

IV.

The interests of DOD/FEA cannot be adequately represented or protected by any other party. The load factor, characteristics, and rate schedules upon which DOD/FEA installations and facilities obtain power make their usage distinct from other large customers.

V.

The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing this intervention. DOD/FEA's intervention and participation will not unreasonably broaden the issues, burden the record, unduly affect the rights of participating parties, or unreasonably delay the proceeding. DOD/FEA will present relevant and proper testimony and evidence bearing upon the issues involved in the above-captioned proceeding, which will be of value to the Commission in its determination of the issues.

VI.

All communications and pleadings for the above-captioned proceeding should be directed to:

Kevin K. LaChance
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Fort Riley, Kansas 66442
Tel: (785) 239-6175
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Office of The Judge Advocate General
9275 Gunston Road, (4th Floor – ELD)
Fort Belvoir, Virginia 22060-5546
Tel: (619) 302-9642 (mobile)
Email: john.j.mcnutt.civ@army.mil

WHEREFORE, DOD/FEA petitions the Commission for leave to intervene in the captioned proceeding as a party with full rights to participate in the proceeding, including the right to discovery, to examine witnesses, to file testimony and briefs, and to be heard at oral argument.

Respectfully submitted,



Kevin K. LaChance
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Administrative & Civil Law Division
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Email: kevin.k.lachance.civ@army.mil
Kansas State Bar No. 15058

/s/ John J. McNutt


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Tel: (619) 302-9642 (mobile)

Dated: April 7, 2022

VERIFICATION

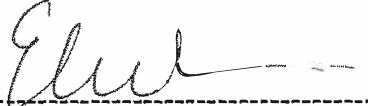
STATE OF KANSAS)
 Gray)
COUNTY OF RILEY)

Kevin K. LaChance, being duly sworn upon his oath, deposes and states that he is the Attorney for the United States Department of Defense, that he has read and is familiar with the foregoing *Petition to Intervene on behalf of the United States Department of Defense and all other Federal Executive Agencies*, and the statements therein are true to the best of his knowledge, information, and belief.



Kevin K. LaChance

SUBSCRIBED AND SWORN to before me this 7 day of April, 2022



Notary Public

My appointment expires: 30NW23



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was filed with the Kansas Corporation Commission and sent to the following parties of record by electronic mail.

Respectfully submitted,



Kevin K. LaChance
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Administrative & Civil Law Division
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Kansas State Bar No. 15058

Dated: April 7, 2022

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