20171204111505 Filed Date: 12/04/2017 State Corporation Commission of Kansas

## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of a General Investigation to	)	
Determine the Commission's Jurisdiction	)	Docket No. 18-GIME-217-GIE
over Municipal Energy Agencies	)	
	)	

## PETITION OF WESTAR ENERGY, INC. AND KANSAS GAS AND ELECTRIC COMPANY TO INTERVENE

Westar Energy, Inc. and Kansas Gas and Electric Company (Westar) moves that the Commission issue its order allowing Westar to intervene in the above-captioned matter. In support of its Petition, Westar states:

- 1. Westar is a corporation duly incorporated under the laws of the State of Kansas and is engaged, among other things, in the business of an electric public utility, as defined by K.S.A. 66-104, in legally designated areas within the State of Kansas. Westar holds certificates of convenience and authority issued by this Commission authorizing it to engage in such utility business. Westar does business under the name "Westar Energy."
- 2. Westar is a vertically integrated electric utility, serving nearly 700,000 retail customers as well as a large number of wholesale customers in the State of Kansas.
- 3. On November 28, 2017, the Commission issues its Order Opening General Investigation in the above-captioned docket. The Commission indicated that the general investigation will focus on the Commission's jurisdiction over municipal energy agenices (MEAs),
- 4. Westar has a substantial interest in the outcome of this proceeding. The outcome of this docket will have an impact on Westar because several Municipal Energy Agencies, such as KPP and KMEA, serve load off of the Westar transmission system. Sixteen of KPP's members

are served off of the Westar transmission system. For these reasons, Westar has direct interest in the question of whether MEA's on our system are under KCC's jurisdiction when it comes to transmission line siting and when bypassing Westar facilities. For those reasons, Westar respectfully requests that it be permitted to intervene in this matter and requests to be placed on the official service list.

5. In addition to the unsersigned counsel below, Westar requests that the following individuals be placed on the service list:

Jeff Martin Vice-President, Regulatory Affairs 818 South Kansas Avenue Topeka, KS 66612 (785) 575-6362 Jeff.Martin@westarenergy.com

Larry Wilkus
Director, Retail Rates
818 South Kansas Avenue
Topeka, KS 66612
(785) 575-8324
Larry.Wilkus@westarenergy.com

Mo Awad Director, FERC, Regulatory Affairs 818 South Kansas Avenue Topeka, KS 66612 (785) 575-1674 Mo.Awad@westarenergy.com

WHEREFORE, Westar requests that the Commission issue its order granting Westar's petition to intervene in this matter for such other and further relief as may be appropriate.

Respectfully submitted,

WESTAR ENERGY, INC. AND KANSAS GAS AND ELECTRIC COMPANY

Cathryn J. Dinges, #20848 Senior Corporate Counsel 818 South Kansas Avenue Topeka, Kansas 66612 (785) 575-8344; Telephone (785) 575-8136; Fax

cathy.dinges@westarenergy.com

## VERIFICATION

STATE OF KANSAS	)	
	)	SS:
COUNTY OF SHAWNEE	)	

Cathryn J. Dinges, being duly sworn upon her oath deposes and says that she is one of the attorneys for Westar Energy, Inc.; that she is familiar with the **Petition to Intervene** and that the statements therein are true and correct to the best of her knowledge and belief.

Cathryn J. Dinges

SUBSCRIBED AND SWORN to before me this \_\_\_\_\_\_ day of December, 2017.

Notary Public

My Appointment Expires:

MY APPI EXP. DI JOX

Donna G. Quinn

NOTARY PUBLIC-STATE OF KANSAS

## CERTIFICATE OF SERVICE

I hereby certify that on this  $\underline{4}^{th}$  day of December, 2017, the foregoing **Petition to Intervene** was electronically served on all parties of record.

Cathryn J. Dinges