

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Investigation into)
Everygy Kansas Metro and Everygy Kansas)
Central Regarding the February 2021 Winter) Docket No. 21-EKME-329-GIE
Weather Events, as Contemplated by)
Docket No. 21-GIMX-303-MIS

PETITION

COMES NOW, Unified School District #259 Sedgwick County, Kansas (hereinafter “USD 259”) and respectfully petitions the Corporation Commission of the State of Kansas (the “Commission”) for an order permitting its intervention and full participation in the captioned proceeding. In support of its Petition, USD 259 states:

I. Background,

1. On March 9, 2021, the Commission issued an Order adopting the Staff’s Report and Recommendation to open Company-Specific Investigations in Docket No. 21-GIMS-303-MIS. As a result, several utility-specific dockets were opened to investigate the impact of winter storm URI on each such utilities specific circumstances in responding this severe winter storm.

II. Petition to Intervene

2. USD 259 comprises the Wichita Public School system and is the largest public school system and district in the state of Kansas, serving approximately 50,000 students. USD 259 is part of the public schools rate class and is the largest school district in the state of Kansas.

3. USD 259 is a significant user of electricity supplied principally by Everygy Kansas Central (hereinafter “Everygy”) having consumed approximately 80,649,532 kWh of electricity supplied at a cost of \$7,931,867.00 in 2019 and in 2020 approximately 60,279,392 kWh at a cost of \$6,052,000.

4. Evergy filed its Compliance Report regarding costs incurred during the winter weather event on or about July 2, 2021, in which it has indicated that it seeks to recover \$153.2M from Evergy Kansas Central customers over a two year period

5. USD 259 is dependent primarily upon tax revenues to finance its mandated purpose of providing a quality education for Kansas students. The subject of the captioned docket could significantly impact USD 259 in how it deals with financing and structuring its budget in response to any order coming out of this docket. Thus USD 259 has a vital interest in the subject of this docket and orders issued therein.

6. USD 259 requests the right to participate in all aspects of this Docket. The interests of justice will be served and the orderly and prompt conduct of these proceedings will not be impaired by allowing the intervention of USD 259 to participate therein.

7. In addition to the undersigned counsel, please include the following USD 259 representatives with all electronic notices, pleadings, and correspondence regarding this Application:

Dan Lawrence
General Counsel — USD 259
903 South Edgemoor, Room 113
Wichita, KS 67218
dlawrence@usd259.net

WHEREFORE, USD 259 respectfully requests that the Commission enter an order granting it full participation in the captioned proceedings.

Respectfully submitted,

TRIPLETT WOOLF GARRETSON, LLC

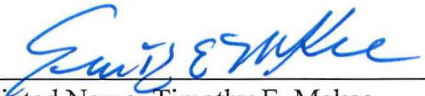
By 

Timothy E. McKee, #07135
Attorneys for USD 259

VERIFICATION

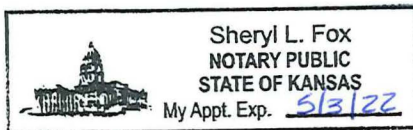
STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

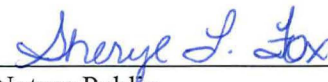
I, Timothy E. McKee, of lawful age, being first duly sworn, upon oath states: I am an attorney representing USD 259, and I have read the above Petition to Intervene and know the contents and know that the statements made therein are true and correct, to the best of my knowledge and belief.



Printed Name: Timothy E. McKee
Date: August 19, 2021

SUBSCRIBED AND SWORN to before me on this 19th day of August, 2021.





Notary Public

My Commission Expires: 5/3/22

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 19th day of August, 2021, to the following:

Joseph R. Astrab, Attorney
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Rd
Topeka, KS 66604
j.astrab@curb.kansas.gov

Robert J. Hack Lead Regulatory Counsel
Evergy Metro, Inc d/b/a Evergy Kansas Metro
One Kansas City Place
1200 Main S., 19th Floor
Kansas City, KS 64105
Rob.Hack@evergy.com

Todd E. Love, Attorney
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Rd
Topeka, KS 66604
t.love@curb.kansas.gov

Cole Bailey, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604
c.bailey@kcc.ks.gov

David W. Nickel, Consumer Counsel
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Rd
Topeka, KS 66604
d.nickel@curb.kansas.gov

Brian G. Fedotin, General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604
b.fedotin@kcc.ks.gov

Shonda Rabb
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Rd
Topeka, KS 66604
s.rabb@curb.kansas.gov

Terri Pemberton, Chief Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604
t.pemberton@kcc.ks.gov

Della Smith
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Rd
Topeka, KS 66604
d.smith@curb.kansas.gov

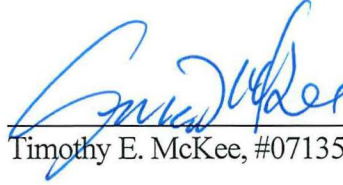
Susan B. Cunningham, SVP, Regulatory and
Government Affairs, General Counsel
Kansas Electric Power CO-OP, Inc.
600 SW Corporate View
P.O. Box 4877
Topeka, KS 66604-0877
scunningham@kepco.org

Cathryn J. Dinges, Corporate Counsel
Evergy Kansas Central, Inc
818 S. Kansas Ave.
P.O. Box 889
Topeka, KS 66601-0889
Cathy.Dinges@evergy.com

Mark Doljac, Dir Rates and Regulation
Kansas Electric Power CO-OP, Inc.
600 SW Corporate View
P.O. Box 4877
Topeka, KS 66604-0877
mdoljac@kepco.org

Larry Wilkus, Director, Retail Rates
Every Kansas Central, Inc.,
Floor #10
818 S. Kansas Ave.
Topeka, KS 66601-0889
larry.wilkus@evergy.com

Rebecca Fowler, Manager, Regulatory Affairs
Kansas Electric Power CO-OP, Inc.
600 SW Corporate View
P.O. Box 4877
Topeka, KS 66604-0877
rfowler@kepco.org



Timothy E. McKee, #07135