

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Investigation into)
Southern Pioneer Electric Company)
Regarding the February 2021 Winter) Docket No. 21-SPEE-331-GIE
Weather Events, as Contemplated by)
Docket No. 21-GIMX-303-MIS.)

PETITION TO INTERVENE OF THE
WESTERN KANSAS INDUSTRIAL ENERGY CONSUMERS (“WKIEC”)

COMES NOW Western Kansas Industrial Energy Consumers (“WKIEC”), and respectfully files this Petition to Intervene in the above-referenced case, pursuant to K.A.R. 82-1-225. In support of its Petition, WKIEC states to the State Corporation Commission of the State of Kansas (“KCC” or “Commission”) as follows:

1. WKIEC is a voluntary association of Western Kansas industrial consumers which represents the interests of these industrial consumers in utility proceedings. WKIEC has previously been granted Intervention status by the Commission in other KCC Dockets including KCC Docket No. 14-MKEE-136-TAR.

2. On March 9, 2021, the Commission issued its “Order Adopting Staff’s Report and Recommendation to Open Company Specific Investigations.”

3. The Commission opened a company specific investigation for Southern Pioneer Electric Company (“Southern Pioneer”) in this KCC Docket No. 21-SPEE-331-GIE.

4. Industrial consumers members of WKIEC are direct retail electric customers of Southern Pioneer. The cost of retail electric energy and the terms and conditions for the service of electric energy, are of major importance to the business operations of industrial consume members of WKIEC.

5. The incurrence of a large amount of “extraordinary costs associated with the provision of electric utility service during the February 2021 extreme weather event,” is a matter to be considered by the Commission in the above-entitled Docket.

6. A Commission determination of (a) the amount of extraordinary costs; (b) the recovery period of such extraordinary costs; (c) the method of cost recovery of such extraordinary costs; and (d) the customer cost assignment of such extraordinary costs; may affect Southern Pioneer’s current or future rates, and terms and conditions of service to the industrial consumer members of WKIEC. Therefore, WKIEC and its industrial consumer members have a substantial, direct financial interest in issues that may be addressed, considered, and determined by the Commission in this Docket.

7. WKIEC agrees to accept the state of this Docket in all respects at the time of its Petition and requested Intervention herein.

8. No party to this proceeding adequately represents the interests of WKIEC.

9. WKIEC herein advises the Commission that Air Products and Chemicals, Inc., a direct retail electric customer of Southern Pioneer, will participate in this Docket through its membership in WKIEC. As additional industrial consumers elect to participate in this Docket through WKIEC, the Commission will be promptly advised by WKIEC.

10. WKIEC respectfully requests the right to Intervene without limitation in this matter and to fully participate in all aspects of this Docket through WKIEC, including but not limited to the rights to serve relevant discovery, present witness testimony and other evidence, file briefs, motions, and other documents, as appropriate, and fully participating in any Commission hearings.

WHEREFORE, WKIEC respectfully requests the Commission grant its Petition to Intervene in this matter. WKIEC also requests all other relief to which the Commission determines it may be entitled.

Respectfully submitted,

/s/ **James P. Zakoura**

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**Attorneys for Western Kansas Industrial
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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

James P. Zakoura, being duly sworn upon his oath, deposes and states that he is the Attorney for Western Kansas Industrial Energy Consumers, that he has read and is familiar with the foregoing *Petition to Intervene of Western Kansas Industrial Energy Consumers*, and the statements therein are true to the best of his knowledge, information, and belief.


James P. Zakoura

SUBSCRIBED AND SWORN to before me this 16th day of March, 2021.


Notary Public

My Appointment Expires:

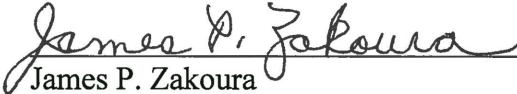


CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of MARCH, 2021, the foregoing *Petition to Intervene of Western Kansas Industrial Energy Consumers*, was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

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