

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

In the Matter of the Joint Application of)
Sunflower Electric Power Corporation,)
and Wheatland Electric Cooperative, Inc.,) Docket No. 25-SEPE-309-TAR
for Approval of a Local Access Charge and)
a 34.5kV Formula-Based Rate.)

PETITION TO INTERVENE BY KPP ENERGY

COMES NOW, KPP Energy, A Municipal Energy Agency (“KPP”) and moves the Corporation Commission of the State of Kansas (“Commission”) for an order pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 permitting it to intervene in the above-captioned proceeding. In support of its Petition, KPP alleges and states as follows:

1. KPP is a municipal energy agency formed under K.S.A. 12-885, *et seq.*
2. KPP provides wholesale capacity, energy and transmission services to its members, who have all signed KPP’s Amended Operating Agreement. Currently, KPP serves 24 Kansas municipal electric utilities. KPP’s members are located in the Westar Energy transmission zone, the Sunflower Electric Power Corporation zone, and in the Midwest Energy zone.
3. On February 5, 2024, Sunflower Electric Power Corporation (“Sunflower”) and Wheatland Electric Cooperative, Inc. (“Wheatland”) (collectively, “Joint Applicants”) filed an application with the Kansas Corporation Commission for approval for a change in Wheatland’s local access charge rate (“LAC”) that is set forth in its local access delivery service (“LADS”) tariff for its Eastern Division, and a Formula Based Rate (“FBR”) for Wheatland’s 34.5kV and lower wholesale subtransmission facilities for its Eastern Division. KPP’s member city, the City of Attica, Kansas, is specifically impacted by this proceeding.

4. Wheatland is operating, and Sunflower is administering, 34.5 kV sub-transmission facilities that provide service to both retail customers and wholesale local access customers. The wholesale local access customers' combined load ration share of the total 34.5 kV system revenue requirement for these facilities is recovered through the LADS tariff, where the retail customers' local ratio share of the total 34.5 kV system revenue requirement is bundled and recovered through the composite retail rate found in Wheatland's respective retail rate schedules.

5. As indicated in the Application, Wheatland is seeking a rate change from \$1.99 per kW to \$2.95 per kW, and for a FBR for future annual filing.

6. KPP is one of Wheatland's wholesale local access customers, and, thus, is required to pay the LADS rates under Wheatland's 34.5 kV FBR Plans. Any change to Wheatland's 34.5 kV FBRs or loss factors will impact KPP and its members.

7. KPP and, ultimately, its members will or may be bound by any Commission Order or activity in this proceeding, and KPP and its members may be adversely affected thereby.

8. KPP's interests herein are not adequately represented by any other party, and its intervention will not impair the orderly and prompt conduct of the proceedings.

9. All communication and correspondence to KPP, including service of all Notices and Orders of this Commission herein, are requested to be sent to the following named individuals:

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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Kacey S. Mayes, of lawful age, being first duly Sworn upon my oath, state that I am one of the attorneys for KPP Energy, A Municipal Energy Agency; that I have read the above Petition; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.

Kacey S. Mayes

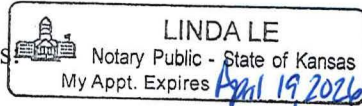
Kacey S. Mayes, #28224

SUBSCRIBED AND SWORN to before me this 10 day of February, 2025.

Linda Le

Notary Public

My Appointment Expires



CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2025 the *Petition to Intervene by KPP Energy* was served via electronic mail to:

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/s/ Kacey S. Mayes

Kacey S. Mayes, #28224