

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

In the Matter of the Joint Application of Sunflower )  
Electric Power Corporation, The Victory Electric )  
Cooperative Association, Inc. and Western ) Docket No. 26-SEPE-050-TAR  
Cooperative Electric Association, Inc. for Approval )  
of Continuation of 34.5kV Formula-Based Rates. )

**PETITION TO INTERVENE OF THE KANSAS MUNICIPAL ENERGY AGENCY**

Pursuant to K.S.A. §77-521 and K.A.R. §82-1-225, the Kansas Municipal Energy Agency (KMEA) hereby petitions the State Corporation Commission of the State of Kansas (Commission) for an order granting KMEA's intervention in the above-captioned matter. In support thereof, KMEA states the following:

1. KMEA is a quasi-municipal corporation duly organized under the laws of the State of Kansas,<sup>1</sup> with its principal place of business at 6300 West 95th Street, Overland Park, Kansas 66212. KMEA is authorized to plan, finance, and construct projects for the purchase, sale, generation, and transmission of electricity for purposes of securing an adequate, economical, and reliable supply of electricity and energy for its municipal electric utility membership. KMEA's membership includes more than 88 member cities across the State.

2. On August 11, 2025, Sunflower Electric Power Corporation (Sunflower), The Victory Electric Cooperative, Inc. (Victory), and Western Cooperative Electric Association, Inc. (Western) (collectively, Joint Applicants) filed an application seeking Commission approval for the "[c]ontinuation of Victory's and Western's respective individual 34.5kV Formula-Based Rates

---

<sup>1</sup> K.S.A. §12-885 et seq.

(“34.5kV FBR(s)”), as originally approved in Docket No. 16- MKEE-023-TAR (“023 Docket”) and approved for renewal in Docket No. 21-SEPE-049-TAR (“21-049 Docket”), without any substantive changes” (Joint Application).<sup>2</sup>

3. Certain of KMEA member-cities take service under Victory’s and Western’s respective Local Access Distribution Service (LADS) tariffs. KMEA has participated in Victory’s and Western’s previous annual 34.5kV FBR dockets and seeks intervention in this proceeding to continue protecting the interests of its member-cities.

4. K.S.A. §77-521 provides, in part, that petitions for intervention shall be granted 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 or that the petitioner qualifies as an intervener under any provision of law... and... the presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.”<sup>3</sup> Further, the Commission has discretion to allow intervention “at any time upon determining that the intervention sought is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.”<sup>4</sup>

5. KMEA will or may be bound by any order issued by this Commission and may be substantially affected by the outcome of this proceeding or portions thereof. Further, KMEA’s interests herein are not adequately represented by any other party to this proceeding.

6. All pleadings, orders, notices, communications, and other documents relating to this matter should be served on the undersigned counsel, and on the individual(s) listed below:

---

<sup>2</sup> Joint Application, p. 1.

<sup>3</sup> See also, K.A.R. §82-1-225.

<sup>4</sup> K.S.A. §77-521(b).

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

Darren Prince | Manager, Regulatory & Rates  
KMEA  
6300 West 95th Street  
Overland Park, KS 66212  
(913) 660-0238  
[prince@kmea.com](mailto:prince@kmea.com)

WHEREFORE, KMEA respectfully requests the Commission issue an order granting KMEA intervention in this proceeding, and for any and all other such relief the Commission deems just and proper.

Respectfully Submitted,

*/s/ Terri J. Pemberton*

Terri J. Pemberton (#23297)  
General Counsel  
KMEA  
6300 West 95th Street  
Overland Park, KS 66212  
(913) 374-1365  
[pemberton@kmea.com](mailto:pemberton@kmea.com)  
*Attorney for Kansas Municipal Energy Agency*

## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing *Petition to Intervene of Kansas Municipal Energy Agency* was electronically served on this 20<sup>th</sup> day of August 2025, to the following named persons appearing on the Commission's service list last modified on August 12, 2025:

MADISEN HANE, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[Madisen.Hane@ks.gov](mailto:Madisen.Hane@ks.gov)

SHANE LAWS, CEO  
VICTORY ELECTRIC COOPERATIVE ASSN.,  
INC.  
3230 N 14TH ST  
PO BOX 1335  
DODGE CITY, KS 67801-1335  
[shane@victoryelectric.net](mailto:shane@victoryelectric.net)

AHSAN LATIF, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
[Ahsan.Latif@ks.gov](mailto:Ahsan.Latif@ks.gov)

ANGELA UNRUH  
VICTORY ELECTRIC COOPERATIVE ASSN.,  
INC.  
3230 N 14TH ST  
PO BOX 1335  
DODGE CITY, KS 67801-1335  
[angela@victoryelectric.net](mailto:angela@victoryelectric.net)

JUSTIN CRASWELL, UTILITY RATE  
ANALYST  
POWER SYSTEM ENGINEERING, INC.  
1532 W BROADWAY  
STE 103  
MADISON, WI 53713  
[craswellj@powersystem.org](mailto:craswellj@powersystem.org)

JAMES BRUNGARDT, MANAGER,  
REGULATORY & GOVT. AFFAIRS  
SUNFLOWER ELECTRIC POWER  
CORPORATION  
301 W. 13TH  
PO BOX 1020  
HAYS, KS 67601-1020  
[JBRUNGARDT@SUNFLOWER.NET](mailto:JBRUNGARDT@SUNFLOWER.NET)

RICHARD J MACKE, VP OF ECONOMICS,  
RATES & BUSINESS PLANNING  
POWER SYSTEM ENGINEERING, INC.  
1532 W BROADWAY  
STE 103  
MADISON, WI 53713  
[macker@powersystem.org](mailto:macker@powersystem.org)

MONICA A SEIB, CORPORATE PARALEGAL  
SUPERVISOR  
SUNFLOWER ELECTRIC POWER  
CORPORATION  
301 W. 13TH  
PO BOX 1020  
HAYS, KS 67601-1020  
[mseib@sunflower.net](mailto:mseib@sunflower.net)

STACEY MALSAM, ASSISTANT GENERAL  
MANAGER  
WESTERN COOPERATIVE ELECTRIC ASSN.,  
INC.  
635 S 13TH ST  
PO BOX 278  
WAKEENEY, KS 67672-0278  
[STACEYM@WESTERNCOOP.COM](mailto:STACEYM@WESTERNCOOP.COM)

TAYLOR P. CALCARA, ATTORNEY  
WATKINS CALCARA CHTD.  
1321 MAIN ST STE 300  
PO DRAWER 1110  
GREAT BEND, KS 67530  
[TCALCARA@WCRF.COM](mailto:TCALCARA@WCRF.COM)

NOLAN NUMRICH, GENERAL MANAGER  
WESTERN COOPERATIVE ELECTRIC ASSN.,  
INC.  
635 S 13TH ST  
PO BOX 278  
WAKEENEY, KS 67672-0278  
[nolann@westerncoop.com](mailto:nolann@westerncoop.com)

JACK L ROENNE, ATTORNEY  
WATKINS CALCARA CHTD.  
1321 MAIN ST STE 300  
PO DRAWER 1110  
GREAT BEND, KS 67530  
[jroenne@wcrf.com](mailto:jroenne@wcrf.com)

*/s/ Terri J. Pemberton*

Terri J. Pemberton