

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Joint Application                    )  
of Sunflower Electric Power Corporation,            )  
The Victory Electric Cooperative                    )  
Association, Inc., and Western Cooperative        )  
Electric Association, Inc., for Approval of        )  
Continuation of 34.5kV Formula-Based Rate.)      Docket No. 26-SEPE-050-TAR

**PETITION TO INTERVENE BY KPP ENERGY**

COMES NOW, KPP Energy, A Municipal Energy Agency ("KPP") and moves the Corporation Commission of the State of Kansas ("Commission") for an order pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 permitting it to intervene in the above-captioned proceeding. In support of its Petition, KPP alleges and states as follows:

1. KPP is a municipal energy agency formed under K.S.A. 12-885, *et seq.*
2. KPP provides wholesale capacity, energy and transmission services to its members, who have all signed KPP's Amended Operating Agreement. Currently, KPP serves 24 Kansas municipal electric utilities. KPP's members are located in the Sunflower Electric Power Corporation zone, in The Victory Electric Cooperative Association, Inc. zone, and in the Western Cooperative Electric Association, Inc. zone.
3. The Victory Electric Cooperative Association, Inc. ("Victory"), and Western Cooperative Electric Association, Inc. ("Western") (collectively, "Joint Applicants") jointly filed an application seeking approval for the "[c]ontinuation of Victory's and Western's respective individual 34.5kV FormulaBased Rates ("34.5kV FBR(s)"), as originally approved in Docket No. 16-MKEE-023-TAR ("023 Docket"), and approved for renewal in Docket No. 21-SEPE-049-TAR ("21-049 Docket"), without any substantive changes." Joint Application at p. 1.

4. KPP takes service from Western's 34.5kV facilities pursuant to its Local Access Distribution Service ("LADS") tariff. Any change to the 34.5kV FBR, whether or not substantive, will necessarily impact KPP. KPP seeks to intervene in the docket in order to review the filing and determine the impact of Western's continued use of its FBR mechanism and other changes proposed by the Joint Applicants on KPP in order to protect its interests.

5. For these reasons, KPP has a direct and substantial interest in the issues to be addressed in this docket and such interest cannot be adequately represented by any other party. Further, KPP may or will be substantially affected by any Commission order or activity in this proceeding. K.A.R. 82-1-225(a)(2). Finally, the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing KPP to intervene. K.A.R. 82-1-225(a)(3).

6. Because KPP will or may be bound by any Commission order or activity in this proceeding and may be adversely affected thereby, and because KPP's interest herein may not be adequately represented by any other party, KPP respectfully requests its petition to intervene be granted without limitation.

7. In addition to the undersigned counsel, service of all pleadings, testimony, briefs, orders, correspondence, and other communication relating to this docket should be sent to the following named individuals:

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WHEREFORE, for the above and foregoing reasons, KPP respectfully requests that the Commission grant its Petition to Intervene without limitation and for such other relief as the Commission deems just and proper.

Respectfully submitted,

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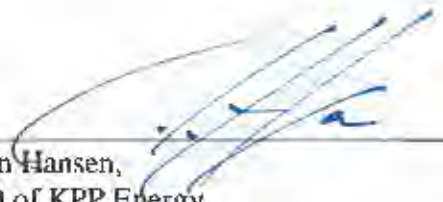


**VERIFICATION**  
**(K.S.A. 53-601)**

STATE OF KANSAS            )  
  ) ss.  
COUNTY OF SEDGWICK    )

I, Colin Hansen, verify under penalty of perjury that I have caused the foregoing Petition to Intervene by KPP Energy to be prepared on behalf of KPP Energy and that I have read and reviewed the Petition; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

Executed on this 19<sup>th</sup> day of August, 2025.

  
\_\_\_\_\_  
Colin Hansen,  
CEO of KPP Energy

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing Petition to Intervene by KPP Energy was electronically served on this 19<sup>th</sup> day of August, 2025, to the following named persons appearing on the Commission's service list:

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