

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

BEFORE COMMISSIONERS:     Dwight Keen, Chair  
                                      Shari Feist Albrecht, Commissioner  
                                      Jay Scott Emler, Commissioner

In The Matter of the Joint Application of     )  
Westar Energy, Inc. and Kansas Gas and     )  
Electric Company for Recovery of Certain     )  
Costs Through Their RECA.                     )

Docket No. 19-WSEE-355-TAR

**PETITION TO INTERVENE**

COMES NOW, Unified School District #259 Sedgwick County, Kansas (hereinafter “USD 259”) and respectfully moves the Corporation Commission of the State of Kansas (the “Commission”) for an order permitting its intervention and full participation in the captioned proceeding. In support of its Petition, USD 259 states:

1.     USD 259 comprises the Wichita Public School system and is the largest public school system and district in the state of Kansas, serving approximately 51,000 students.

2.     On March 4, 2019, Westar Energy, Inc. and Kansas Gas and Electric Company (hereinafter “Westar”) filed a joint application with the Commission for recovery of certain costs through their Retail Electric Cost Adjustment (RECA) Tariff.

3.     USD 259 takes all of its electric service from Westar except for its new Southeast High School. USD 259 maintains 106 buildings, approximately 140 electric meters, and consumed approximately 93,300,000 kilowatt hours of electricity supplied by Westar at a cost of \$7,769,832.00 in the last fiscal year.

4.     Public schools are classified as their own rate class. USD 259 is part of the public schools rate class and is the largest school district in the state of Kansas. No other customer taking electric service under the public schools rate class has intervened or sought to intervene in this

case to date. Therefore, no other party can adequately represent the unique interests of USD 259 in these proceedings.

5. Public schools (including USD 259) will be bound by any Commission order or activity in this proceeding. The rates paid and the services received by public schools may be substantially affected by any Commission order or activity in this proceeding with respect to the proposed recovery of certain costs through Westar's RECA Tariff, as described in Westar's application.

6. The future workforce of the state of Kansas will be filled by many of today's 51,000 students in the Wichita Public Schools. Students today are tomorrow's workers, customers, and owners of local business. The quality of education provided to Wichita Public School students is crucial to future economic vitality in Wichita and the state of Kansas. It is one of the missions of the Wichita Public Schools to produce students that meet workforce needs of today's and tomorrow's world. Any electric rates above cost of service divert increasingly scarce and limited public school funds away from the classroom and hinder these efforts. The electric rates paid and services received by USD 259 will be substantially impacted by any order entered by the Commission herein. USD 259 requests permission to intervene in this docket and participate fully.

7. USD 259 requests the right to conduct discovery, present witnesses, cross-examine witnesses, and participate in all aspects of this Docket. The interests of justice will be served and the orderly and prompt conduct of these proceedings will not be impaired by allowing the intervention of USD 259 to fully participate therein.


8. In addition to the undersigned counsel, please include the following USD 259 representatives with all electronic notices, pleadings, and correspondence regarding this Application:

Tom Powell  
General Counsel — USD 259  
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WHEREFORE, USD 259 respectfully requests that the Commission enter an order granting it full participation in the captioned proceedings.

Respectfully submitted,

TRIPLETT WOOLF GARRETSON, LLC

By   
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Timothy E. McKee, #07135  
Amy Fellows Cline, #19995  
*Attorneys for USD 259*

VERIFICATION

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SEDGWICK    )

THOMAS R. POWELL, of lawful age, being first duly sworn, upon oath states: He is the General Counsel for USD 259, and that he has read the above Petition to Intervene knows the contents and knows that the statements made therein are true and correct, to the best of his knowledge and belief.

Thomas R. Powell

Print Name: Thomas R. Powell

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



Terril L. Brooks  
Notary Public

My Commission Expires:

4-17-2023

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 2nd day of May, 2019, to the following:

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