2011.09.19 14:33:21 Kansas Corporation Commission /S/ Patrice Petersen-Klein

BEFORE THE STATE CORPO OF THE STATE C		MISSION	Received on	
n The Matter of the 2011 Wolf Creek Decommissioning Cost Study as Provided by Wolf Creek Nuclear Operating Corporation on August 31, 2011 in Accordance with the Commission's Order in Docket Number 163,561-U	) ) ) ) Dock )		SEP 1 9 2011  by  orporation Commission VGNEnsh26-GIE	on E
n December 0, 1002	)			

## PETITION TO INTERVENE OF THE KANSAS ELECTRIC POWER COOPERATIVE, INC.

COMES NOW Kansas Electric Power Cooperative, Inc. (KEPCo) and moves the Corporation Commission of the State of Kansas ("Commission") for an order permitting it to intervene in the above-captioned matter. In support of its Petition, applicant states:

- On August 31, 2011, in accordance with the Commission's
   December 9, 1992 Order in Docket No. 164-561-U (directing the filing of a Wolf Creek Decommissioning Cost Study Update every three years after September 1, 1993), Wolf Creek Nuclear Operating Corporation (WCNOC) filed on behalf of Westar, Kansas City Power & Light Company and KEPCo the original and seven copies of the 2011 Decommissioning Cost Analysis for the Wolf Creek Generating Station.
- 2. KEPCo is a non-profit generation and transmission cooperative with its principal place of business in Topeka, Kansas. KEPCo has 19 rural electric cooperative members, which together distribute electric power to more than

300,000 rural Kansans.<sup>1</sup> KEPCo is responsible for supplying the full power and energy requirements of its members, and this power is partially supplied by Wolf Creek Generating Station.

3. As a co-owner of the Wolf Creek Generation Station, KEPCo has an interest in the docket which cannot be represented by any other party.

WHEREFORE, KEPCo respectfully requests that the Commission issue an order allowing it to intervene in this proceeding and for such further and other relief as may be appropriate.

Respectfully submitted

. Michael Peters, No. 7457

Kansas Electric Power Cooperative, Inc.

P.O. Box 4877

Topeka, KS 66604-0877 (785) 273-7010 (Main) (785) 271-4888 (Fax)

<sup>&</sup>lt;sup>1</sup> KEPCo's 19 distribution cooperative member systems are: Ark Valley Electric Cooperative Association, Inc. (Hutchison, Kansas); Bluestem Electric Cooperative, Inc. (Wamego, Kansas); Brown-Atchison Electric Cooperative Association, Inc. (Horton, Kansas); Butler Rural Electric Cooperative Association, Inc. (El Dorado, Kansas); Caney Valley Electric Cooperative Association, Inc. (Cedar Vale, Kansas); CMS Electric Cooperative, Inc. (Meade, Kansas); DS&O Rural Electric Cooperative Association, Inc. (Solomon, Kansas); Flint Hills Rural Electric Cooperative Association, Inc. (Council Grove, Kansas); Heartland Rural Electric Cooperative, Inc. (Girard, Kansas); Leavenworth-Jefferson Electric Cooperative Association, Inc. (McLouth, Kansas); Lyon-Coffey Electric Cooperative, Inc. (Burlington, Kansas); Ninnescah Rural Electric Cooperative Association, Inc. (Pratt, Kansas); Prairie Land Electric Cooperative, Inc. (Norton, Kansas); Radiant Electric Cooperative, Inc. (Fredonia, Kansas); Rolling Hills Electric Cooperative, Inc. (Mankato, Kansas); Sedgwick County Electric Cooperative Association, Inc. (Cheney, Kansas); Sumner-Cowley Electric Cooperative Association, Inc. (Wellington, Kansas); Twin Valley Electric Cooperative, Inc. (Altamont, Kansas); and Victory Electric Cooperative Association, Inc. (Dodge City, Kansas).

## **VERIFICATION**

STATE OF KANSAS )	00.
COUNTY OF SHAWNEE )	SS:
J. Michael Peters, of	awful age, being first duly sworn upon oath states:
Cooperative, Inc. (KEPCo) in foregoing Petition to Interver	Il Counsel for the Kansas Electric Power this matter; that he has read and is familiar with the ne, and that he believes that the statements made to the best of his information, knowledge, and belief.
	J. Michael Peters
Subscribed and swor	n to before me this 15 <sup>th</sup> day of September, 2011.  Notary Public
My Appointment Expires:	RITA J. PETTY  NOTARY PUBLIC  STATE OF KANSAS  My App. Exp. 1115 2013

## CERTIFICATE OF SERVICE (12-WCNE-136-GIE)

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing was placed in the United States mail, postage prepaid, or electronic service this  $\frac{1944}{100}$  day of September, 2011, to the following:

Patrice Petersen-Klein, Exec Dir Kansas Corporation Commission 1500 SW Arrowhead Rd Topeka, KS 66604-4027

Denise M. Buffington, Corp Counsel Kansas City Power & Light Co One Kansas City Place 1200 Main St Kansas City, MO 64105

Heather A. Humphrey, Gen Counsel KCPL One Kansas City Place 1200 Main St Kansas City, MO 64105

Judy Jewsome, Asst Lit Counsel KCC 1500 SW Arrowhead Topeka, KS 66604-4027

Martin J. Bregman, Exec Dir, Law Westar Energy P O Box 889 Topeka, KS 66601-0889

Cathryn J. Dinges, Corp Counsel Westar Energy P O Box 889 Topeka, KS 66601-0889

Warren Wood Wolf Creek Nuclear Operating Corp P.O. Box 411 Burlington, KS 66839

Michael Peters