

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. 91)
Regarding Renewable Energy Standards.)
Docket No. 16-GIME-258-GIE

PETITION TO INTERVENE OF THE EMPIRE DISTRICT ELECTRIC COMPANY

The Empire District Electric Company ("Empire") moves the State Corporation Commission of the State of Kansas ("Commission") for an order permitting it to intervene in the above-captioned matter pursuant to K.S.A. 77-521 and K.A.R. 82-1-225. In support thereof, Empire states as follows:

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 Renewable Energy Standards Act ("RESA") which, in turn, affects the Commission's regulations authorized and required by RESA.

2. Empire is a corporation duly organized and existing under the laws of the State of Kansas and is engaged in doing business in said state. Empire is a holder of a Certificate from the Commission to conduct the business of an electric utility in Kansas and as such will be subject to any changes to the Commission's regulations authorized and required by RESA and amendments thereto.

3. Empire respectfully moves to intervene in the captioned proceeding.

4. All service, pleadings, testimony, briefs and orders for the above-captioned case should be directed to the following:

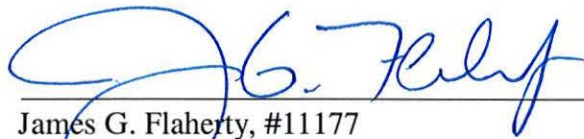
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WHEREFORE, Empire respectfully requests that the Commission issue an order allowing it to intervene and participate in this docket, including but not limited to the right to conduct discovery, file pleadings and testimony, present oral argument, and fully participate in any scheduled hearings, and for such further and other relief as may be appropriate.




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VERIFICATION

STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states that he is attorney for The Empire District Electric Company; that he has read the above and foregoing Petition to Intervene, and the statements contained therein are true.


James G. Flaherty

SUBSCRIBED AND SWORN to before me this 18th day of January, 2016.



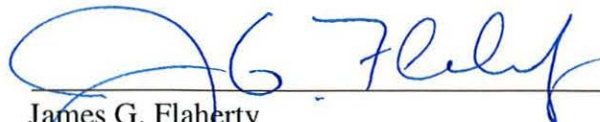

Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Petition to Intervene was sent by electronic mail this 18th day of January, 2016, addressed to:

Amber Smith
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James G. Flaherty