

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

BEFORE COMMISSIONERS: Dwight Keen, Chair
Shari Feist Albrecht, Commissioner
Jay Scott Emler, Commissioner

In The Matter of Westar Energy, Inc. and)
Kansas Gas and Electric Company seeking)
Commission Approval to Implement) Docket No. 19-WSEE-327-TAR
Changes in their Transmission Delivery)
Charges Rate Schedules.)

PETITION TO INTERVENE

COMES NOW, Unified School District #259 Sedgwick County, Kansas (hereinafter “USD 259”) and respectfully moves 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:

1. USD 259 comprises the Wichita Public School system and is the largest public school system and district in the state of Kansas, serving approximately 51,000 students.

2. On February 15, 2019, Westar Energy, Inc. and Kansas Gas and Electric Company (hereinafter “Westar”) filed a report with the Commission to make certain changes in their Transmission Delivery Charge (hereafter “TDC”).

3. USD 259 takes all of its electric service from Westar except for its new Southeast High School. USD 259 maintains 106 buildings, approximately 140 electric meters, and consumed approximately 93,300,000 kilowatt hours of electricity supplied by Westar at a cost of \$7,769,832.00 in the last fiscal year.

4. Although it appears from Westar’s filing that the total TDC, for which Westar requests approval of in this docket will decrease moderately the shift between rate classes is particularly dramatic.

5. Although the calculation of the TDC and its allocation to various rate classes is extremely complicated and, apparently, now involves the use of a 12 coincidental peak formula versus a 4-coincidental peak formula used in the past, the resulting increase in Westar's proposal TDC for public schools and universities of approximately is an 85% increase over the current charge.

6. An increase of 85% to public schools constitutes "rate shock" and flies in the face of the Commission's traditional approach to gradualism with respect to introduction of new significantly increased rates for electric service.

4. Public schools are classified as their own rate class. USD 259 is part of the public schools rate class and is the largest school district in the state of Kansas. No other customer taking electric service under the public schools rate class has intervened or sought to intervene in this case to date. Therefore, no other party can adequately represent the unique interests of USD 259 in these proceedings.

5. The future workforce of the state of Kansas will be filled by many of today's 51,000 students in the Wichita Public Schools. Students today are tomorrow's workers, customers, and owners of local business. The quality of education provided to Wichita Public School students is crucial to future economic vitality in Wichita and the state of Kansas. It is one of the missions of the Wichita Public Schools to produce students that meet workforce needs of today's and tomorrow's world. Any electric rates above cost of service divert increasingly scarce and limited public school funds away from the classroom and hinder these efforts. The electric rates paid and services received by USD 259 will be substantially impacted by any order entered by the Commission herein. USD 259 requests permission to intervene in this docket and participate fully.

6. USD 259 requests the right to conduct discovery, present witnesses, cross-examine witnesses, and 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 fully participate therein.

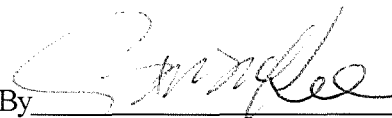
7. In addition to the undersigned counsel, please include the following USD 259 representatives with all electronic notices, pleadings, and correspondence regarding this Application:

Tom Powell
General Counsel — USD 259
201 N. Water
Wichita, KS 67202
tpowell@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
Amy Fellows Cline, #19995
Attorneys for USD 259

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Thomas R. Powell, of lawful age, being first duly sworn, upon oath states: He is the Superintendent of Schools for USD 259, and that he has read the above Petition to Intervene knows the contents and knows that the statements made therein are true and correct, to the best of his knowledge and belief.

Thomas R. Powell

Print Name: THOMAS R. POWELL

SUBSCRIBED AND SWORN to before me this 6th day of March, 2019.



Terril Brooks
Notary Public

My Commission Expires:

4-17-19

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 6th day of March, 2019, to the following:

PHOENIX ANSHUTZ
LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
p.anshutz@kcc.ks.gov

ROBERT VINCENT
LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
r.vincent@kcc.ks.gov

DAVID W. NICKEL
CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD.
TOPEKA, KS 66604
d.nickel@curb.kansas.gov

CATHRYN J. DINGES,
SENIOR CORPORATE COUNSEL
WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
cathy.dinges@westarenergy.com

RONALD A. KLOTE
DIRECTOR REGULATORY AFFAIRS
REGULATORY AFFAIRS
WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
ronald.klote@kcpl.com



Timothy E. McKee, #7135