

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of)
Westar Energy, Inc. and Kansas Gas and)
Electric Company for Approval to Make) Docket No. 18-WSEE-328-RTS
Certain Changes in their Charges for)
Electric Services.)

PETITION TO INTERVENE OF
OCCIDENTAL CHEMICAL CORPORATION

Occidental Chemical Corporation (“Oxy-Chem”) respectfully files this Petition to Intervene in the above-referenced case, pursuant to K.A.R. 82-1-225. In support of its Petition, Oxy-Chem states to the State Corporation Commission of the State of Kansas (“KCC” or “Commission”) as follows:

1. On February 1, 2018, Westar Energy, Inc., and Kansas Gas and Electric Company (collectively referred to as "Westar") filed a Joint Application requesting authorization to make certain changes to its charges for electric service in Kansas.

2. Oxy-Chem’s Wichita, Kansas, facility is the largest user of electric energy in the state of Kansas. Oxy-Chem employs several hundred people in Kansas and creates substantial economic activity in and around Wichita and Sedgwick County, Kansas. Oxy-Chem purchases electric energy from Westar. 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 Oxy-Chem. The matters to be considered by the Commission in the above entitled KCC Docket may affect Westar’s current or future rates and terms and conditions of service to Oxy-Chem. Therefore, Oxy-Chem has a substantial, direct financial interest in all the cost of service, rate design, tariff, and policy issues that may be addressed, considered, and determined by the Commission in this Docket.

3. Oxy-Chem agrees to accept the state of this Docket in all respects at the time of its Petition and requested intervention herein.

4. No party to this proceeding adequately represents the interests of Oxy-Chem. However, Oxy-Chem intends to participate, as appropriate, through the Kansas Industrial Consumers Group, Inc. (KIC). KIC filed a Petition to Intervene in this Docket on February 19, 2018, which was not yet been granted.

5. Oxy-Chem respectfully requests the right to intervene without limitation in this matter and to fully participate in all aspects of this Docket, 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, Oxy-Chem respectfully requests the Commission grant its Petition to Intervene in this matter. Oxy-Chem also requests all other relief to which the Commission determines it may be entitled.

Respectfully submitted,

/s/ **Andrew J. French**

James P. Zakoura, KS Bar #07644
Andrew J. French, KS Bar # 24680
Smithyman & Zakoura, Chartered
750 Commerce Plaza II
7400 West 110th St.
Overland Park, KS 66210
Phone: (913) 661-9800, Ext. 119
Fax: (913) 661-9863
Email: jim@smizak-law.com
andrew@smizak-law.com

Attorneys for Occidental Chemical Corporation

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

Andrew J. French, being duly sworn upon his oath, deposes and states that he is the Attorney for the Kansas Industrial Consumers Group, Inc., that he has read and is familiar with the foregoing *Petition to Intervene of Occidental Chemical Corporation*, and the statements therein are true to the best of his knowledge, information, and belief.



Andrew J. French

SUBSCRIBED AND SWORN to before me this 6th day of March, 2018.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or regular U.S. mail (unless otherwise noted), the 6th day of March, 2018, to the parties below:

MARTIN J. BREGMAN BREGMAN LAW OFFICE, L.L.C. 311 PARKER CIRCLE LAWRENCE, KS 66049 mjb@mjbregmanlaw.com	CATHRYN J. DINGES, SENIOR CORPORATE COUNSEL WESTAR ENERGY, INC. 818 S KANSAS AVE PO BOX 889 TOPEKA, KS 66601-0889 cathy.dinges@westarenergy.com
DAVID W. NICKEL, CONSUMER COUNSEL CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 d.nickel@curb.kansas.gov	THOMAS J. CONNORS, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 tj.connors@curb.kansas.gov
TODD E. LOVE, ATTORNEY CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 t.love@curb.kansas.gov	SHONDA RABB CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 s.rabb@curb.kansas.gov
DELLA SMITH CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD RD TOPEKA, KS 66604 d.smith@curb.kansas.gov	MICHAEL DUENES, ASSISTANT GENERAL COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 m.duenes@kcc.ks.gov
STEPHAN SKEPNEK, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 s.skepnek@kcc.ks.gov	AMBER SMITH, CHIEF LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 a.smith@kcc.ks.gov
KURT J. BOEHM, ATTORNEY BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 kboehm@bkllawfirm.com	JODY KYLER COHN, ATTORNEY BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 jkylerecohn@bkllawfirm.com

ELIZABETH A. BAKER 6610 SW 29th St. Topeka, KS 66614 betsy@bakerlawks.com	KEVIN HIGGINS KEVIN C. HIGGINS PARKSIDE TOWERS 215 S STATE ST STE 200 SALT LAKE CITY, UT 84111 khiggins@energystrat.com
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/s/ **Andrew J. French**
James P. Zakoura
Andrew J. French
SMITHYMAN & ZAKOURA, CHARTERED