

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

In the Matter of the Application of Southern)
Pioneer Electric Company for Approval of) Docket No. 24-SPEE-540-TAR
its Renewable Energy Program Rider Tariff.)

NATIONAL BEEF PACKAGING COMPANY, LLC’S
PETITION FOR INTERVENTION

Pursuant to K.A.R. 82-1-225, National Beef Packaging Company, LLC (“National Beef”) hereby files this Petition to Intervene in the above-captioned matter. In support of its Petition, National Beef alleges and states the following:

1. National Beef is a retail ratepayer and direct connected customer of Southern Pioneer Electric Company (“Southern Pioneer”).
2. On January 31, 2024, Southern Pioneer filed its Application requesting approval of its Renewable Energy Program Rider Tariff.
3. The Commission has broad discretion to grant a petition for intervention if it is in the interest of justice, if the intervention will not impair the orderly and prompt conduct of the proceedings, and if the party has stated facts demonstrating its legal rights, duties and privileges, immunities or other legal interests may be substantially affected by the proceeding. *See* K.A.R. 82-1-225(a).
4. As a retail ratepayer of Southern Pioneer, National Beef has a direct financial interest in this Docket.
5. In the interest of justice, and because National Beef’s direct financial interests will be substantially affected by this proceeding and are not adequately represented by any other party, the Commission’s grant of this Petition is proper.

6. If granted intervention rights, National Beef is prepared to actively participate in the timely disposition of this proceeding.

7. No prejudice will be suffered by Southern Pioneer or other parties if this Commission grants this Petition.

8. All communications, correspondence, orders, decisions, and pleadings in this docket should be directed to:

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WHEREFORE, for the foregoing reasons, National Beef respectfully requests that the Commission grant its Petition for Intervention in this matter, without limitation, such that National Beef will receive notice of all pleadings and orders, may produce and cross-examine witnesses, be heard on the arguments, and in all other respects fully participate in this proceeding.

Respectfully submitted,

FOULSTON SIEFKIN LLP

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ATTORNEYS FOR NATIONAL BEEF

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February 2024, the foregoing was electronically filed with the Kansas Corporation Commission and that one copy was delivered electronically to all parties on the service list as follows:

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