

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

In the Matter of the Application of Prairie )  
Land Electric Cooperative, Inc. Seeking )  
Commission Approval to Update its Local ) Docket No. 20-PLCE-434-TAR  
Access Delivery Service Tariff Pursuant to )  
the 34.5 kV Formula Based Rate Plan )  
Approved in Docket No. 16-MKEE-023- )  
TAR. )

**PETITION OF THE KANSAS POWER POOL TO INTERVENE**

COMES NOW the Kansas Power Pool (“KPP”), a Municipal Energy Agency, 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. Sixteen of KPP’s members are in the Westar Energy transmission zone, seven are in the Mid-Kansas Electric Company, LLC (“MKEC”) zone, and one is in the Midwest Energy zone. The seven KPP members who are in the MKEC zone include Greensburg, Attica, Kingman, Holyrood, Lucas, Luray and Glasco, Kansas (“MKEC members”).
3. On April 27, 2020, Prairie Land Electric Cooperative, Inc. (“Prairie Land”) filed an application with the Kansas Corporation Commission, which KPP understands was filed for the purpose of updating Prairie Land’s Local Access Delivery Service (LADS) tariff. Expressly, KPP understands Prairie Land proposes to decrease the LADS demand charge assessed on wholesale users of its 34.5 kV system from \$2.88 per kW to \$2.66 per kW.

4. KPP is one of Prairie Land's wholesale local access customers, and, thus, is required to pay the LADS rates under Prairie Land's FBR Plan.

5. KPP and, ultimately, its members will or may be bound by any Commission Order or activity in this proceeding, and KPP and its members may be adversely affected thereby.

6. KPP's interests herein are not adequately represented by any other party, and its intervention will not impair the orderly and prompt conduct of the proceedings.

7. All communication and correspondence to KPP, including service of all Notices and Orders of this Commission herein, are requested to be sent to the following named individuals:

Larry Holloway  
Assistant General Manager/Operations  
Kansas Power Pool  
100 North Broadway, Suite L110  
Wichita, Kansas 67202  
Phone: (316) 425-0431  
Fax: (888) 431-4943  
E-mail: [lholloway@kansaspowerpool.org](mailto:lholloway@kansaspowerpool.org)

Mark Chesney  
CEO/General Manager  
Kansas Power Pool  
100 North Broadway, Suite L110  
Wichita, Kansas 67202  
Phone: (316) 425-0431  
Fax: (888) 431-4943  
E-mail: [mchesney@kansaspowerpool.org](mailto:mchesney@kansaspowerpool.org)

James Ging  
Director of Engineering Services  
Kansas Power Pool  
100 North Broadway, Suite L110  
Wichita, Kansas 67202  
Phone: (316) 425-0431  
Fax: (888) 431-4943  
E-mail: [jging@kansaspowerpool.org](mailto:jging@kansaspowerpool.org)

Amy Fellows Cline (#19995)  
Attorney  
Triplett Woolf Garretson, LLC  
2959 North Rock Road, Suite 300  
Wichita, Kansas 67226  
Phone: (316) 630-8100  
Fax: (316) 630-8101  
E mail: [amycline@twgfirm.com](mailto:amycline@twgfirm.com)

WHEREUPON, KPP prays that the Commission enter an order allowing it to intervene and fully participate in this docket, including but not limited to the right to conduct discovery, file pleadings and testimony, present oral argument, and fully participate in any scheduled hearings, and for all other relief which the Commission deems just and proper.

Respectfully submitted,

By: /s/ Amy Fellows Cline  
Amy Fellows Cline, #19995  
Triplett Woolf Garretson, LLC  
2959 N Rock Rd, Suite 300  
Wichita, KS 67226  
Ph 316/630-8100  
Fax 316/630-8101  
[amycline@twgfirm.com](mailto:amycline@twgfirm.com)  
*Attorneys for the Kansas Power Pool*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of May, 2020, the Petition of the Kansas Power Pool to Intervene was served via electronic mail to:

Casey Masenthin  
Kansas Corporation Commission  
1500 SW Arrowhead Rd  
Topeka, KS 66604  
[p.anshutz@kcc.ks.gov](mailto:p.anshutz@kcc.ks.gov)

John F. McClymont  
McClymont Law Office, PA  
120 S State St  
PO Box 364  
Norton, KS 67654  
[jfmc@att.net](mailto:jfmc@att.net)

Kirk A. Girard  
Prairie Land Electric Cooperative, Inc.  
14935 US Hwy 36  
PO Box 360  
Norton, KS 67654  
[kgirard@ple.coop](mailto:kgirard@ple.coop)

Charles Look  
Prairie Land Electric Cooperative, Inc.  
14935 US Hwy 36  
PO Box 360  
Norton, KS 67654  
[clook@ple.coop](mailto:clook@ple.coop)

/s/ Amy Fellows Cline  
Amy Fellows Cline, ##19995