

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Annual Filing of Southern)
Pioneer Electric Company for Approval to)
Make Certain Changes to Its Charges for)
Electric Services, Pursuant to the Consolidated) Docket No. 21-SPEE-411-RTS
Formula Based Ratemaking Plan Approved in)
Docket No. 19-SPEE-240-MIS and)
Implementation of Rate Adjustment Pursuant)
To Docket No. 20-SPEE-169-RTS.)

PETITION TO INTERVENE

COMES NOW the Kansas Municipal Energy Agency (“KMEA”) and petitions the Corporation Commission of the State of Kansas (“Commission”) for intervention in the above-captioned case pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support of its petition, KMEA states and alleges as follows:

1. On May 3, 2021, Southern Pioneer Electric Company (“Southern Pioneer”) filed with the Commission an application pursuant to K.S.A. §66-117 and in accordance with the Order Approving Settlement of the State Corporation Commission of the State of Kansas (“Commission” or “KCC”) issued on August 11, 2020 in Docket No. 19-SPEE-240-MIS (“19-240 Order” and “19-240 Docket”), for its first annual rate adjustment under its Consolidated Formula Based Ratemaking Plan (“Consolidated FBR Plan”). The Application includes the annual adjustment to Southern Pioneer’s retail rates and its annual adjustment to both retail rates and wholesale Local Access Delivery Service (“LADS”) for services over Southern Pioneer’s 34.5kV sub-transmission system. Additionally, the Application includes the rate adjustments approved in the Commission’s July 14, 2020 Order issued in Southern Pioneer’s last general rate case in Docket No. 20-SPEE- 169-RTS (“20-169 Docket” and “20-169 Order”), including the re-basing of property taxes.

2. KMEA is a municipal energy agency created pursuant to Kansas law (K.S.A. 12-855 *et seq.*) and authorized by Kansas law to plan, finance, and construct projects for the purchase, sale, generation, and transmission of electricity for the purpose of securing an adequate, economical, and reliable supply of energy for its 81 municipal members. Its business address is 6300 West 95th Street, Overland Park, Kansas 66212.

3. KMEA has member cities Ashland and Meade who take service under Southern Pioneer's LADS tariff, and therefore those members, and their customers, will be affected by any Commission order or finding in this matter.

4. KMEA's interest in this proceeding is not adequately represented by any other party.

5. All communications and correspondence to KMEA, including service of all notices and orders of the Commission herein, are requested to be sent to the following named individuals:

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WHEREFORE, KMEA respectfully requests the Commission enter an Order allowing it to intervene in this proceeding and for all other relief which the Commission deems just and proper.

By: /s/ Terry M. Jarrett
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COUNSEL TO KMEA

* Ms. Starnes is listed as counsel subject to Commission action on her Motion for Admission Pro Hac Vice, which is being filed simultaneously herewith.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 6th day of May 2021, addressed to:

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