

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Joint Application of Sunflower )  
Electric Power Corporation, The Victory Electric )  
Cooperative Association, Inc., and Western ) Docket No. 26-SEPE-050-TAR  
Cooperative Electric Association, Inc., for Approval )  
of Continuation of 34.5kV Formula-Based Rates. )

**PETITION OF KANSAS ELECTRIC POWER**  
**COOPERATIVE, INC. TO INTERVENE**

COMES NOW Kansas Electric Power Cooperative, Inc. (“KEPCo”) and, pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, respectfully petitions the State Corporation Commission of the State of Kansas (“Commission”) for an order permitting it to intervene in the above-captioned docket. In support of its petition, KEPCo states as follows:

1. KEPCo is a corporation duly organized and existing under the laws of the state of Kansas, with its registered office and principal place of business at 600 SW Corporate View, Topeka, Kansas, 66615.

2. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 17 member distribution cooperatives (“Members”) in the state of Kansas pursuant to all-requirements wholesale electric power agreements. KEPCo’s Members serve approximately 75,000 retail meters in the eastern two-thirds of Kansas, which equates to nearly 200,000 rural Kansans.

3. On August 11, 2025, Sunflower Electric Power Corporation (“Sunflower”), The Victory Electric Cooperative Association, Inc. (“Victory”), and Western Cooperative Electric Association, Inc. (“Western”) (collectively, “Joint Applicants”) jointly filed an application seeking approval for the “[c]ontinuation of Victory’s and Western’s respective individual 34.5kV Formula-Based Rates (“34.5kV FBR(s)”), as originally approved in Docket No. 16-MKEE-023-TAR (“023 Docket”), and approved for renewal in Docket No. 21-SEPE-049-TAR (“21-049 Docket”), without any substantive changes.” Joint Application at p. 1.

4. KEPCo takes service from Victory's and Western's 34.5kV facilities pursuant to their respective Local Access Distribution Service ("LADS") tariffs. Any change to the 34.5kV FBRs, whether or not substantive, will necessarily impact KEPCo. KEPCo seeks to intervene in the docket in order to review the filing and determine the impact of Victory's and Western's continued use of their respective FBR mechanisms and other changes proposed by the Joint Applicants on KEPCo in order to protect its interests.

5. For these reasons, KEPCo has a direct and substantial interest in the issues to be addressed in this docket and such interest cannot be adequately represented by any other party. Further, KEPCo may or will be substantially affected by any Commission order or activity in this proceeding. K.A.R. 82-1-225(a)(2). Finally, the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing KEPCo to intervene. K.A.R. 82-1-225(a)(3).

6. Because KEPCo will or may be bound by any Commission order or activity in this proceeding and may be adversely affected thereby, and because KEPCo's interest herein may not be adequately represented by any other party, KEPCo respectfully requests its petition to intervene be granted without limitation.

7. In addition to the undersigned counsel, service of all pleadings, testimony, briefs, orders, correspondence, and other communication relating to this docket should be sent to the following named individual:

Rebecca Fowler  
Director, Regulatory Affairs  
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WHEREFORE, for the above and foregoing reasons, KEPCo respectfully requests that the Commission grant its Petition to Intervene without limitation and for such other relief as the Commission deems just and proper.

Respectfully submitted,

*/s/ Susan B. Cunningham*

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*Attorney for Kansas Electric Power  
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**VERIFICATION**  
**(K.S.A. 53-601)**

STATE OF KANSAS            )  
  ) ss.  
COUNTY OF SHAWNEE    )

I, Susan B. Cunningham, verify under penalty of perjury that I have caused the foregoing Petition of Kansas Electric Power Cooperative, Inc. to Intervene to be prepared on behalf of Kansas Electric Power Cooperative, Inc.; that I have read and reviewed the Petition; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

*/s/ Susan B. Cunningham*

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Susan B. Cunningham

Executed on this 18<sup>th</sup> day of August 2025.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Petition of Kansas Electric Power Cooperative, Inc. to Intervene was electronically served on this 18<sup>th</sup> day of August, 2025, to the following named persons appearing on the Commission's service list:

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/s/ Susan B. Cunningham

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