

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of Westar Energy, Inc. and Kansas )  
Gas and Electric Company Seeking Commission )  
Approval to Implement Changes in their ) Docket No. 16-WSEE-375-TAR  
Transmission Delivery Charges Rate Schedules )

**PETITION TO INTERVENE**

HollyFrontier El Dorado Refining LLC ("HollyFrontier") petitions the Kansas Corporation Commission ("Commission") pursuant to K.A.R. 82-1-225 to intervene in the above-captioned Transmission Delivery Charge ("TDC") filing made by Westar Energy, Inc. and Kansas Gas and Electric Company d/b/a Westar Energy, Inc. (collectively "Westar"). In support of its Petition to Intervene, HollyFrontier states as follows:

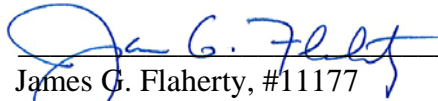
1. HollyFrontier owns and operates the El Dorado Refinery located in El Dorado, Kansas. It is one of the largest crude oil refineries in the Plains States and the Rocky Mountain Region. The El Dorado Refinery receives electric service from Westar pursuant to an Energy Supply Agreement, which was approved by the Commission in Docket No. 12-KG&E-718-CON. The rates under the Energy Supply Agreement are adjusted to reflect any change in Westar's TDC rate schedule that may be approved by the Commission in the above-captioned matter. In the present case, Westar proposes to significantly increase the TDC rate applied to HollyFrontier.

2. HollyFrontier respectfully requests the right to participate in all aspects of this case as may be appropriate herein, including, but not limited to, conducting discovery regarding the proposed increase in the TDC rate. HollyFrontier understands that Westar's proposed TDC rate changes will be approved subject to refund to allow Staff and other intervenors the right to review the filing that has been made by Westar to determine if such complies with the TDC tariff and previous orders

issued by the Commission authorizing Westar to charge customers a TDC rate. HollyFrontier seeks to be involved in that review process and to provide written comments in response to any report and recommendations made to the Commission by Staff.

3. HollyFrontier requests electronic service of all pleadings, orders, and other documents in the above-entitled proceeding and agrees to receive all service, pleadings, testimony, briefs, and orders by electronic service without hard copy follow up as required by K.A.R. 82-1-216(a)(6) at the following email addresses: James G. Flaherty, [jflaherty@andersonbyrd.com](mailto:jflaherty@andersonbyrd.com); Julie B. Hunt, [julie.hunt@hollyfrontier.com](mailto:julie.hunt@hollyfrontier.com); and Greg Wright, [greg@emgnow.com](mailto:greg@emgnow.com).

WHEREFORE, HollyFrontier respectfully requests that the Commission grant its petition for intervention and it be granted all rights of a party in the above-captioned matter.



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James G. Flaherty, #11177

**ANDERSON & BYRD, LLP**

216 S. Hickory, P. O. Box 17

Ottawa, Kansas 66067

(785) 242-1234, telephone

(785) 242-1279, facsimile

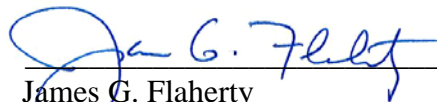
[jflaherty@andersonbyrd.com](mailto:jflaherty@andersonbyrd.com)

Attorneys for HollyFrontier El Dorado Refining LLC

**VERIFICATION**

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF FRANKLIN    )

James G. Flaherty, of lawful age, being first duly sworn on oath, states: That he is an attorney for HollyFrontier El Dorado Refining LLC; that he has read the above and foregoing Petition to Intervene, knows the contents thereof; and that the statements contained therein are true.

  
\_\_\_\_\_  
James G. Flaherty

SUBSCRIBED AND SWORN to before me this 15<sup>th</sup> day of March, 2016.



  
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Appointment/Commission Expires:

Notary Public

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via U.S. Mail, postage prepaid, hand-delivery, or electronically, this 15<sup>th</sup> day of March, 2016, addressed to:

Robert Vincent  
Litigation Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Rd.  
Topeka, KS 66604-4027  
[r.vincent@kcc.ks.gov](mailto:r.vincent@kcc.ks.gov)

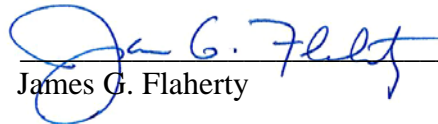
Robin Allacher  
Regulatory Analyst  
Westar Energy, Inc.  
818 S. Kansas Ave., P.O. Box 889  
Topeka, KS 66601-0889  
[robin.allacher@westarenergy.com](mailto:robin.allacher@westarenergy.com)

Brenda Harris  
Director Power  
Occidental Energy Corporation  
5 Greenway Plaza, Suite 110  
Houston, TX 77046-0521  
[brenda\\_harris@oxy.com](mailto:brenda_harris@oxy.com)

Cathryn J. Dinges  
Senior Corporate Counsel  
Westar Energy, Inc.  
818 S. Kansas Ave., P.O. Box 889  
Topeka, KS 66601-0889  
[cathy.dinges@westarenergy.com](mailto:cathy.dinges@westarenergy.com)

James P. Zakoura  
Smithyman & Zakoura, Chtd.  
7400 W. 110<sup>th</sup> St., Ste. 750  
Overland Park, KS 66210-2362  
[jim@smizak-law.com](mailto:jim@smizak-law.com)

Jeffrey L. Martin  
Vice President, Regulatory Affairs  
Westar Energy, Inc.  
818 S. Kansas Ave., P.O. Box 889  
Topeka, KS 66601-0889  
[jeff.martin@westarenergy.com](mailto:jeff.martin@westarenergy.com)



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James G. Flaherty