

Before the
STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Investigation into the Principles and Priorities to be Established for Evaluating the Reasonableness of the Location of a Proposed Transmission Line in Future Line Siting Proceedings.

Docket 24-GIME-102-GIE

**ENTRY OF APPEARANCE
AND PETITION TO INTERVENE**

COMES NOW, The Kansas Farm Bureau (“KFB” or “Intervenor”), and respectfully requests to intervene in the above-captioned case pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support of its petition, Intervenor states and alleges as follows:

1. On August 3, 2023, the Kansas Corporate Commission (“KCC”) filed an Order Opening General Investigation in this matter.
2. KFB is organized in Kansas under the Cooperative Marketing Act. Established in 1919, KFB’s mission is to strengthen agriculture and the lives of Kansans through advocacy, education, and service. KFB has over 106,000 members in all 105 counties in Kansas, of which members, over 30,000 are farmers and ranchers, owning and operating on land in rural Kansas. KFB represents producers across all sectors of Kansas agriculture.
3. Intervenor serves the agricultural industry and is one of the main trade associations representing Kansas farmers and ranchers. The organization functions to advocate

for its members in many different forums. In the energy space, specifically, the Intervenor has participated in matters before the KCC, FERC, and the Kansas Legislature.¹

4. In Kansas, there are 45,759,319 acres of farmland, which accounts for 87.5% of all Kansas land.² More than 21 million acres in Kansas is harvested for crops and over 14 million is pastureland for grazing animals.³ As the largest class of landowners and operators in the state, Kansas' farmers and ranchers are greatly impacted by transmission lines crossing the countryside.

5. The representation of the Intervenor's interests, and the interests of its members, by existing parties is or may be inadequate.

6. "The general criteria governing intervention is set by statute and in the Commission's rules and regulations, specifically K.S.A. 77-521 and K.A.R. 82-1-225."⁴ "These authorities provide the Commission considerable discretion regarding intervention, essentially allowing the Commission to grant intervention if it is determined that the request was made in

¹ See e.g. KFB's intervention before the KCC in *In the Matter of the Application of Kansas Gas Service, a Division of ONE Gas, Inc., for Adjustment of its Natural Gas Rates in the State of Kansas*, Docket No. 18-KGSG-560-RTS, available at <https://estar.kcc.ks.gov/estar/portal/ksccl/page/docket-docs/PSC/DocketDetails.aspx?DocketId=453a43c8-99ac-4d7f-a07c-6f5b7d8fa564>; KFB's coalition comment filed in matter *Applications for Permits to Site Interstate Electric Transmission Facilities*, FERC Docket No. RM22-7-000, May 17, 2023, available at https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20230517-5101&optimized=false; and KFB's testimony filed before the Senate Committee on Utilities on Feb. 15, 2023, available at http://www.kslegislature.org/li/b2023_24/committees/cttes_utils_1/documents/testimony/20230215_02.pdf. Each last accessed Nov. 21, 2023.

² State of Kansas 2022 Economic Contribution Report, prepared by the Kansas Department of Agriculture on Aug. 15, 2022, and available at https://agriculture.ks.gov/docs/default-source/ag-marketing/county-ag-stats/2022-county-ag-stats/state-of-kansas-reports-8-12-2022.pdf?sfvrsn=553e9bc1_4. Kansas Department of Agriculture summary of how Kansas agriculture affects the Kansas economy, available at <https://agriculture.ks.gov/about-kda/kansas-agriculture#:~:text=The%20agriculture%20sector%20in%20Kansas,percent%20of%20all%20Kansas%20land>. Each last accessed Nov. 21, 2023.

³ Kansas Department of Agriculture summary of how Kansas agriculture affects the Kansas economy, available at <https://agriculture.ks.gov/about-kda/kansas-agriculture#:~:text=The%20agriculture%20sector%20in%20Kansas,percent%20of%20all%20Kansas%20land>. Last accessed Nov. 21, 2023.

⁴ *In the Matter of the Application of Kansas Gas Service, a Division of ONE Gas, Inc., for Adjustment of its Natural Gas Rates in the State of Kansas*, Docket No. 18-KGSG-560-RTS, Order Granting Intervention, ¶7 (Oct. 11, 2018).

the interest of justice and will not delay the orderly and prompt conduct of the proceeding.”⁵

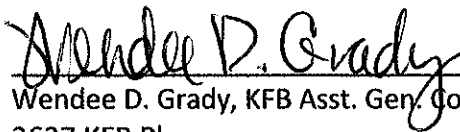
7. The intervenor respectfully submits to this Commission that neither the interests of justice, nor the prompt and orderly conduct of these proceedings will be impaired by granting and permitting its intervention in this docket.

8. If permitted to intervene, KFB will strive to participate in a meaningful way, as a voice for its landowner members, for the thorough investigation into the principles and priorities to be established for evaluating the reasonableness of the location of a proposed transmission line in future line siting proceedings.

9. As mentioned above, KFB has previously been granted the opportunity to intervene in another matter before the Commission.⁶

10. WHEREFORE, Intervenor therefore requests that the Commission grant its Petition to Intervene in this docket and to participate in this docket in a manner that would provide the right to conduct discovery, file pleadings and testimony, present oral argument, and participate in any scheduled hearings as needed and on a limited basis.

Respectfully submitted,



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⁵ *Id.*

⁶ Order Granting Intervention to the Kansas Farm Bureau and Kansas Corn Growers Association, *In the Matter of the Application of Kansas Gas Service, a Division of ONE Gas, Inc., for Adjustment of its Natural Gas Rates in the State of Kansas*, Docket No. 18-KGSG-560-RTS, available at <https://estar.kcc.ks.gov/estar/ViewFile.aspx/18-560-Order-Granting-Intervention-to-KFB-and-KCGA-KGS-Rate-Case.pdf?Id=af3eeddd-a9f1-4084-97dc-b10fc89bb371>. Last accessed Nov. 21, 2023.

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF RILEY)

ss:

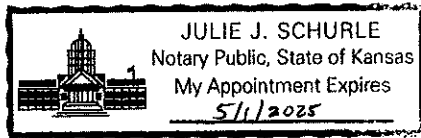
I, Wendee D. Grady, of lawful age and being first duly sworn upon my oath, state that I am an attorney for The Kansas Farm Bureau; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.

Wendee D. Grady
Wendee D. Grady

SUBSCRIBED AND SWORN to before me this 22nd day of November, 2023.

Julie J. Schurle
Notary Public

My Commission expires: 5/1/2025



CERTIFICATE OF SERVICE

On this 22nd day of November, 2023, I hereby certify that a true and correct copy of the foregoing Entry of Appearance and Petition to Intervene was furnished, by means of electronic service, to the following parties:

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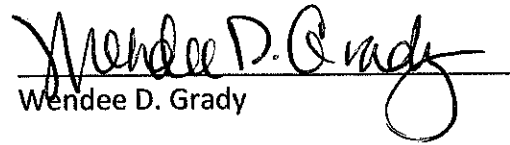
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