

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a Joint Application of Mid-)
Kansas Electric Company, LLC, Prairie)
Land Electric Cooperative, Inc., Southern)
Pioneer Electric Company, The Victory)
Electric Cooperative Association, Inc., and)
Western Cooperative Electric Association,)
Inc., for Approval of Individual 34.5 kV)
Formula Based Rates.)

Docket No. 16-MKEE-023-TAR

PETITION TO INTERVENE

COMES NOW the Kansas Power Pool (“KPP”), a Municipal Energy Agency, and hereby moves the Corporation Commission of the State of Kansas (“Commission”) for an Order permitting it to intervene in the above-captioned matter. In support of its Petition, KPP states and alleges as follows:

1. The Kansas Power Pool (“KPP”), a Municipal Energy Agency, is a quasi-municipal corporation which is authorized to do business in the State of Kansas. Attached hereto and incorporated herein by reference is a list of KPP Members (Appendix A).

2. On July 16, 2015, the applicants, and each of them, filed their joint Application for Commission Approval of individual 34.5 kV Formula-Based Rates.

3. KPP is requesting permission to intervene in this Docket to represent the interests of its members. KPP members, Greensburg and Kingman are connected to Southern Pioneer’s 34.5 kV transmission system; the City of Attica is interconnected to Wheatland’s 34.5 kV transmission system; and the Cities of Holyrood, Lucas and Luray are interconnected to the 34.5 kV transmission system of Prairie Land Electric Cooperative, Inc. These KPP members are served by the aforementioned 34.5 kV transmission systems and KPP pays Local Access charges that will be affected by this filing. Accordingly, KPP and its members have a justifiable interest in the outcome of this proceeding.

4. The representation of KPP's interests in this proceeding by existing parties is or may be inadequate and no party will represent the interests of municipal energy agencies or its cities, except for KPP.

5. KPP Member Cities, whose interests KPP represents, will be bound by any Commission Order or activity in this proceeding and will or may be adversely affected thereby.

6. In addition to the undersigned, copies of pleadings, documents and correspondence in this docket should be sent to:

Larry W. Holloway, Asst. Mgr. for Operations
100 N. Broadway, Suite L110
Wichita, Kansas 67202
(316) 264-3166
LHolloway@kansaspowerpool.org

WHEREFORE, KPP respectfully requests that this Commission grant its Petition for Intervention in this docket.

Respectfully submitted,

GLAVES, IRBY AND RHOADS



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Counsel for KPP
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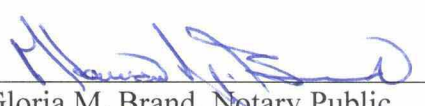
VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

I, Curtis M. Irby, of lawful age, being first duly sworn on his oath deposes and states that he is the attorney for the above named Petitioner; that he read the above and foregoing Petition to Intervene, and upon information and belief, states that the matters therein appearing are true and correct to the best of his knowledge, information and belief.


Curtis M. Irby

Subscribed and sworn to before me
this 21st day of August, 2015.


Gloria M. Brand, Notary Public
My Commission Expires: December 17, 2016



CERTIFICATE OF SERVICE

Curtis M. Irby, the undersigned, hereby certifies that the original of the above and foregoing was e-filed with the Kansas Corporation Commission via their official website this 21st day of August, 2015, and thus served on the parties stated on the Commission's official service list.


Curtis M. Irby

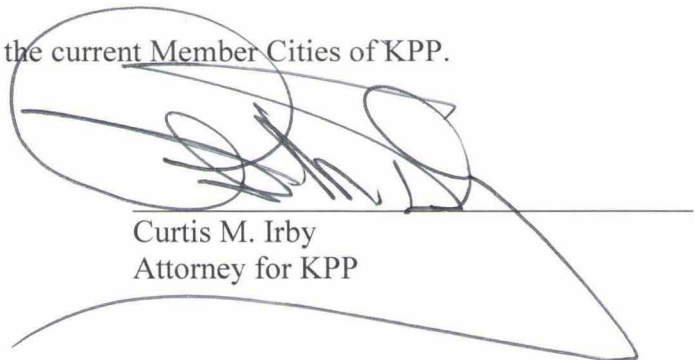
APPENDIX A

At the present time, the Kansas Power Pool ("KPP") consists of the following participants, listed by name and reflects the name of the company from which the city takes transmission service:

LIST OF KPP MEMBER CITIES

City	Transmission Service
Attica	MKEC
Augusta	Westar
Burlington	Westar
Clay Center	Westar
Ellinwood	MWE
Erie	Westar
Greensburg	MKEC
Haven	Westar
Hillsboro	Westar
Holyrood	MKEC
Kingman	MKEC
Lucas	MKEC
Luray	MKEC
Marion	Westar
Minneapolis	Westar
Mount Hope	Westar
Mulvane	Westar
Oxford	Westar
St. Mary's	Westar
Udall	Westar
Waterville	Westar
Wellington	Westar
Winfield	Westar

I certify that the above list reflects the current Member Cities of KPP.



Curtis M. Irby
Attorney for KPP