

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Application of Western )  
Cooperative Electric Association, Inc. Seeking )  
Commission Approval to Update its Local ) Docket No. 21-WSTE-404-TAR  
Access Delivery Service Tariff Pursuant to )  
the 34.5kV Formula Based Rate Plan )  
Approved in Docket No. 21-SEPE-049-TAR )

**MOTION FOR ADMISSION OF HEATHER H. STARNES  
PRO HAC VICE**

Pursuant to Kansas Supreme Court Rule 116, I, Terry M. Jarrett, an attorney for Kansas Municipal Energy Agency (KMEA), moves that Heather H. Starnes of Healy Law Offices, LLC be admitted to practice before the State Corporation Commission of the State of Kansas (“Commission”) for purposes of this case only.

I certify that I am a member in good standing of the Kansas bar. In compliance with Supreme Court Rule 116(a), I will sign all pleadings and other papers which are filed before the Commission. I also will be actively engaged in the case, and be present for all appearances, to the extent required by the Commission.

Pursuant to Supreme Court Rule 116(c), I have attached the Affidavit of Heather H. Starnes in support of this motion.

Respectfully submitted,

/s/ Terry M. Jarrett  
Terry M. Jarrett – Kansas Bar No. 27782  
HEALY LAW OFFICES, LLC  
3010 E. Battlefield, Suite A  
Springfield, MO 65804  
(573) 415-8379  
terry@healylawoffices.com

**VERIFICATION**

STATE OF MISSOURI        )  
                                  ) ss:  
COUNTY OF COLE        )

I, Terry M. Jarrett, verify under penalty of perjury that I have caused the foregoing Entry of Appearance to be prepared on behalf of Kansas Municipal Energy Agency; that I have read and reviewed the Motion for Admission of Heather H. Starnes Pro Hac Vice; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

/s/ Terry M. Jarrett  
Terry M. Jarrett

Executed on May 6, 2021.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of May, 2021, a true and correct copy of the above and foregoing was sent electronically to the following:

Cole Bailey  
Kansas Corporation Commission  
[c.bailey@kcc.ks.gov](mailto:c.bailey@kcc.ks.gov)

Phoenix Anshutz  
Kansas Corporation Commission  
[p.anshutz@kcc.ks.gov](mailto:p.anshutz@kcc.ks.gov)

Taylor P. Calcara  
Western Cooperative Electric Assn., Inc.  
[staceym@esterncoop.com](mailto:staceym@esterncoop.com)

Thomas Ruth  
Western Cooperative Electric Assn., Inc.  
[tomr@westerncoop.com](mailto:tomr@westerncoop.com)

/s/ Terry M. Jarrett  
Terry M. Jarrett

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the Matter of the Application of Western     )  
Cooperative Electric Association, Inc. Seeking)  
Commission Approval to Update its Local     )     Docket No. 21-WSTE-404-TAR  
Access Delivery Service Tariff Pursuant to     )  
the 34.5kV Formula Based Rate Plan             )  
Approved in Docket No. 21-SEPE-049-TAR     )

**AFFIDAVIT IN SUPPORT OF MOTION FOR ADMISSION  
OF HEATHER STARNES *PRO HAC VICE***

Heather Starnes, being duly sworn upon her oath, deposes and says:

1.     I represent the Kansas Municipal Energy Agency (KMEA), which is filing an Entry of Appearance in the above-referenced docket concurrently with the Motion for Admission of Heather Starnes *Pro Hac Vice*.

2.     KMEA's local counsel for this proceeding is Terry M. Jarrett, whose contact information is as follows:

Terry M. Jarrett  
HEALY LAW OFFICES, LLC  
3010 E. Battlefield, Suite A  
Springfield, MO 65804  
(573) 415-8379  
terry@healylawoffices.com

3.     My residential address, business address, and telephone number are as follows:

Residential Address: 12 Perdido Circle  
Little Rock, AR 72211

Business Address: 12 Perdido Circle  
Little Rock, AR 72211

Business Phone: (501) 516-0041  
Fax: (417) 864-7018  
Email: heather@healylawoffices.com

4. I am admitted to and a member in good standing of the bar of the State of Missouri, being admitted in 2001. My state bar number is 52608. I am also admitted to and a member in good standing of the bar of the State of Arkansas, having been admitted in 1994. My state bar number is 94113.

5. I am not currently, nor have I ever been, the subject of public discipline, including, but not limited to, suspension or disbarment, in any jurisdiction.

6. I was previously admitted *pro hac vice* to appear before the Commission 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; In the Matter of a General Investigation for the Purpose of Investigating Whether Annual or Periodic Cost/Benefit Reporting by SPP and Kansas Electric Utilities that Participate in SPP is in the Public Interest, Docket No. 17-SPPE-117-GIE; 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 Rate Plan Approved in Docket No. 16-MKEE-023-TAR, Docket No. 19-PLCE-436-TAR; In the Matter of the Application of The Victory Electric Cooperative Association, Inc. Seeking Commission Approval to Update its Local Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No.19-VICE-448-TAR; and In the Matter of the Application of Western Cooperative Electric Association, Inc. Seeking Commission Approval to Update its Local Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No.19-WSTE-443-TAR; In the Matter of the Southern Pioneer Electric Company for Approval of the Continuation of its Debt Service Coverage and 34.5 kV Formula Based



Ratemaking Plans Approved in Docket No. 19-SPEE-240-MIS; 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 Rate Plan Approved in Docket No. 16-MKEE-023-TAR, Docket 20-PLCE-434-TAR; In the Matter of the Application of The Victory Electric Cooperative Association, Inc., Seeking Commission Approval to Update Its Local Access Delivery Service Tariff Pursuant to the 34.5kV Formula Based Rate Plan Approved in Docket No. 16-MKEE-023-TAR, Docket No. 20-VICE-437-TAR; In the Matter of the Application of Western Cooperative Electric, Inc. Seeking Commission Approval to Update its Local Access Delivery Service Tariff Pursuant to the 34.kV Formula Based Rate Plan Approved in Docket No. 16-MKEE-023-TAR, Docket No. 20-WSTE-440-TAR; In the Matter of the Joint Application of Sunflower and Southern Pioneer for the Approval of an Updated 34.5 kV Loss Factor in the Local Access Delivery Service Tariff, Docket No. 21-SEPE-047-TAR; and In the Matter of the Joint Application of Sunflower Electric Power Corporation, Prairie Land Electric Cooperative, Inc., The Victory Electric Cooperative Association, Inc., and Western Cooperative Electric Association, Inc., for Approval of Continuation of 34.5 kV Formula-Based Rates and Updated 34.5 kV Loss Factors, Docket No. 21-SEPE-049-TAR.


FURTHER AFFIANT SAYETH NOT.

**VERIFICATION**

STATE OF ARKANSAS     )  
  ) ss:  
COUNTY OF Pulaski     )

Heather Starnes, of lawful age, being first duly sworn upon her oath, states that:

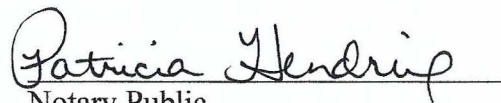
She is one of the attorneys in KCC Docket No. 21-WSTE-404-TAR; she has read the foregoing Affidavit in Support for Admission of Heather Starnes *Pro Hac Vice*, and upon information and belief, states that the matters therein appearing are true and correct.

  
Heather Starnes

SUBSCRIBED AND SWORN TO before me on this 6<sup>th</sup> day of May, 2021.

My appointment expires:

August 2, 2022

  
Notary Public



### CERTIFICATE OF SERVICE

I hereby certify that on the 6<sup>th</sup> day of May, 2021, a true and correct copy of the above and foregoing was sent electronically to the following:

Cole Bailey  
Kansas Corporation Commission  
[c.bailey@kcc.ks.gov](mailto:c.bailey@kcc.ks.gov)

Phoenix Anshutz  
Kansas Corporation Commission  
[p.anshutz@kcc.ks.gov](mailto:p.anshutz@kcc.ks.gov)

Taylor P. Calcara  
Western Cooperative Electric Assn., Inc.  
[staceym@esterncoop.com](mailto:staceym@esterncoop.com)

Thomas Ruth  
Western Cooperative Electric Assn., Inc.  
[tomr@westerncoop.com](mailto:tomr@westerncoop.com)

/s/ Terry M. Jarrett  
Terry M. Jarrett