

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

In the Matter of the General Investigation to)
Examine the Effect of Kansas Senate Bill No.) Docket No. 16-GIME-258-GIE
91 Regarding Renewable Energy Standards)

PETITION TO INTERVENE

COMES NOW Sunflower Electric Power Corporation (“Sunflower”) and Mid-Kansas Electric Company, LLC (“Mid-Kansas”), and pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 moves the Commission to issue an Order allowing Sunflower and Mid-Kansas to intervene in this proceeding. In support of their petition, Sunflower and Mid-Kansas state:

1. On January 5, 2016, the Commission opened the above-captioned docket. Attached to the Commission’s January 5, 2016 Order was Commission Staff’s (“Staff”) November 19, 2015, Report and Recommendation. Staff’s Report and Recommendation detailed Staff’s concerns regarding Kansas Senate Bill No. 91 (“SB 91”), which was signed into law May 28, 2015, repealing and amending sections of the Renewable Energy Standards Act (“RESA”), which in turn affects the Commission’s regulations authorized and required by RESA.

2. Pursuant to K.S.A. 77-521(a)(2)-(3), the Commission shall grant a petition for intervention if it states facts demonstrating that the petitioner’s legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding, and the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention.

3. Sunflower is a corporation duly organized and existing under the laws of the State of Kansas, and Mid-Kansas is a limited liability company duly organized and

existing under the laws of the State of Kansas. Both Sunflower and Mid-Kansas hold a Certificate of Convenience and Necessity to transact business as a Kansas generation and transmission utility and currently develop, own, and operate new or existing generation and transmission assets in Kansas. As such, each will be subject to any changes to the Commission's regulations authorized and required by RESA and amendments thereto.

4. Therefore, Sunflower's and Mid-Kansas' legal rights, duties, privileges, immunities or other legal interests may be substantially affected by this proceeding, and the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the intervention. For the above reasons, Sunflower and Mid-Kansas request that the Commission grant their request and allow Sunflower and Mid-Kansas to fully participate in this matter.

5. All communications and correspondence to Sunflower and Mid-Kansas, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

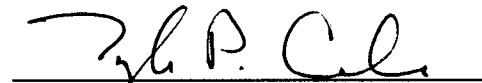
Corey Linville
Vice President, Power Supply and Delivery
Sunflower Electric Power Corporation
PO Box 1020
Hays, KS 67601
clinville@sunflower.net

James Brungardt
Regulatory and Rate Analyst
Sunflower Electric Power Corporation
PO Box 1020
Hays, KS 67601
jbrungardt@sunflower.net

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

WHEREFORE, Sunflower and Mid-Kansas request that the Commission issue an Order granting Sunflower's and Mid-Kansas' petition to intervene in this matter and for such other and further relief as may be appropriate.

Respectfully submitted,



Taylor P. Calcara, #25561
Mark D. Calcara, #09957
Watkins Calcara, Chtd.
Suite 300, 1321 Main Street
P.O. Drawer 1110
Great Bend, Kansas 67530
(620) 792-8231 telephone
(620) 792-2775 facsimile

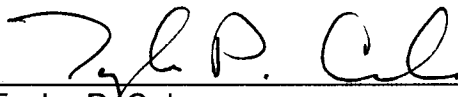
**Attorney for Sunflower Electric
Power Corporation and Mid-Kansas
Electric Company, LLC**

VERIFICATION

STATE OF KANSAS)
COUNTY OF BARTON) ss:

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


That he is an attorney for Sunflower Electric Power Corporation and Mid-Kansas Electric Company, LLC; that he has read the above and foregoing Petition to Intervene and knows the contents thereof; and that the statements contained therein are true.



Taylor P. Calcara

SUBSCRIBED AND SWORN to before me this 3rd day of February, 2016.

Commission Expires: 



Notary Public

CERTIFICATE OF SERVICE

I do hereby certify that on the 3rd day of February, 2016, I electronically filed via the Kansas Corporation Commission's Electronic Filing System a true and correct copy of the above and foregoing Petition to Intervene with a copy e-mailed to:

Reneé K. Braun
Corporate Paralegal, Supervisor

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

GLENDA CAFER, ATTORNEY
CAFER PEMBERTON LLC
3321 SW 6TH ST
TOPEKA, KS 66606
glenda@caferlaw.com

TERRI PEMBERTON, ATTORNEY
CAFER PEMBERTON LLC
3321 SW 6TH ST
TOPEKA, KS 66606
terri@caferlaw.com

ANGELA CLOVEN
EMPIRE DISTRICT ELECTRIC
COMPANY
PO BOX 127
602 S JOPLIN AVENUE
JOPLIN, MO 64802-0127
acloven@empiredistrict.com

W. SCOTT KEITH, DIRECTOR OF
PLANNING AND REGULATORY
EMPIRE DISTRICT ELECTRIC
COMPANY
602 S JOPLIN AVE (64801)
PO BOX 127
JOPLIN, MO 64802
skeith@empiredistrict.com

BRYAN OWENS, ASSISTANT
DIRECTOR OF PLANNING &
REGULATORY
EMPIRE DISTRICT INDUSTRIES, INC.
602 JOPLIN
PO BOX 127
JOPLIN, MO 64802-0127
bowens@empiredistrict.com

ROBERT J. HACK, LEAD REGULATORY
COUNSEL
KANSAS CITY POWER & LIGHT
COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST
(64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679
ROB.HACK@KCPL.COM

ROGER W. STEINER, CORPORATE
COUNSEL
KANSAS CITY POWER & LIGHT
COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST
(64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679
roger.steiner@kcpl.com

MARY TURNER, DIRECTOR,
REGULATORY AFFAIR
KANSAS CITY POWER & LIGHT
COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST
(64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679
MARY.TURNER@KCPL.COM

NICOLE A. WEHRY, SENIOR
PARALEGAL
KANSAS CITY POWER & LIGHT
COMPANY
ONE KANSAS CITY PL, 1200 MAIN ST
(64105)
PO BOX 418679
KANSAS CITY, MO 64141-9679
NICOLE.WEHRY@KCPL.COM

AMBER SMITH, CHIEF LITIGATION
COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604-4027
a.smith@kcc.ks.gov

JEFFREY L. MARTIN, VICE PRESIDENT,
REGULATORY AFFAIRS
KANSAS GAS & ELECTRIC
CO. D/B/A WESTAR ENERGY
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
JEFF.MARTIN@WESTARENERGY.COM

CATHRYN J. DINGES, SENIOR
CORPORATE COUNSEL
WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
cathy.dinges@westarenergy.com

LARRY WILKUS, DIRECTOR, RETAIL
RATES
WESTAR ENERGY, INC.
FLOOR #10
818 S KANSAS AVE
TOPEKA, KS 66601-0889
larry.wilkus@westarenergy.com