

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

In the Matter of the Application of Western)
Cooperative Electric Association, Inc.)
Seeking Commission Approval to Update) Docket No. 19-WSTE-443-TAR
its Local Access Delivery Service Tariff)
Pursuant to the 34.5 kV Formula Based Rate)
Plan Approved in Docket No. 16-MKEE-)
023-TAR.)

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, LLC (“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 April 26, 2019, Western Cooperative Electric Association, Inc. (“Western”) filed an application with the Kansas Corporation Commission for the purpose of updating its Local Access Delivery Service (LADS) tariff. Expressly, Western proposes to implement a decrease to the LADS demand charge assessed on wholesale users of its 34.5 kV system from \$1.73 per kW to \$1.13 per kW.

4. KPP is one of Western's wholesale local access customers, and, thus, is required to pay the LADS rates under Western's FBR Plan.

5. 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.

6. KPP's interests herein are not adequately represented by any other party, and its intervention will not impair the orderly and prompt conduct of the proceedings.

7. 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
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Amy Fellows Cline (#19995)
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WHEREUPON, KPP prays that the Commission enter an order allowing it to intervene and fully participate in this docket, including but not limited to the right to conduct discovery, file pleadings and testimony, present oral argument, and fully participate in any scheduled hearings, and for all other relief which the Commission deems just and proper.

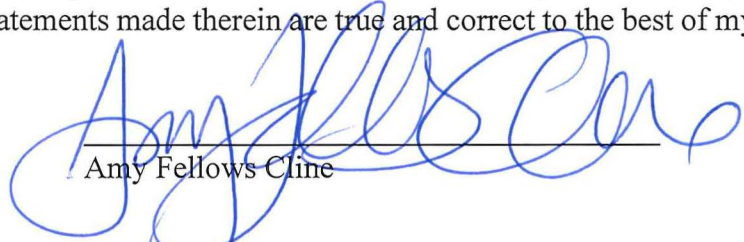
Respectfully submitted:

By: /s/ Amy Fellows Cline
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VERIFICATION

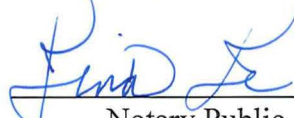
STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

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 2nd day of May, 2019.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of May, 2019, the Petition of the Kansas Power Pool to Intervene was served via electronic mail to:

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/s/ Amy Fellows Cline
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