

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

In the Matter of the Application of]
Evergy Kansas Central, Inc., and]
Evergy Kansas South, Inc., for the] Docket No. 25-EKCE-294-RTS
Approval to Make Certain Changes]
in their Charges for Electric Service.]

PETITION

COMES NOW, Unified School District #259 Sedgwick County, Kansas (hereinafter “USD 259”) and respectfully petitions 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:

I. Background

1. On January 31, 2025, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc. (collectively referred to as “Evergy Kansas Central” or “EKC” or “Joint Applicants”) filed a “Joint Application” to make changes to their charges for electric service in Kansas.

2. The Joint Application requests a significant increase in retail electric rates and to Evergy’s tariffs that govern terms of retail electric service.

II. Petition to Intervene

3. USD 259 comprises the Wichita Public School system and is the largest public school system in the state of Kansas, serving approximately 50,000 students. USD 259 is part of the public schools’ rate class and is the largest school district in the state of Kansas.

4. USD 259 is a significant user of electricity supplied principally by Evergy Kansas Central having consumed approximately 75,082,187KWh of electricity supplied at a cost of \$8,552,098.00 for the “test year” ending September 30, 2022.

5. USD 259 consumed approximately 74,669,823KWh of electricity supplied at a cost of \$7,860,428.00 for the billing period of July 2021 to June 2022.

6. USD 259 consumed approximately 73,469,558KWh of electricity supplied at a cost of \$8,933,662.00 for the billing period of July 2022 to June 2023.

7. USD 259 consumed approximately 78,260,430KWh of electricity supplied at a cost of \$ 8,520,840.00 for the billing period of July 2023 to June 2024.

8. USD 259 is dependent primarily upon tax revenues to finance its mandated purpose of providing a quality education for Kansas students. The subject of the captioned docket could significantly impact how USD 259 deals with financing and structuring its budget in response to any order coming out of this docket. Thus, USD 259 has a substantial and vital interest in the outcome of this proceeding, which cannot be adequately represented by any other party.

9. USD 259 requests the right to fully 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 participate therein.

III. Requirement for Intervention

10. K.A.R. 82-1-225 provides in pertinent part:

- (a) The presiding officer shall grant a petition for intervention in the following conditions are met:
 - (1) The Petition is submitted in writing to the presiding officer, with copies mailed to all parties named in the presiding office's notice of the hearing, at least three days before the hearing.
 - (2) The petition states facts demonstrating that the petitioner's legal rights, duties, privileges, immunities, or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law.
 - (3) The presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention,

(b) The presiding officer may grant a petition for intervention at any time upon determining that the intervention sought is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

9. The KCC, in applying K.A.R. 82-1-225, has previously stated:

The Commission shall grant Intervention if the Petition:

(1) Is submitted in writing to the presiding officer, with service on all parties named in the Commission's notice of hearing, at least 3 business days before the hearing; (2) states facts demonstrating the petitioner's legal rights, duties, privileges, immunities, or other legal interests may be substantially affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and (3) the interest of Justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. The Commission has discretion to grant intervention at any time where intervention is the interest of justice and will not impair the orderly and prompt conduct of proceedings. At any time during a proceeding, the Commission may impose limitations on the intervenor's participation, which may include: (1) limiting an intervenor's participation to designated issues in which the intervenor has a particular interest demonstrated by the petition; (2) limiting the intervenor's discovery, cross-examination, and other procedures; and (3) requiring intervenors to consolidate their participation in the Proceedings." ORDER GRANTING INTERVENTIONS, KCC Docket No. 22/EKME/254/TAR, March 31, 2022, at para. 8.

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

Daniel Lawrence, #123728
General Counsel, USD 259
903 South Edgemoor, Room 113
Wichita, KS 67218
dlawrence@usd259.net

David Banks
Flint Hills Energy Consultants, LLC
117 S. Parkridge Street
Wichita, KS 67209
david@fheconsultants.net

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: /s/ Timothy E. McKee

Timothy E. McKee, #7135

Kacey S. Mayes, #28224

2959 North Rock Road, Suite 300

Wichita, KS 67226

Telephone: (316) 630-8100

Facsimile: (316) 630-8101

Attorneys for Unified School District #259

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

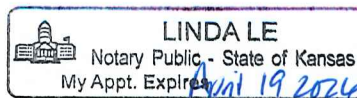
I, Timothy E. McKee, of lawful age, being first duly sworn, upon oath states: I am an attorney representing USD 259, and I have read the above Petition to Intervene and know the contents and know that the statements made therein are true and correct, to the best of my knowledge and belief.

Timothy E. McKee, #07135

SUBSCRIBED AND SWORN to before me on this 19th day of February 2025.

Notary Public

My Commission Expires:



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 19th day of February, 2025, to the following:

JAMES G. FLAHERTY, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067-0017
jflaherty@andersonbyrd.com

JOSEPH R. ASTRAB, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Joseph.Astrab@ks.gov

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Todd.Love@ks.gov

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Shonda.Rabb@ks.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Della.Smith@ks.gov

MELISSA M. BUHRIG, Exec. Vice President, Gen. Counsel & Secretary
CVR REFINING CVL, LLC
2277 Plaza Dr., Ste. 500
Sugar Land, TX 77479
mmbuhrig@CVREnergy.com

JASON T GRAY, ATTORNEY
DUNCAN & ALLEN
1730 Rhode Island Ave., NW Suite 700
Washington, DC 20036
jtg@duncanallen.com

CATHRYN J. DINGES, SR DIRECTOR & REGULATORY AFFAIRS COUNSEL
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
Cathy.Dinges@evergy.com

LESLIE WINES, Sr. Exec. Admin. Asst.
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
leslie.wines@evergy.com

COLE A BAILEY, CORPORATE COUNSEL DIRECTOR
EVERGY KANSAS SOUTH, INC. D/B/A EVERGY KANSAS CENTRAL
818 S KANSAS AVE, PO Box 889
TOPEKA, KS 66601-0889
cole.bailey@evergy.com

DARRIN IVES, VP - REGULATORY AFFAIRS
EVERGY METRO, INC D/B/A EVERGY KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
DARRIN.IVES@EVERGY.COM

RONALD A. KLOTE, DIRECTOR, REGULATORY AFFAIRS
EVERGY METRO, INC D/B/A EVERGY KANSAS METRO
ONE KANSAS CITY PLACE
1200 MAIN, 19TH FLOOR
KANSAS CITY, MO 64105
ronald.klote@evergy.com

Constance Chan, Senior Category Manager - Electricity & Business Travel
HF SINCLAIR EL DORADO REFINING LLC
2323 Victory Ave. Ste 1400
Dalla, TX 75219
constance.chan@hfsinclair.com

Jon Lindsey, Corporate Counsel
HF SINCLAIR EL DORADO REFINING LLC
550 E. South Temple
Salt Lake City, UT 84102
jon.lindsey@hfsinclair.com

BRIAN G. FEDOTIN, GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Brian.Fedotin@ks.gov

PATRICK HURLEY, CHIEF LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Patrick.Hurley@ks.gov

CARLY MASENTHIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
Carly.Masenthin@ks.gov

VALERIE SMITH, ADMINISTRATIVE ASSISTANT
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
vsmith@morrisolaing.com

TREVOR WOHLFORD, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY
800 SW JACKSON
SUITE 1310
TOPEKA, KS 66612-1216
twohlford@morrisolaing.com

GLEND A CAFER, MORRIS LAING LAW FIRM
MORRIS LAING EVANS BROCK & KENNEDY CHTD
800 SW JACKSON STE 1310
TOPEKA, KS 66612-1216
gcafer@morrisolaing.com

RITA LOWE, PARALEGAL
MORRIS LAING EVANS BROCK & KENNEDY CHTD
300 N MEAD STE 200
WICHITA, KS 67202-2745
rlope@morrisolaing.com

WILL B. WOHLFORD, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY CHTD
300 N MEAD STE 200
WICHITA, KS 67202-2745
wwohlford@morrisolaing.com

ANNE E. CALLENBACH, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
acallenbach@polsinelli.com

FRANK A. CARO, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
fcaro@polsinelli.com

JARED R. JEVONS, ATTORNEY
POLSINELLI PC
900 W 48TH PLACE STE 900
KANSAS CITY, MO 64112
JJEVONS@POLSINELLI.COM

Greg Wright
Priority Power Mgt.
12512 Augusta Dr
Kansas City, KS 66109
gwright@prioritypower.com



Timothy E. McKee, #07135