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

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In the Matter of the Application of Prairie Land Electric Cooperative, Inc. Seeking Commission Approval to Update its Local Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Plan Approved in Docket No. 16-MKEE-023-TAR

Docket No. 17-PLCE-478-TAR

## **PETITION TO INTERVENE**

COMES NOW the Kansas Municipal Energy Agency (KMEA) and petitions the Corporation Commission of the State of Kansas (Commission) for intervention in the abovecaptioned case pursuant to K.S.A. 77-521. In support of its petition, KMEA states and alleges as follows:

1. On April 25, 2017, Prairie Land Electric Cooperative, Inc. (Prairie Land) filed with the Commission an application for approval to update its Local Access Delivery Service (LADS) tariff. Prairie Land proposed to increase its LADS demand charge assessed on the wholesale users of its 34.5kV system from \$2.50 per kW to \$2.73 per kW in accordance with the 34.5kV Formula Based Rate plan approved in Docket 16-MKEE-023-TAR.

2. KMEA is a municipal energy agency created pursuant to Kansas law (K.S.A. 12-855 *et seq.*) and authorized by Kansas law to plan, finance, and construct projects for the purchase, sale, generation, and transmission of electricity for the purpose of securing an adequate, economical, and reliable supply of energy for its 77 municipal members. Its business address is 6300 West 95<sup>th</sup> Street, Overland Park, Kansas 66212.

3. KMEA, its members, and their customers will or may be affected by any Commission order or finding in this matter.

4. KMEA's interest in this proceeding is not adequately represented by any other party.

5. All communications and correspondence to KMEA, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

Heather H. Starnes\* Counsel to KMEA Healy Law Offices, LLC 12 Perdido Circle Little Rock, AR 72211 (501) 516-0041 heather@healylawoffices.com

Paul Mahlberg General Manager KMEA 6300 West 95<sup>th</sup> Street Overland Park, KS 66212 (913) 660-0234 mahlberg@kmea.com Terry M. Jarrett\* Counsel to KMEA Healy Law Offices, LLC 514 East High Street, Suite 22 Jefferson City, MO 65101 (573) 415-8379 terry@healylawoffices.com

W. Robert Alderson (#6629) Alderson, Alderson, Weiler, Conklin Burghart & Crow, LLC 2010 South 21<sup>st</sup> Street Topeka, KS 66604 (785) 232-0753 <u>boba@aldersonlaw.com</u>

WHEREFORE, KMEA respectfully requests the Commission enter an Order allowing it to intervene in this proceeding and for all other relief which the Commission deems just and proper.

By:

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COUNSEL TO KMEA

\* Ms. Starnes and Mr. Jarrett are listed as counsel subject to Commission action on their respective Motions for Admission Pro Hac Vice, which are being filed simultaneously herewith.

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this  $16^{-4}$  day of May, 2017, addressed to:

Robert Vincent, Litigation Counsel Kansas Corporation Commission <u>r.vincent@kcc.ks.gov</u>

John F. McClymont, Attorney McClymont Law Office, PA jfmc@att.net

Kirk A. Girard, Director of Finance Prairie Land Electric Cooperative, Inc. kgirard@ple.coop

Charles Look, Assistant to the CEO Prairie Land Electric Cooperative, Inc. <u>clook@prairielandelectric.com</u> Allan Miller, CEO Prairie Land Electric Cooperative, Inc. amiller@ple.coop

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