

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

In the Matter of the Application of Prairie)
Land Electric Cooperative, Inc. Seeking)
Commission Approval to Update its Local) Docket No. 20-PLCE-434-TAR
Access Delivery Service Tariff Pursuant to)
the 34.5kV Formula Based Rate Plan)
Approved in Docket No. 16-MKEE-023-TAR.)

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. In support of its petition, KMEA states and alleges as follows:

1. On April 27, 2020, Prairie Land Electric Cooperative, Inc. (“Prairie Land”) filed with the Commission an application for approval to update its Local Access Delivery Service (“LADS”) tariff. Prairie Land proposed to decrease its LADS demand charge assessed on the wholesale users of its 34.5kV system from \$2.88 per kW to \$2.66 per kW in accordance with the 34.5kV Formula Based Rate (“34.5kV FBR”) plan approved in Docket 16-MKEE-023-TAR.

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, specifically Cawker City, Glen Elder, Mankato, Osborne, Stockton, and Washington, who are served by Prairie Land’s facilities, 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:

Heather H. Starnes*
Counsel to KMEA
Healy Law Offices, LLC
12 Perdido Circle
Little Rock, AR 72211
(501) 516-0041
heather@healylawoffices.com

Terry M. Jarrett
Counsel to KMEA
Healy Law Offices, LLC
514 East High Street, Suite 22
Jefferson City, MO 65101
(573) 415-8379
terry@healylawoffices.com

Paul Mahlberg
General Manager
KMEA
6300 West 95th Street
Overland Park, KS 66212
(913) 660-0234
mahlberg@kmea.com

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
Terry M. Jarrett (#27782)
HEALY LAW OFFICES, LLC
514 East High Street, Suite 22
Jefferson City, MO 65101
573-415-8379
terry@healylawoffices.com

Heather H. Starnes*
HEALY LAW OFFICES, LLC
12 Perdido Circle
Little Rock, AR 72211
(501) 516-0041
heather@healylawoffices.com

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 8th day of May, 2020, addressed to:

Carly Masenthin, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604
c.masenthin@kcc.ks.gov

John F. McClymont
McClymont Law Office, PA
P.O. Box 364
Norton, KS 67654
jfmc@att.net

Kirk A. Girard, Asst. CEO
Charles Look, CEO
Prairie Land Electric Cooperative, Inc.
P.O. Box 360
Norton, KS 67654-0360
kgirard@ple.coop
clook@ple.coop

/s/ Terry M. Jarrett
Terry M. Jarrett