

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of)
Sunflower Electric Power Corporation and)
Prairie Land Electric Cooperative, Inc., for) Docket No. 26-SEPE-049-TAR
Approval of Continuation of 34.5 kV)
Formula-Based Rate.)

PETITION TO INTERVENE BY KPP ENERGY

COMES NOW, KPP Energy, A Municipal Energy Agency (“KPP”) 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. KPP’s members are located in the Sunflower Electric Power Corporation zone and in the Prairie Land Electric Cooperative, Inc. zone.
3. On August 11, 2025, Sunflower Electric Power Corporation (“Sunflower”) and Prairie Land Electric Cooperative, Inc. (“Prairie Land”) (collectively, “Joint Applicants”) jointly filed an application seeking approval for “[c]ontinuation of Prairie Land’s respective individual 34.5kV Formula-Based Rates (“34.5kV FBR(s)”), as originally approved in Docket No. 16-MKEE-023-TAR (“023 Docket”) and approved for renewal in Docket No. 21-SEPE-049-TAR (“21-049 Docket”), without any substantive changes.” Joint Application at p. 1.

4. KPP takes service from Prairie Land's 34.5kV facilities pursuant to its Local Access Distribution Service ("LADS") tariff. Any change to the 34.5kV FBR, whether or not substantive, will necessarily impact KPP. KPP seeks to intervene in the docket in order to review the filing and determine the impact of Prairie Land's continued use of its FBR mechanism and other changes proposed by the Joint Applicants on KPP in order to protect its interests.

5. For these reasons, KPP has a direct and substantial interest in the issues to be addressed in this docket and such interest cannot be adequately represented by any other party. Further, KPP may or will be substantially affected by any Commission order or activity in this proceeding. K.A.R. 82-1-225(a)(2). Finally, the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing KPP to intervene. K.A.R. 82-1-225(a)(3).

6. Because KPP will or may be bound by any Commission order or activity in this proceeding and may be adversely affected thereby, and because KPP's interest herein may not be adequately represented by any other party, KPP respectfully requests its petition to intervene be granted without limitation.

7. In addition to the undersigned counsel, service of all pleadings, testimony, briefs, orders, correspondence, and other communication relating to this docket should be sent to the following named individuals:

Colin Hansen
CEO/ General Manager
KPP Energy
2229 S. West
Wichita, KS 67213
Phone: (316) 264-3166
Email: chansen@kpp.energy

Larry Halloway
Consultant
KPP Energy
6856 Lake Ridge Pkwy.
Ozawie, KS 66070
Phone: (785) 213-1590
Email: lwholloway.pe@gmail.com

James Ging
COO
KPP Energy
2229 S. West
Wichita, KS 67213
Phone: (316) 264-3166
Email: jging@kpp.energy

J.T. Klaus (#14515)
Attorney
Spencer Fane LLP
6201 College Boulevard, Suite 500
Overland Park, KS 6621
Phone: (316) 246-2693
Email: jtklaus@spencerfane.com

Kendra D. Stacey (#29359)
Attorney
Spencer Fane LLP
6201 College Boulevard, Suite 500
Overland Park, KS 66211
Phone: (316)246-2697
Email: kstacey@spencerfane.com

WHEREFORE, for the above and foregoing reasons, KPP respectfully requests that the Commission grant its Petition to Intervene without limitation and for such other relief as the Commission deems just and proper.

Respectfully submitted,

SPENCER FANE LLP

By: /s/ Kendra D. Stacey

J.T. Klaus, KS #14515
Kendra D. Stacey, KS #29359
6201 College Boulevard, Suite 500
Overland Park, KS 66211
O: 316-264-2697

kstacey@spencerfane.com

jtklaus@spencerfane.com

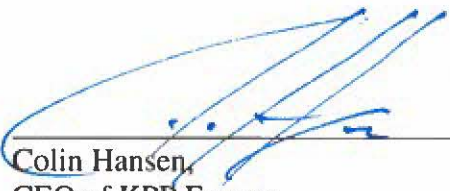
Attorneys for KPP Energy

VERIFICATION
(K.S.A. 53-601)

STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

I, Colin Hansen, verify under penalty of perjury that I have caused the foregoing Petition to Intervene by KPP Energy to be prepared on behalf of KPP Energy and that I have read and reviewed the Petition; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

Executed on this 19th day of August 2025.



Colin Hansen,
CEO of KPP Energy

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Petition to Intervene by KPP Energy was electronically served on this 19th day of August 2025, to the following named persons appearing on the Commission's service list:

MADISEN HANE, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Madisen.Hane@ks.gov

AHSAN LATIF, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Ahsan.Latif@ks.gov

JUSTIN CRASWELL, UTILITY RATE ANALYST
POWER SYSTEM ENGINEERING, INC.
1532 W BROADWAY
STE 103
MADISON, WI 53713
craswellj@powersystem.org

RICHARD J MACKE, VP OF ECONOMICS, RATES & BUSINESS PLANNING
POWER SYSTEM ENGINEERING, INC.
1532 W BROADWAY
STE 103
MADISON, WI 53713
macker@powersystem.org

KIRK A. GIRARD, CEO
PRAIRIE LAND ELECTRIC COOPERATIVE, INC.
14935 US HWY 36
PO BOX 360
NORTON, KS 67654-0360
kgirard@ple.coop

ELENA LARSON, DIRECTOR OF MEMBER SERVICES
PRAIRIE LAND ELECTRIC COOPERATIVE, INC.
14935 US HWY 36
PO BOX 360
NORTON, KS 67654-0360
elarson@ple.coop

JAMES BRUNGARDT, MANAGER, REGULATORY & GOVT. AFFAIRS
SUNFLOWER ELECTRIC POWER CORPORATION
301 W. 13TH
PO BOX 1020
HAYS, KS 67601-1020
JBRUNGARDT@SUNFLOWER.NET

MONICA A SEIB, CORPORATE PARALEGAL SUPERVISOR
SUNFLOWER ELECTRIC POWER CORPORATION
301 W. 13TH
PO BOX 1020
HAYS, KS 67601-1020
mseib@sunflower.net

TAYLOR P. CALCARA, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN ST STE 300
PO DRAWER 1110
GREAT BEND, KS 67530
TCALCARA@WCRF.COM

JACK L ROENNE, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN ST STE 300
PO DRAWER 1110
GREAT BEND, KS 67530
jroenne@wcrf.com

/s/ Kendra D. Stacey
Kendra D. Stacey, #29359