

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

In the Matter of the General Investigation to )  
Examine Issues Surrounding Rate Design for ) Docket No. 16-GIME-403-GIE  
Distributed Generation Customers )

**PETITION TO INTERVENE**

COMES NOW Sunflower Electric Power Corporation (“Sunflower”) and Mid-Kansas Electric Company, LLC (“Mid-Kansas”), and moves the Commission to issue an Order allowing Sunflower and Mid-Kansas to intervene in this proceeding. In support of their petition, Sunflower and Mid-Kansas state:

1. On March 11, 2016, Commission Staff (“Staff”) filed a motion requesting a Commission order opening a general investigation to examine various issues surrounding rate design for distributed generation customers. Staff’s Report and Recommendation (“R&R”) detailed Staff’s summary and concerns regarding the issues presented by this general investigation, which was in part based off of comments from several utilities.

2. Sunflower and Mid-Kansas are affiliated non-profit cooperative generation and transmission utilities, and each holds a certificate to transact business as a generation and transmission utility in the State of Kansas. Sunflower is owned by the following six retail certificated distribution cooperatives: Lane-Scott Electric Cooperative (“Lane-Scott”), 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”), and Wheatland Electric Cooperative, Inc. (“Wheatland”) (collectively, the “Sunflower Members”). Mid-Kansas is owned by Lane-Scott, Prairie Land, Victory, Western, Wheatland, and

Southern Pioneer Electric Company (a wholly-owned subsidiary of Pioneer holding its own retail certificate of convenience) (collectively, the “Mid-Kansas Members”).

3. Pursuant to K.S.A. 77-521(a)(2)-(3) and K.A.R. 82-1-225(2)-(3), the Commission shall grant a petition for intervention 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, and the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

4. The purpose of this docket is to research and evaluate issues that directly affect Sunflower, Mid-Kansas, and their member-owners. Sunflower and Mid-Kansas provided comments to Staff during Staff’s coordination with utilities prior to outlaying the issues presented in their R&R. Both utilities wish to continue to participate in the evaluation of these issues as this docket moves forward.

5. Therefore, Sunflower’s and Mid-Kansas’ legal rights, duties, privileges, immunities or other legal interests may be substantially affected by this proceeding, and the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. For the above reasons, Sunflower and Mid-Kansas request that the Commission grant their request and allow Sunflower and Mid-Kansas to fully participate in this matter.

6. In addition to the undersigned, all communications and correspondence to Sunflower and Mid-Kansas, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

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WHEREFORE, Sunflower and Mid-Kansas request that the Commission issue an Order granting Sunflower's and Mid-Kansas' petition to intervene in this matter and for such other and further relief as may be appropriate.

Respectfully submitted,



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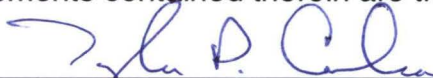
**Attorneys for Sunflower Electric  
Power Corporation and Mid-Kansas  
Electric Company, LLC**

**VERIFICATION**

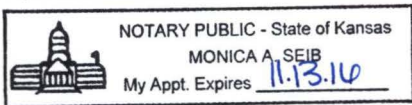
STATE OF KANSAS            )  
COUNTY OF Ellis        ) ss:

Taylor P. Calcara, of lawful age, being first duly sworn on oath, states:

That he is an Attorney for Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC; that he has read the above and foregoing Petition to Intervene and knows the contents thereof; and that the statements contained therein are true.

  
\_\_\_\_\_  
Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 11 day of April, 2016.



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

Commission Expires: 11/13/16

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 11 day of April, 2016, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing Petition to Intervene with a copy e-mailed to:



Monica A. Seib

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