

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

BEFORE COMMISSIONERS: Dwight Keen, Chair
Shari Feist Albrecht, Commissioner
Susan K. Duffy, Commissioner

In The Matter of a General Investigation)
Regarding the Possible Implementation of a)
separate Schools-only Tariff in Kansas City) Docket No. 19-GIME-504-GIE
Power & Light's service territory.)

PETITION TO INTERVENE

COMES NOW, Unified School District #259 Sedgwick County, Kansas (hereinafter "USD 259") and respectfully moves the Corporation Commission of the State of Kansas (the "Commission") for an order permitting its intervention and participation in the captioned proceeding. In support of its Petition, USD 259 states:

1. USD 259 comprises the Wichita Public School system and is the largest public school system and district in the state of Kansas, serving approximately 51,000 students in more than 100 buildings.

2. On June 27, 2019, the Commission issued an Order Opening a General Investigation regarding a study to determine whether a separate school tariff is appropriate for the KCP&L service territory.

3. Except for one of over 100 buildings, USD 259 takes all of its electric service from Westar Energy, Inc. through a separate school tariff.

4. Now that Westar Energy, Inc. and KCP&L have merged under the name Evergy, Inc., the establishment of a separate school tariff for the KCP&L territory could well have a future impact on the school tariff currently in place for the Westar territory from which USD 259 takes its service.

5. All public schools in Kansas are financed through taxes paid by the citizens of the state. As such, it is important that electric service rates for all public schools be just and reasonable rates for the service that is provided.

6. The establishment of a separate tariff for all public schools is important so that it can be determined that the service provided is appropriate and that the public schools are not subsidizing or being subsidized by other classes of service.

7. The result of the proposed study could impact the rates and how the class service is determined with respect to USD 259's service in the current Westar territory. It is entirely possible that in the future the now merged entities Westar Energy, Inc. and KCP&L will begin to do business as one service territory under their newly merged identity of Evergy, Inc. Therefore, it is important to USD 259 with respect to its operations for the education students that there may be a separate service rate for all public schools that can be separately analyzed to determine that the service and charges, therefore, are fair and reasonable regardless of the location of the public school or the service territory of the entity providing said service.

8. USD 259 seeks to intervene in this proceed for the purpose of filing comments with respect to the report that is anticipated to be concluded by KCP&L, as well as the comments of other parties in this Docket. The intervention by USD 259 would serve the interests of justice and the provision of fair and reasonable electric service to public schools and will not interfere or impair the orderly and prompt conduct of these proceedings. Electronic service of this Petition upon its filing is provided to the following persons listed on the attached Certificate of Service.

WHEREFORE, USD 259 respectfully requests that the Commission grant its Petition to Intervene as set out herein.

Respectfully submitted,

TRIPLETT WOOLF GARRETSON, LLC

By  _____
Timothy E. McKee, #07135
Amy Fellows Cline, #19995
Attorneys for USD 259

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Sharon Rye, of lawful age, being first duly sworn, upon oath states: She is the Associate General Counsel for USD 259, and that she has read the above Petition to Intervene, knows the contents and knows that the statements made therein are true and correct, to the best of her knowledge and belief.

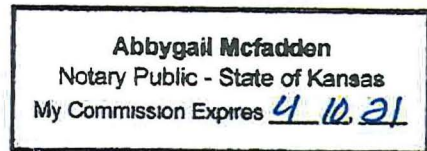
Sharon Rye
SHARON RYE

SUBSCRIBED AND SWORN to before me this 30th day of July, 2019.

Abbygail Mcfadden
Notary Public

My Commission Expires:

April 10, 2021



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 31st day of July 2019, to the following:

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