

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Application of Great Plains )  
Energy Incorporated, Kansas City Power & )  
Light Company, and Westar Energy, Inc. for ) Docket No. 18-KCPE-095-MER  
Approval of the Merger of Westar Energy, Inc. )  
and Great Plains Energy Incorporated. )

PETITION OF KANSAS ELECTRIC POWER COOPERATIVE, INC. TO INTERVENE

Comes now Kansas Electric Power Cooperative, Inc. (KEPCo) and moves the Corporation Commission of the State of Kansas (Commission) for an order pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 permitting it to intervene in the above captioned proceeding. In support of its petition, KEPCo alleges and states as follows:

1. KEPCo is a corporation duly organized under the laws of the State of Kansas, with its principal place of business at 600 SW Corporate View, Topeka, Kansas 66615. It is authorized to do business and is conducting business in the State of Kansas.

2. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 19 member distribution cooperatives in the State of Kansas, serving approximately 300,000 consumer members.

3. On August 25, 2017, Great Plains Energy Incorporated ("Great Plains Energy"), Kansas City Power & Light Company ("KCP&L") and Westar Energy, Inc. and Kansas Gas and Electric Company ("Westar") submitted their application for approval of the merger of Westar and Great Plains Energy, the parent company of KCP&L.

4. KEPCo is a co-owner of the Wolf Creek Generating Station with KCP&L and Westar. KEPCo also is a co-owner of Iatan Generation Station Unit 2 with KCP&L.

5. A significant amount of KEPCo's power supply is dependent upon Westar's generation fleet, and KEPCo is dependent upon Westar's transmission system.

6. KEPCo and, ultimately, its members will or may be bound by any Commission order or activity in this proceeding, and KEPCo and its members may be adversely affected thereby.

7. KEPCo's interest herein is not adequately represented by any other party.

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

William Riggins (# 12080)  
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Topeka, KS 66615  
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[briggins@kepco.org](mailto:briggins@kepco.org)

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WHEREFORE, KEPCo prays that the Commission enter an Order allowing it to intervene herein and for all other relief which the Commission deems just and proper.



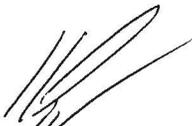
William Riggins (# 12080)  
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**VERIFICATION**

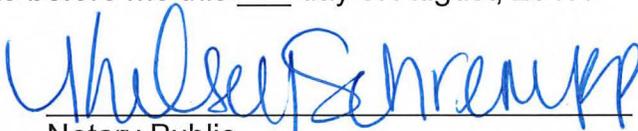
STATE OF KANSAS            )  
  )  
COUNTY OF SHAWNEE    )        ss:

William G. Riggins, of lawful age, being first duly sworn upon his oath states:

That he is an attorney for the above named petitioner, that he has read the above and foregoing Petition to Intervene, and upon information and belief, states that the matters therein appearing are true and correct.

  
\_\_\_\_\_  
William Riggins

SUBSCRIBED AND SWORN to before me this 28<sup>th</sup> day of August, 2017.

  
\_\_\_\_\_  
Notary Public

My Commission expires 2/24/2021



**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing was electronically served or placed in the United States mail, postage prepaid, this 28<sup>th</sup> day of August, 2017, addressed to the following:

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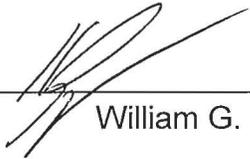
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