## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the General Investigation	)	
to Examine Issues Surrounding Rate Design	)	Docket No. 16-GIME-403-GIE
for Distributed Generation Customers	)	

## PETITION TO INTERVENE OF UNITED WIND

COMES NOW United Wind, Inc. ("United Wind"), by and through its attorney, Jason L. Kaplan, and petitions the State Corporation Commission of the State of Kansas (the "Commission") pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 for permission to intervene in this proceeding with rights of full participation. In support of its Petition, United Wind states as follows:

- 1. On March 11, 2016, Commission Staff ("Staff") filed a motion requesting a Commission order opening a general investigation to examine various issues surrounding rate design for distributed generation customers. Staff's Report and Recommendation ("R&R") detailed Staff's summary and concerns regarding the issues presented by this general investigation, which was in part based off of comments from several utilities.
- 2. Pursuant to K.S.A 77-521(a)(2)-(3) and K.A.R. 82-1-225(2)-(3), the Commission shall grant a petition for intervention if the petition states facts demonstrating that the petitioner's legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding, and the interest of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.
- 3. United Wind is a Delaware corporation with its primary business address at 20 Jay Street, Suite 928, Brooklyn, NY 11201.
- 4. The purpose of this docket is to research and evaluate issues that directly affect United Wind and its customers.
- 5. United Wind is a distributed wind energy developer, responsible for the siting, permitting, installation, and operation and maintenance of distributed wind energy systems, focused on serving customers on rural and agricultural properties. Specifically, United Wind's customers include dairy farmers, feed lots, and food processing operators, each a distributed generation customer.

6. United Wind is active in the State of Kansas, having signed multiple Kansas businesses to

its Windlease product, enabling these customers to lease a distributed wind energy system.

Through the Windlease, United Wind's customers are enabled to produce renewable and

sustainable energy which will be used to off-set its on-site energy usage, without having any

upfront capital expenditures. United Wind is actively engaging customers in the State of Kansas

as well as collaborating with the state's utilities and rural electric cooperatives for purposes of

interconnection and net-metering.

7. United Wind can provide valuable information specifically regarding distributed wind

energy and the costs and benefits of enabling the connection of this technology to the state's

distribution networks. United Wind plans to invest heavily in Kansas, in terms of both operations

(sales, project development, operations and maintenance teams) and as well as equipment (cranes,

concrete, and wind energy systems). Distributed generation rate and design are undeniably tied to

United Wind's ability to develop and deploy its distributed wind energy systems in a sustainable

and economically effective manner. United Wind's interests cannot be represented by any other

party in this docket. The interests of justice weigh in favor of granting United Wind's Petition to

Intervene because of its specific interests on these issues and its expertise in distributed wind

energy. If the Commission grants the instant petition, the proceeding will not be delayed or

disorderly.

WHEREFORE, United Wind respectfully requests that the Commission grant its Petition to

Intervene in this docket, and that an intervenor it be granted full rights of participation including

the right to relevant discovery, the right to present and sponsor witnesses, the right to present

evidence, the right to cross-examine witnesses, the right to file briefs, and the right to offer oral

argument and participate in hearings.

Respectfully Submitted, United Wind, Petitioner

Prepared By:

/s/ Jason Kaplan, Esq.

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