

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

Before Commissioners: Pat Apple, Chair
 Shari Feist Albrecht
 Jay Scott Emler

In the Matter of the Joint Application of)
Mid-Kansas Electric Company, LLC,)
Sunflower Electric Power Corporation,) Docket No. 18-MKEE-160-TFR
Prairie Land Electric Cooperative, Inc.,)
Pioneer Electric Cooperative, Inc., The)
Victory Electric Cooperative Association,)
Inc., Western Cooperative Electric)
Association, Inc., Wheatland Electric)
Cooperative, Inc. and Southern Pioneer)
Electric Company for Approval of a Local)
Access Tariff and Mid-Kansas and)
Sunflower Open Access Transmission)
Tariff.)

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 (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 October 11, 2017, Mid-Kansas Electric Company, LLC, Sunflower Electric Power Corporation, Prairie Land Electric Cooperative, Inc., Pioneer Electric Cooperative, Inc., The Victory Electric Cooperative Association, Inc., Western Cooperative Electric Association, Inc., Wheatland Electric Cooperative, Inc. and Southern Pioneer Electric Company (collectively, Applicants) submitted their joint application for approval of a Local Access Tariff and Mid-Kansas and Sunflower Open Access Transmission Tariff.

4. The joint application submitted by Applicants seeks approval of significant changes to the current terms and conditions of the Mid-Kansas Open Access Transmission Tariff (OATT) and the Southern Pioneer Local Access Delivery Service Tariff (LADST).

5. KPP (on behalf of its MKEC members) is a wholesale local access customer of one or more of the Applicants and currently pays for Open Access Transmission via the Mid-Kansas OATT and also pays for Local Access Service via the Southern Pioneer LADST.

6. 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.

7. KPP's interests herein are not adequately represented by any other party.

8. 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

Timothy E. McKee (#7135)
Attorney
TRIPLETT WOOLF GARRETSON, LLC
2959 North Rock Road, Suite 300
Wichita, Kansas 67226
Phone: (316) 630-8100
Fax: (316) 630-8101
E mail: temckee@twgfirm.com

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

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

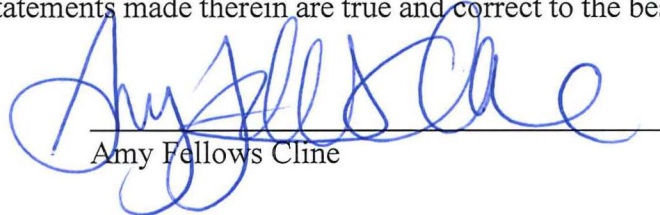
WHEREUPON, KPP prays that the Commission enter an order allowing it to intervene herein and for all other relief which the Commission deems just and proper.

By: /s/ Timothy E. McKee
Timothy E. McKee, #7135
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
tmckee@twgfirm.com
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.



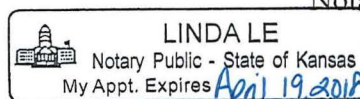
Amy Fellows Cline

SUBSCRIBED AND SWORN to before me this day of October, 2017.



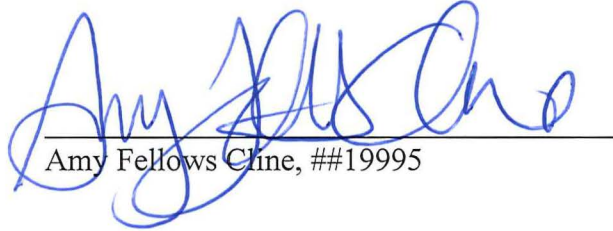
Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of October, 2017, the Petition of the Kansas Power Pool to Intervene was served via electronic mail to:



Amy Fellows Cline, ##19995

David N. Snapp, Attorney
David H. Snapp, LC
100 Military PLZ, Ste. 211
Dodge City, KS 67801-4945
Dsnapp3@starrtech.net

E. Jay Deines, Attorney
Deines & Deines
110 N. Main
PO Box 398
Wakeeney, KS 67672
ejdeines@ruraltel.net

Stephan Skepnek, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604-4027
s.skepnek@kcc.ks.gov

John F. McClymont, Attorney
McClymont Law Office, PA
120 S. State ST.
PO Box 364
Norton, KS 67654
JFMC@att.net

James Brungardt, Manager, Regulatory Relations
Mid-Kansas Electric Co., LLC
301 W. 13th ST.
PO Box 980
Hays, KS 67601
jbrungardt@sunflower.net

Stephen J. Epperson, CEO
Pioneer Electric Coop. Assn., Inc.
1850 W. Oklahoma
PO Box 368
Ulysses, KS 67880-0368
sepperson@pioneerelectric.coop

Charles Look, Assistant to the CEO
Prairie Land Electric Cooperative, Inc.
14935 US Hwy 36
PO Box 360
Norton, KS 67654-0360
cllook@prairielandelectric.com

Allan Miller, CEO
Prairie Land Electric Cooperative, Inc.
14935 US Hwy 36
PO Box 360
Norton, KS 67654-0360
amiller@ple.coop

Randy Magnison, Exec VP & Asst. CEO
Southern Pioneer Electric Co.
1850 W. Oklahoma
PO Box 430
Ulysses, KS 67880-0430
rmagnison@pioneerelectric.coop

Lindsay Shepard, Executive VP – General Counsel
Southern Pioneer Electric Co.
1850 W. Oklahoma
PO Box 430
Ulysses, KS 67880-0430
lshepard@pioneerelectric.coop

Renee Braun, Corporate Paralegal, Supervisor
Sunflower Electric Power Corporation
301 W. 13th
PO Box 1020
Hays, KS 67601
rbraun@sunflower.net

Shane Laws, CEO
Victory Electric Cooperative Assn., Inc.
3230 N. 14th St.
PO Box 1335
Dodge City, KS 67801-1335
shane@victoryelectric.net

Mark D. Calcara, Attorney
Watkins Calcara Chtd.
1321 Main St., Ste. 300
PO Drawer 1110
Great Bend, KS 67530
mcalcara@wcrf.com

Taylor P. Calcara, Attorney
Watkins Calcara Chtd.
1321 Main St., Ste. 300
PO Drawer 1110
Great Bend, KS 67530
tcalcara@wcrf.com

James M. McVay, Attorney
Watkins Calcara Chtd.
1321 Main St., Ste. 300
PO Drawer 1110
Great Bend, KS 67530
jmcvay@wcrf.com

Dennis Deines, Co-General Manager
Western Cooperative Electric Assn., Inc.
635 S. 13th St.
PO Box 278
Wakeeney, KS 67672-0278
dennisd@westerncoop.com

Stacey Malsam, Assistant General Manager
Western Cooperative Electric Assn., Inc.
635 S. 13th St.
PO Box 278
Wakeeney, KS 67672-0278
staceym@westerncoop.com

Trey Grebe, Assistant General Manager
Wheatland Electric Cooperative, Inc.
101 Main St.
PO Box 230
Scott City, KS 67871
tgrebe@weci.net

Bruce W. Mueller, General Manager
Wheatland Electric Cooperative, Inc.
101 Main St.
PO Box 230
Scott City, KS 67871
[bmuellet@weci.net](mailto:bmueller@weci.net)