BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of Southern Pioneer Electric)	
Company for Approval of the Continuation of)	Docket No. 26-SPEE-099-RTS
Its Formula Based Ratemaking Plan.)	

PETITION TO INTERVENE

COMES NOW, KPP Energy, A Municipal Energy Agency ("KPP"), 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. KPP's members are located in the Southern Pioneer Electric Company zone.
- 3. On September 17, 2025, Southern Pioneer Electric Company ("Southern Pioneer"), filed an application with the Commission for approval of the continuation of its Formula-Based Rate Plan ("FBR Plan").
- 4. KPP is one of Southern Pioneer's wholesale local access customers, and thus, is required to pay Southern Pioneer's wholesale local access delivery services rates for services over Southern Pioneer's 34.5kV sub-transmission system under the FBR Plan. Furthermore, Southern Pioneer services two KPP member cities, namely, Greensburg and Kingman, as well as the Greensburg Wind Farm.
- 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:

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WHEREUPON, KPP prays that the Commission enter an order allowing it to intervene in this proceeding and for all other relief which the Commission deems just and proper.

Respectfully submitted,

SPENCER FANE LLP

By: /s/ Kendra D. Stacey

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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Kendra D. Stacey, of lawful age, being first duly sworn upon my oath, state that I am one of the attorneys for KPP Energy, A Municipal Energy Agency; 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.

Kendra D. Stacey, #29359

SUBSCRIBED AND SWORN to before me this 22nd day of October, 2025.

Notary Public

My Appointment Expires:

12-20-2028

CERTIFICATE OF SERVICE

26-SPEE-099-RTS

I hereby certify that on this 22nd day of October, 2025, the above Petition to Intervene was served via electronic mail to:

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