

BEFORE THE STATE CORPORATION COMMISSION OF
THE STATE OF KANSAS

In the Matter of a General Investigation)
Regarding Whether Electric Utilities Should)
be Considered an "Operator" of Private)
Underground Lines Under the Provisions of)
the Kansas Underground Utility Damage)
Prevention Act.

Docket No. 17-GIME-565-GIV

PETITION TO INTERVENE

Kansas Electric Cooperatives, Inc. ("KEC") hereby petitions the State Corporation Commission of the State of Kansas ("Commission") for an Order allowing it to intervene herein pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support of its Petition, KEC states as follows:

1. KEC, Inc., is the statewide service organization providing services for the rural electric cooperatives in Kansas. Formed in 1941 and headquartered in Topeka, KEC represents the interests of and provides services and programs to the electric co-ops that serve in Kansas. Services include lobbying for cooperative interests, rate and tax expertise, safety programming, communications and some engineering services. Individual cooperatives may also choose to submit comments to this docket. KEC's principal place of business is 7332 SW 21st Street, P.O. Box4267, Topeka KS 66604-0267.

2. On July 27, 2017, the Commission opened the above captioned docket. Pursuant to paragraph 5 of the Order Opening General Investigation, the Commission states it wishes to encourage broad participation from utilities that operate underground facilities.

3. KEC's members operate electric utility services within the State of Kansas,

which may include and / or interact with other utilities, businesses, or groups operating underground utility facilities subject to the Kansas Underground Utility Damage Prevention Act ("KUUDPA"). KEC's members could be affected by any order issued in this docket to the extent the Commission's findings and conclusions in the instant docket could apply to electric cooperatives. As the statewide representative for the collective members, KEC is a proper participant in this proceeding.

4. KEC's interests herein are not adequately represented by the existing parties.

5. Granting intervention and party status to KEC will not impede the progress of this docket.

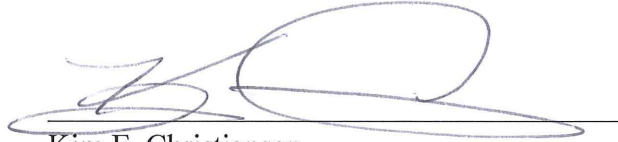
6. All communications and correspondence to KEC, including service of all notices and orders of the Commission herein are requested, in addition to the attorney named below, to be sent to the following named individuals:

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WHEREFORE, Kansas Electric Cooperatives, Inc. prays the Commission enter an Order permitting its intervention herein and for such other relief as the Commission may deem just and proper.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'K. Christiansen', is written over a horizontal line.

Kim E. Christiansen

Supreme Court Id No. 16014

Attorney for Kansas Electric Cooperatives, Inc.

7332 SW 21st Street

P.O. Box 4267

Topeka, Ks 66604-0267

kchristiansen@kec.org

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF SHAWNEE)

ss:

Kim Christiansen, of lawful age, being first duly sworn on oath, states that she is attorney for Kansas Electric Cooperatives, Inc.; that she has read the above and foregoing Petition to Intervene, and the statements contained therein are true.



Kim E. Christiansen

SUBSCRIBED AND SWORN to before me this 30th day of August, 2017.



Notary Public

Appointment/Commission Expires: 4-12-18

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via U.S. Mail, postage prepaid, hand-delivery, or electronically, this 30 th day of August, 2017, addressed to:

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