

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

In the Matter of the Application of Southern)
Pioneer Electric Company for Approval to)
Make Certain Changes in its Charges for) Docket No. 20-SPEE-169-RTS
Electric Service.)

PETITION TO INTERVENE

COMES NOW, the Western Kansas Industrial Electric Consumers (“WKIEC”) and moves the Corporation Commission of the State of Kansas (“Commission”) for an Order permitting it to intervene in the above-captioned matter. In support of its Petition, WKIEC alleges and states as follows:

1. WKIEC is a voluntary association of Western Kansas Industrial Electric Consumers which represents the interests of those consumers in utility proceedings. Air Products and Chemicals, Inc. is a member of WKIEC and a customer/member of Southern Pioneer. Southern Pioneer is the distribution cooperative that provides Air Products and Chemicals, Inc. with electric service.

2. On October 10, 2019, Southern Pioneer filed its Application seeking to make certain changes in its rates for electric service.

3. Air Products and Chemicals, Inc., a member of the Western Kansas Industrial Electric Consumers Group, is a customer of Southern Pioneer takes service and is supplied with electricity by Southern Pioneer which is a Kansas Corporation, and a not-for-profit utility with its principal place of business in Ulysses, Kansas, with distribution and customer service offices located in Liberal and Medicine Lodge, Kansas.

4. On February 6, 2020, the Commission issued an Order Approving a Joint Motion to Revise Procedural Schedule. WKIEC and its member, Air Products and Chemicals, Inc., as a large industrial customer and member of Southern Pioneer, it will be affected by the Commission's decision in this matter and no other party in this docket will represent the interests of WKIEC's member, Air Products and Chemicals, Inc., in this proceeding.

5. WKIEC believes that its representation of one (1) of its members is in the interests of the public good and consistent with the State of Kansas's policy to encourage industrial service and development in the State of Kansas. No other party will represent the interests of WKIEC, or large industrial customers and its right to intervene should be allowed fully, including discovery and full participation in these proceedings including the settlement process, as positions of the parties may change and the affected WKIEC member needs to be an integral part of that process.

6. As a large industrial customer, its right to intervene and conduct discovery to assure that their rights and economic interests are protected is appropriate in this proceeding.

7. Granting this intervention will not delay the proceedings and will promote the interests of a fair and complete hearing and record.

WHEREFORE, WKIEC, on behalf of its individual member, Air Products and Chemicals, Inc., respectfully requests that the Commission grant the Petition to Intervene with full discovery rights and to participate fully in these proceeding.

Respectfully submitted,

CURTIS M. IRBY, SCID#: 07274

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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

I, Curtis M. Irby, of lawful age, being first duly sworn on his oath deposes and states that he is the attorney for the above named Petitioner; that he read the above and foregoing Petition to Intervene; and upon information and belief, states that the matters set forth herein are true and correct.

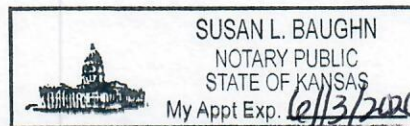
CURTIS M. IRBY

SUBSCRIBED AND SWORN to before me on this 11th day of February, 2020.

Notary Public

My Appointment Expires:

June 13, 2020



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via electronic mail or U.S. Mail on this 11th day of February, 2020 to:

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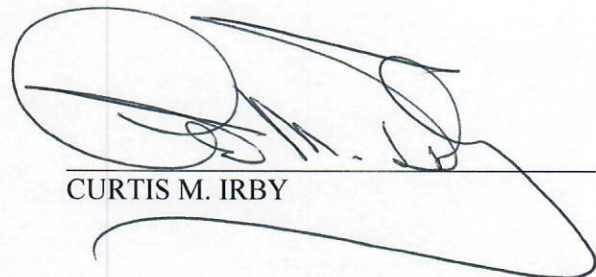
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