BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In The Matter of the Evergy Kansas Central,)	
Inc. and Evergy Kansas South, Inc. updated)	Docket No. 22-EKCE-407-TAR
Transmission Delivery Charge Tariff.)	

APPLICATION FOR INTERVENTION ON BEHALF OF THE GOODYEAR TIRE & RUBBER COMPANY (GOODYEAR)

COMES NOW The Goodyear Tire & Rubber Company (Goodyear) and respectfully files this Application for Intervention in the above-referenced matter before the State Corporation Commission of the state of Kansas ("Commission" or "KCC").

- 1. On February 17, 2022, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (together as "Evergy Kansas Central") ("Evergy") filed with the Kansas Corporation Commission an updated Transmission Delivery Charge ("TDC") tariff in accordance with K.S.A. 66-1237.
 - 2. Goodyear is a direct retail purchaser of electric energy from Evergy.
- 3. Goodyear will participate in this docket through the Kansas Industrial Consumers Group, Inc. ("KIC"). On numerous occasions in the past, the Commission has granted intervenor status to KIC and Goodyear in matters related to Evergy. KIC filed an Application for Intervention in this Docket on March 14, 2022.
- 4. Goodyear will be directly affected by any amounts permitted to be passed through to retail electric customers of Evergy, by any KCC Order in this case.

- 5. No parties to this proceeding represent the interests of Goodyear and KIC and participation by these companies in this entitled docket may aid the Commission in consideration of any Order issued by the KCC herein.
- 7. Goodyear and KIC respectfully requests to be granted Intervenor status herein with full rights of participation in this Docket.

Respectfully submitted,

James P. Zakoura, #07644

Connor A. Thompson, #28667

James D. Zakowa

SMITHYMAN & ZAKOURA, CHARTERED

750 Commerce Plaza II Bldg.

7400 W. 110th St.

Overland Park, KS 66210-2362

Telephone: 913-661-9800
Facsimile: 913-661-9863
Email: jim@smizak-law.com
connor@smizak-law.com

Attorneys for Kansas Industrial Consumers Group and Participating Members

VERIFICATION

STATE OF KANSAS)
) ss
COUNTY OF JOHNSON)

James P. Zakoura, being duly sworn upon his oath, deposes and states that he is the Attorney for the Kansas Industrial Consumers Group, Inc., that he has read and is familiar with the foregoing *Petition to Intervene on behalf of Kansas Industrial Consumers Group, Inc. (KIC), and Goodyear*, and the statements therein are true to the best of his knowledge, information, and belief.

James P. Zakoura

SUBSCRIBED AND SWORN to before me this 16th day of March, 2022.

Notary Public

My Appointment Expires:

NOTARY PUBLIC - State of Kansas
DIANE M. WALSH
My Appt. Expires August 31, 2022

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of March 2022, the foregoing *Petition to Intervene on behalf of Kansas Industrial Consumers Group, Inc. (KIC), and The Goodyear Tire & Rubber Company (Goodyear)* was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

LOCEDILD ACTUAD ATTORNEY	TODD E LOVE ATTODNEY
JOSEPH R. ASTRAB, ATTORNEY	TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD	CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD	1500 SW ARROWHEAD RD
TOPEKA, KS 66604	TOPEKA, KS 66604
j.astrab@curb.kansas.gov	t.love@curb.kansas.gov
DAVID W. NICKEL, CONSUMER COUNSEL	SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD	CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD	1500 SW ARROWHEAD RD
TOPEKA, KS 66604	TOPEKA, KS 66604
d.nickel@curb.kansas.gov	s.rabb@curb.kansas.gov
DELLA SMITH	ROBIN ALLACHER, REGULTORY ANALYST
CITIZENS' UTILITY RATEPAYER BOARD	EVERGY KANSAS CENTRAL, INC.
1500 SW ARROWHEAD RD	818 S KANSAS AVE
TOPEKA, KS 66604	PO BOX 889
d.smith@curb.kansas.gov	TOPEKA, KS 66601-0889
distillation of the state of th	robin.allacher@evergy.com
	100111tttttttttttttttttttttttttttttttt
RONALD A. KLOTE, DIRECTOR,	LISA STARKEBAUM, MANAGER,
REGULATORY AFFAIRS	REGULATORY AFFAIRS
EVERGY METRO, INC. D/B/A EVERGY	EVERGY METROL, INC. D/B/A EVERGY
KANSAS METRO	KANSAS METRO
ONE KANSAS CITY PLACE	ONE KANSAS CITY PLACE
1200 MAIN, 19TH FLOOR	1200 MAIN, 19TH FLOOR
KANSAS CITY, MO 64105	KANSAS CITY, MO 64105
	lisa.starkebaum@evergy.com
ronald.klote@kcpl.com	iisa.starkevaurii(@evergy.com
ronald.klote@evergy.com	

TERRI PEMBERTON, CHIEF LITIGATION	BRIAN G. FEDOTIN, GENERAL COUNSEL
COUNSEL	KANSAS CORPORATION COMMISSION
KANSAS CORPORATION COMMISSION	1500 SW ARROWHEAD RD
1500 SW ARROWHEAD RD	TOPEKA, KS 66604
TOPEKA, KS 66604	b.fedotin@kcc.ks.gov
t.pemberton@kcc.ks.gov	
JARED JEVONS, LITIGATION ATTORNEY	
KANSAS CORPORATION COMMISSION	
1500 SW ARROWHEAD RD	
TOPEKA, KS 66604	
j.jevons@kcc.ks.gov	