

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

In the Matter of the Application of Western       )  
Cooperative Electric Association, Inc. Seeking    )  
Commission Approval to Update its Local        ) Docket No. 19-WSTE-443-TAR  
Access Delivery Service Tariff Pursuant to       )  
The 34.5kV Formula Based Rate Plan            )  
Approved in Docket No. 16-MKEE-023-TAR.       )

**PETITION TO INTERVENE**

COMES NOW the Kansas Municipal Energy Agency (“KMEA”) and petitions the Corporation Commission of the State of Kansas (“Commission”) for intervention in the above-captioned case pursuant to K.S.A. 77-521. In support of its petition, KMEA states and alleges as follows:

1. On April 26, 2019, Western Cooperative Electric Association, Inc. (“Western”) filed with the Commission an application for approval to update its Local Access Delivery Service (“LADS”) tariff. Western proposed to decrease its LADS demand charge assessed on the wholesale users of its 34.5kV system from \$1.73 per kW to \$1.13 per kW in accordance with the 34.5kV Formula Based Rate plan approved in Docket 16-MKEE-023-TAR.

2. KMEA is a municipal energy agency created pursuant to Kansas law (K.S.A. 12-855 *et seq.*) and authorized by Kansas law to plan, finance, and construct projects for the purchase, sale, generation, and transmission of electricity for the purpose of securing an adequate, economical, and reliable supply of energy for its 77 municipal members. Its business address is 6300 West 95<sup>th</sup> Street, Overland Park, Kansas 66212.

3. KMEA has members who are served by Western’s facilities, and those members, and their customers, will be affected by any Commission order or finding in this matter.

4. KMEA's interest in this proceeding is not adequately represented by any other party.

5. All communications and correspondence to KMEA, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

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WHEREFORE, KMEA respectfully requests the Commission enter an Order allowing it to intervene in this proceeding and for all other relief which the Commission deems just and proper.

By: /s/ Terry M. Jarrett  
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COUNSEL TO KMEA

\* Ms. Starnes is listed as counsel subject to Commission action on her Motion for Admission Pro Hac Vice, which is being filed simultaneously herewith.

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 30th day of May, 2019, addressed to:

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