

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

In the Matter of the Joint Application of )  
Sunflower Electric Power Corporation and )  
Southern Pioneer Electric Company for ) Docket No. 21-SEPE-047-TAR  
Approval of an Updated 34.5 kV Loss )  
Factor in the Local Access Delivery Tariff. )

**PETITION OF THE KANSAS POWER POOL TO INTERVENE**

COMES NOW the Kansas Power Pool (“KPP”), a Municipal Energy Agency, 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, KPP alleges and states as follows:

1. KPP is a municipal energy agency formed under K.S.A. 12-885, *et seq.*
2. KPP provides wholesale capacity, energy and transmission services to its members, who have all signed KPP’s Amended Operating Agreement. Currently, KPP serves 24 Kansas municipal electric utilities. Sixteen of KPP’s members are in the Westar Energy transmission zone, seven are in the Mid-Kansas Electric Company, LLC (“MKEC”) zone, and one is in the Midwest Energy zone. The seven KPP members who are in the MKEC zone include Greensburg, Attica, Kingman, Holyrood, Lucas, Luray and Glasco, Kansas (“MKEC members”).
3. On July 28, 2020, Southern Pioneer Electric Company (“SPEC”) and Sunflower Electric Power Corporation (“Sunflower”) filed an application with the Kansas Corporation Commission for approval of an updated 34.5 kV loss factor in SPEC’s local access delivery tariff (“Joint Application”).
4. SPEC owns and operates 34.5 kV sub-transmission facilities that provide service to both SPEC’s retail customers and its wholesale local access customers. The wholesale local

access customers' combined load ration share (approximately 40%) of the total 34.5 kV system revenue requirement for these facilities is recovered through the Local Access Delivery Service ("LADS") tariff, where the retail customers' local ratio share of the total 34.5 kV system revenue requirement is bundled and recovered through the composite retail rate found in SPEC's respective retail rate schedules.

5. As indicated in the Joint Application, SPEC's LADS Tariff includes a monthly unit demand local access charge (the "LAC"), as well as a loss factor percentage charge. The Joint Application seeks to increase the loss factor percentage charge from its current, Commission-approved rate of 1.86% to 2.70%.

6. KPP is one of SPEC's wholesale local access customers, and, thus, is required to pay the LADS rates under SPEC's FBR Plan.

7. KPP and, ultimately, its members will or may be bound by any Commission Order or activity in this proceeding, and KPP and its members may be adversely affected thereby.

8. KPP's interests herein are not adequately represented by any other party, and its intervention will not impair the orderly and prompt conduct of the proceedings.

9. All communication and correspondence to KPP, including service of all Notices and Orders of this Commission herein, are requested to be sent to the following named individuals:

Larry Holloway  
Assistant General Manager/Operations  
Kansas Power Pool  
100 North Broadway, Suite L110  
Wichita, Kansas 67202  
Phone: (316) 425-0431  
Fax: (888) 431-4943  
E-mail: [lholloway@kansaspowerpool.org](mailto:lholloway@kansaspowerpool.org)

Amy Fellows Cline (#19995)  
Attorney  
Triplett Woolf Garretson, LLC  
2959 North Rock Road, Suite 300  
Wichita, Kansas 67226  
Phone: (316) 630-8100  
Fax: (316) 630-8101  
E mail: [amycline@twgfirm.com](mailto:amycline@twgfirm.com)

James Ging  
Director of Engineering Services  
Kansas Power Pool  
100 North Broadway, Suite L110  
Wichita, Kansas 67202  
Phone: (316) 425-0431  
Fax: (888) 431-4943  
E-mail: [jging@kansaspowerpool.org](mailto:jging@kansaspowerpool.org)

Mark Chesney  
CEO/General Manager  
Kansas Power Pool  
100 North Broadway, Suite L110  
Wichita, Kansas 67202  
Phone: (316) 425-0431  
Fax: (888) 431-4943  
E-mail: [mchesney@kansaspowerpool.org](mailto:mchesney@kansaspowerpool.org)

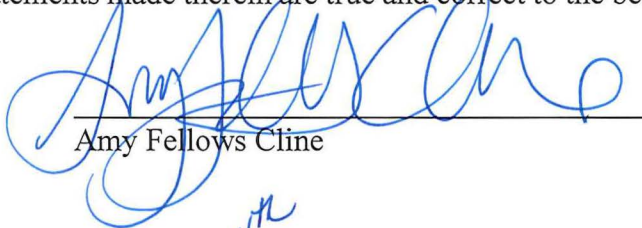
WHEREUPON, KPP prays that the Commission enter an order allowing it to intervene and fully participate in this docket, including but not limited to the right to conduct discovery, file pleadings and testimony, present oral argument, and fully participate in any scheduled hearings, and for all other relief which the Commission deems just and proper.

By: /s/ Amy Fellows Cline  
Amy Fellows Cline, #19995  
Triplett Woolf Garretson, LLC  
2959 N Rock Rd, Suite 300  
Wichita, KS 67226  
Ph 316/630-8100  
Fax 316/630-8101  
[amycline@twgfirm.com](mailto:amycline@twgfirm.com)  
*Attorneys for the Kansas Power Pool*

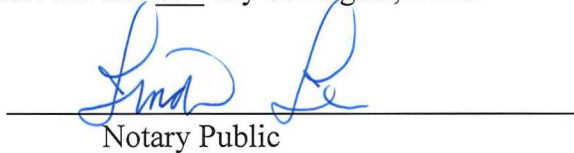
## VERIFICATION

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SEDGWICK    )

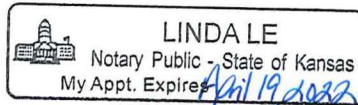
Amy Fellows Cline, of lawful age, being first duly sworn upon my oath, state that I am one of the attorneys for the Kansas Power Pool; that I have read the above Petition; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Amy Fellows Cline

SUBSCRIBED AND SWORN to before me this 11<sup>th</sup> day of August, 2020.

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

My Appointment Expires:



## CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of August, 2020, the Petition of the Kansas Power Pool to Intervene was served via electronic mail to:

<p>Carly Masenthin, Kansas Corporation Commission 1500 Sw Arrowhead Rd Topeka, KS 66604 <a href="mailto:C.Masenthin@Kcc.KS.Gov">C.Masenthin@Kcc.KS.Gov</a></p> <p>James Brungardt Mid-Kansas Electric Company, LLC 301 W 13th St Po Box 980 Hays, KS 67601 <a href="mailto:Jbrungardt@Sunflower.Net">Jbrungardt@Sunflower.Net</a></p> <p>Lindsay Campbell Southern Pioneer Electric Company 1850 W Oklahoma Po Box 430 Ulysses, KS 67880-0368 <a href="mailto:Lcampbell@Pioneerelectric.Coop">Lcampbell@Pioneerelectric.Coop</a></p> <p>Stephen J. Epperson Southern Pioneer Electric Company 1850 W Oklahoma Po Box 430 Ulysses, KS 67880-0368 <a href="mailto:Sepperson@Pioneerelectric.Coop">Sepperson@Pioneerelectric.Coop</a></p> <p>Larissa Hoopingarner Southern Pioneer Electric Company 1850 W Oklahoma Po Box 430 Ulysses, KS 67880-0368 <a href="mailto:Lhoopingarner@Pioneerelectric.Coop">Lhoopingarner@Pioneerelectric.Coop</a></p>	<p>Randy Magnison Southern Pioneer Electric Company 1850 W Oklahoma Po Box 430 Ulysses, KS 67880-0368 <a href="mailto:Rmagnison@Pioneerelectric.Coop">Rmagnison@Pioneerelectric.Coop</a></p> <p>Chantry Scott Southern Pioneer Electric Company 1850 West Oklahoma Po Box 403 Ulysses, KS 67880 <a href="mailto:Cscott@Pioneerelectric.Coop">Cscott@Pioneerelectric.Coop</a></p> <p>Monica A Seib Sunflower Electric Power Corporation 301 W. 13th Po Box 1020 Hays, KS 67601-1020 <a href="mailto:Mseib@Sunflower.Net">Mseib@Sunflower.Net</a></p> <p>Taylor P. Calcara, Watkins Calcara Chtd. 1321 Main St Ste 300 Po Drawer 1110 Great Bend, KS 67530 <a href="mailto:Tcalcara@Wcrf.Com">Tcalcara@Wcrf.Com</a></p> <p>Terry M. Jarrett Healy Law Offices, LLC 514 E. High Street, Ste. 22 Jefferson City, MO 65101 <a href="mailto:terry@healylawoffices.com">terry@healylawoffices.com</a></p>
---	--

/s/ Amy Fellows Cline  
Amy Fellows Cline, ##19995