

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

In the Matter of the Joint Application of)
Mid-Kansas Electric Company, LLC,)
Prairie Land Electric Cooperative, Inc.,)
Southern Pioneer Electric Company,) Docket No. 16-MKEE-023-TAR
The Victory Electric Cooperative Association, Inc., and)
Western Cooperative Electric Association, Inc., for)
Approval of Individual 34.5kV Formula-Based Rates.)

**OBJECTION OF MID-KANSAS ELECTRIC COMPANY, LLC, PRAIRIE LAND
ELECTRIC COOPERATIVE, INC., AND THE VICTORY ELECTRIC COOPERATIVE
ASSOCIATION, INC. TO**

PETITION TO INTERVENE OF THE KANSAS POWER POOL

Mid-Kansas Electric Company, LLC ("Mid-Kansas"), Prairie Land Electric Cooperative, Inc. ("Prairie Land"), and The Victory Electric Cooperative Association, Inc. ("Victory")(collectively, the "Objecting Parties") hereby object to the Petition to Intervene of the Kansas Power Pool ("KPP") filed in this docket on August 21, 2015. In support of its objection, the Objecting Parties state as follows:

1. A petition to intervene by KPP in this proceeding must state facts demonstrating that KPP's legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding.¹ KPP fails to meet this standard with respect to the 34.5kV formula-based rates ("34.5kV FBRs") applied for by Prairie Land and Victory because KPP is unaffected with respect to Prairie Land's and Victory's 34.5kV FBRs.

¹ K.S.A. 77-521(a)(2) and K.A.R. 82-1-225(a)(2).

2. As stated in the Joint Application filed in this Docket, Mid-Kansas, Prairie Land, Southern Pioneer Electric Company (“Southern Pioneer”), Victory, and Western Cooperative Electric Association, Inc. (“Western”) have filed a request for approval of four respective 34.5kV FBRs.

3. KPP states that it has an interest in the proceeding for the following reasons:

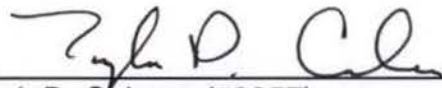
- a. KPP members, the Cities of Greensburg and Kingman, are connected to Southern Pioneer’s 34.5kV transmission system;
- b. KPP member, the City of Attica, is interconnected to Wheatland Electric Cooperative, Inc.’s (“Wheatland”) 34.5kV transmission system;
- c. KPP members, the Cities of Holyrood, Lucas, and Luray, are interconnected to the 34.5kV transmission system of Prairie Land; and
- d. These KPP members are served by the aforementioned 34.5kV transmission systems and KPP pays local access charges that will be affected by this filing.²

4. KPP’s Petition to Intervene erroneously states that the Cities of Holyrood, Lucas, and Luray are served by Prairie Land. Those cities are served by Western. In addition, although a KPP member city takes service from Wheatland Electric Cooperative, Inc. (“Wheatland”), Wheatland is not a party to this proceeding. With respect to this proceeding, KPP member cities only take service from Southern Pioneer and Western. KPP will not be billed any rates calculated by Prairie Land’s or Victory’s 34.5kV FBR.

² Petition to Intervene of the Kansas Power Pool, filed on August 21, 2015, Docket No. 16-MKEE-023-TAR, ¶3.

5. KPP, and its members indirectly, will be entirely unaffected by any outcome of Prairie Land's and Victory's 34.5kV FBR. Therefore, KPP's Petition to Intervene with respect to the 34.5kV FBRs applied for by Prairie Land and Victory fails to meet the requirements of K.A.R. 82-1-225(a)(2) and should be denied. Any approved intervention should be limited to matters related only to Southern Pioneer's and Western's 34.5kV FBRs.

Respectfully submitted,



Mark D. Calcara (#9957)
Taylor P. Calcara (#25561)
Watkins Calcara, Chtd.
1321 Main Street, Suite 300
P.O. Drawer 1110
Great Bend, Kansas 67530
(620) 792-8231 telephone
(620) 792-2775 facsimile
mcalcara@sunflower.net
tcalcara@wcrf.com

**COUNSEL FOR MID-KANSAS ELECTRIC
COMPANY, LLC, PRAIRIE LAND ELECTRIC
COOPERATIVE, INC., AND THE VICTORY
ELECTRIC COOPERATIVE ASSOCIATION,
INC.**

VERIFICATION

STATE OF KANSAS

)

)

ss:

COUNTY OF ELLIS

)

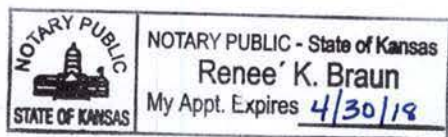
Taylor P. Calcara, of lawful age, being first duly sworn on oath states:

That he is counsel for Mid-Kansas Electric Company, LLC, Prairie Land Electric Cooperative, Inc., and The Victory Electric Cooperative Association, Inc.; that he has read the foregoing pleading and knows the contents thereof; and that the facts therein are true and correct to the best of his knowledge, information, and belief.



Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 31st day of August, 2015.





Notary Public

My Commission expires: April 30, 2018

CERTIFICATE OF SERVICE

I do hereby certify that on the 31st day of August, 2015, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing Objection with a copy mailed to:

/s/ Reneé K. Braun

CURTIS M. IRBY, ATTORNEY
GLAVES IRBY & RHOADS
1050 MARKET CENTER
155 N MARKET
WICHITA, KS 67202

JEFFRY POLLOCK
J. POLLOCK, INCORPORATED
12647 OLIVE BOULEVARD, STE 585
ST. LOUIS, MO 63141-6344

ANDREW FRENCH, LITIGATION
COUNSEL
KANSAS CORPORATION
COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027

MARK DOLJAC, DIR RATES AND
REGULATION
KANSAS ELECTRIC POWER CO-OP,
INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877

WILLIAM G. RIGGINS, SR VICE PRES
AND GENERAL COUNSEL
KANSAS ELECTRIC POWER CO-OP,
INC.
600 SW CORPORATE VIEW (66615)
PO BOX 4877
TOPEKA, KS 66604-0877

LARRY HOLLOWAY, ASST GEN
MGR OPERATIONS
KANSAS POWER POOL
100 N BROADWAY STE L110
WICHITA, KS 67202

and an electronic copy e-mailed to:

Steve Epperson
Randy Magnison
James Brungardt
Chuck Look
Allan Miller
Shane Laws
Darrin Lynch