

**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. 19-PLCE-436-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 24, 2019, Prairie Land Electric Cooperative, Inc. (“Prairie Land”) filed an application with the Kansas Corporation Commission for the purpose of updating its Local Access Delivery Service (LADS) tariff. Expressly, Prairie Land proposes to increase the LADS demand charge assessed on wholesale users of its 34.5 kV system from \$2.79 per kW to \$2.87 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  
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Mark Chesney  
CEO/General Manager  
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James Ging  
Director of Engineering Services  
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Amy Fellows Cline (#19995)  
Attorney  
Triplett Woolf Garretson, LLC  
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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.

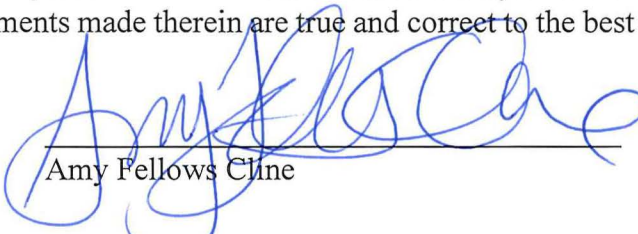
Respectfully submitted,

By: /s/ Amy Fellows Cline  
Amy Fellows Cline, #19995  
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[amycline@twgfirm.com](mailto:amycline@twgfirm.com)  
*Attorneys for the Kansas Power Pool*

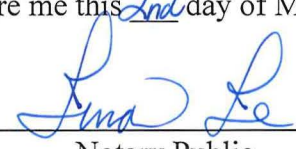
## VERIFICATION

STATE OF KANSAS            )  
                                          ) ss:  
COUNTY OF SEDGWICK    )

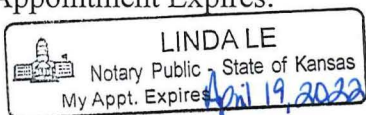
Amy Fellows Cline, of lawful age, being first duly sworn upon my oath, state that I am one of the attorneys for the Kansas Power Pool; that I have read the above Petition; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Amy Fellows Cline

SUBSCRIBED AND SWORN to before me this 2nd day of May, 2019.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires:



## **CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of May, 2019, the Petition of the Kansas Power Pool to Intervene was served via electronic mail to:

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