeka, KS 66604  
[c.masenthin@kcc.ks.gov](mailto:c.masenthin@kcc.ks.gov)

Larissa Batterton, Legal Executive Assistant  
Southern Pioneer Electric Company  
1850 W Oklahoma  
PO Box 430  
Ulysses, KS 67880-0368  
[lbatterton@pioneerelectric.coop](mailto:lbatterton@pioneerelectric.coop)

Lindsay Campbell, Executive VP - General  
Counsel  
Southern Pioneer Electric Company  
1850 W Oklahoma  
PO Box 430  
Ulysses, KS 67880-0368  
[lcampbell@pioneerelectric.coop](mailto:lcampbell@pioneerelectric.coop)

Chantry Scott, CFO, VP Of Finance and  
Accounting  
Southern Pioneer Electric Company  
1850 West Oklahoma  
PO Box 403  
Ulysses, KS 67880  
[cscott@pioneerelectric.coop](mailto:cscott@pioneerelectric.coop)

*/s/ Kimberlyn J. Gilchrist*

\_\_\_\_\_  
Kimberlyn J. Gilchrist, No. 27445