

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Joint Application of Sunflower )  
Electric Power Corporation and Southern Pioneer )  
Electric Company for Approval of an Updated ) Docket No. 21-SEPE-047-TAR  
34.5 kV Loss Factor in the Local Access Delivery )  
Service Tariff. )

**PETITION OF KANSAS ELECTRIC POWER**  
**COOPERATIVE, INC. TO INTERVENE**

COMES NOW Kansas Electric Power Cooperative, Inc. (“KEPCo”) and, pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, respectfully petitions the State Corporation Commission of the State of Kansas (“Commission”) for an order permitting it to intervene in the above-captioned docket. In support of its petition, KEPCo states as follows:

1. KEPCo is a corporation duly organized and existing under the laws of the State of Kansas, with its registered office and principal place of business at 600 SW Corporate View, Topeka, Kansas, 66615.

2. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 18 member distribution cooperatives (“Members”) in the state of Kansas pursuant to all-requirements wholesale electric power agreements. KEPCo’s Members serve more than 125,000 retail meters in the eastern two-thirds of Kansas, which equates to approximately 300,000 Kansans.

3. On July 28, 2020, Sunflower Electric Power Corporation (“Sunflower”) and Southern Pioneer Electric Company (“Southern Pioneer”) (collectively, the “Joint Applicants”) filed an application seeking approval of an updated 34.5 kV loss factor in Southern Pioneer’s Local Access Delivery Service (“LADS”) tariff. According to the Joint Applicants, the loss factor is represented by a percentage that, in essence, “trues up” the amount of energy that leaves

the 34.5 kV facilities to the amount that initially entered the 34.5 kV facilities for purposes of billing demand determinants. In other words, the loss factor estimates the true amount of service, in terms of billing demand determinants, that a customer actually takes. Joint Application at ¶ 11. A study was necessary to determine such loss factor because unlike the Sunflower transmission and Southern Pioneer distribution systems, the 34.5 kV facilities are not metered at all distribution substations. According to the Joint Applicants, the absence of metering points at all 34.5 kV input and output locations creates a complex arrangement from a system loss calculation standpoint. Therefore, an engineering model needs to be established that can sufficiently represent all electrical components, loads, and associated losses. Id. at ¶ 13.

4. KEPCo takes service under Southern Pioneer's LADS tariff. Any change to the loss factor associated with Southern Pioneer's 34.5 kV facilities will impact KEPCo. Therefore, KEPCo seeks to intervene in the docket in order to review the filing and determine the impact of the change to the loss factor proposed by the Joint Applicants on KEPCo. KEPCo will comment on the proposed loss factor and the comprehensive loss study as may be necessary to protect its interests.

6. In addition, should the Commission approve the proposed loss factor, KEPCo will be bound by such Commission order and may be adversely affected thereby.

7. Further, KEPCo's interest herein may not be adequately represented by any other party to the proceeding.

8. Thus, KEPCo submits its petition to intervene should be granted without limitation.

9. 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:

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WHEREFORE, for the above and foregoing reasons, KEPCo respectfully requests that the Commission grant its petition to intervene and for such other relief as the Commission deems just and proper.

Respectfully submitted,

/s/ *Susan B. Cunningham*

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

STATE OF KANSAS            )  
  ) ss.  
COUNTY OF SHAWNEE    )

I, Susan B. Cunningham, verify under penalty of perjury that I have caused the foregoing Petition of Kansas Electric Power Cooperative, Inc. to Intervene to be prepared on behalf of Kansas Electric Power Cooperative, Inc.; 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.

*/s/ Susan B. Cunningham*

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Susan B. Cunningham

Executed on this 4<sup>th</sup> day of August, 2020.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing Petition of Kansas Electric Power Cooperative, Inc. to Intervene was electronically served on this 4<sup>th</sup> day of August, 2020, to the following named persons appearing on the Commission's service list as last modified on July 29, 2020:

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/s/ *Susan B. Cunningham*

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