

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

In the Matter of the Southern Pioneer)
Electric Company for Approval of the)
Continuation of its Debt Service Coverage) Docket No. 19-SPEE-240-MIS
and 34.5 kV Formula Based Ratemaking)
Plans.)

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 December 20, 2018, Southern Pioneer Electric Company (“SPEC”) filed an application with the Kansas Corporation Commission for approval of the continuation of its Debt Service Coverage and 34.5 kV Formula Based Ratemaking Plans.
4. SPEC owns and operates 34.5 kV sub-transmission facilities that provide service to both SPEC’s retail customers and its wholesale local access customers. The wholesale local access customers’ combined load ration share (approximately 40%) of the total 34.5 kV system

revenue requirement for these facilities is recovered through the Local Access Delivery Service (“LADS”) tariff, where the retail customers’ local ratio share of the total 34.5 kV system revenue requirement is bundled and recovered through the composite retail rate found in SPEC’s respective retail rate schedules.

5. As indicated in SPEC’s Application, SPEC utilizes a 34.5 kV FBR plan for its 34.5 kV LADS and retail rates.

6. SPEC indicates in its Application that it intends to continue utilizing the 34.5 kV FMB plan and intends to file an application and supporting testimonies associated with SPEC’s FBR Plan in this docket.

7. KPP is one of SPEC’s wholesale local access customers, and, thus, is required to pay the LADS rates under SPEC’s FBR Plan.

8. 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.

9. 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.

10. 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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100 North Broadway, Suite L110
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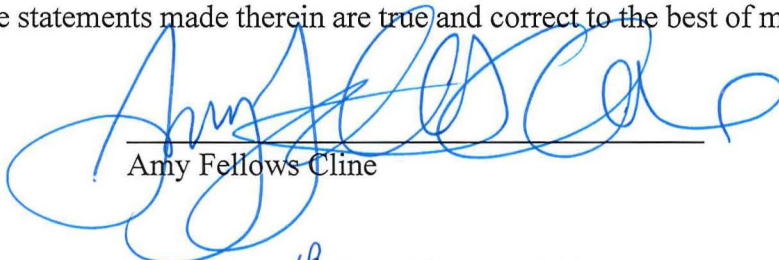
WHEREUPON, KPP prays that the Commission enter an order allowing it to intervene and fully participate in this docket, including but not limited to the right to conduct discovery, file pleadings and testimony, present oral argument, and fully participate in any scheduled hearings, and for all other relief which the Commission deems just and proper.

By: /s/ Amy Fellows Cline
Timothy E. McKee, #7135
Amy Fellows Cline, #19995
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Attorneys for the Kansas Power Pool

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.



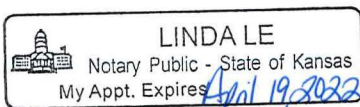
Amy Fellows Cline

SUBSCRIBED AND SWORN to before me this 18 day of January, 2019.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of January, 2019, the Petition of the Kansas Power Pool to Intervene was served via electronic mail to:

<p>Glenda Cafer, Attorney Cafer Pemberton LLC 3321 SW 6th St Topeka, KS 66606 glenda@caferlaw.com</p> <p>Terri Pemberton, Attorney Cafer Pemberton LLC 3321 SW 6th St Topeka, KS 66606 terri@caferlaw.com</p> <p>Thomas J. Connors, Attorney at Law Citizens' Utility Ratepayer Board 1500 SW Arrowhead Rd Topeka, KS 66604 tj.connors@curb.kansas.gov</p> <p>Todd E. Love, Attorney Citizens' Utility Ratepayer Board 1500 SW Arrowhead Rd Topeka, KS 66604 t.love@curb.kansas.gov</p> <p>David W. Nickel, Consumer Counsel Citizens' Utility Ratepayer Board 1500 SW Arrowhead Rd Topeka, KS 66604 d.nickel@curb.kansas.gov</p> <p>Shonda Rabb Citizens' Utility Ratepayer Board 1500 SW Arrowhead Rd Topeka, KS 66604 s.rabb@curb.kansas.gov</p>	<p>Randy Magnison, Executive VP - Assistant CEO Pioneer Electric Coop. Assn., Inc. 1850 W Oklahoma PO Box 368 Ulysses, KS 67880-0368 rmagnison@pioneerelectric.coop</p> <p>Elena Larson, Rate and Financial Analyst Power System Engineering, Inc. 3321 SW 6th Ave Topeka, KS 66606 larsone@powersystem.org</p> <p>Lindsay Campbell, Executive VP - General Counsel Southern Pioneer Electric Company 1850 W Oklahoma PO Box 403 Ulysses, KS 67880-0430 lcampbell@pioneerelectric.coop</p> <p>Stephen J. Epperson, CEO Southern Pioneer Electric Company 1850 W Oklahoma PO Box 403 Ulysses, KS 67880-0430 sepperson@pioneerelectric.coop</p> <p>Richard J Macke, VP & Lead Economics, Rates, and Business Planning Dpt. Southern Pioneer Electric Company 10710 Town Square Dr N. Ste 201 Minneapolis, MM 55449 macker@powersystem.org</p>
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<p>Della Smith Citizens' Utility Ratepayer Board 1500 SW Arrowhead Rd Topeka, KS 66604 d.smith@curb.kansas.gov</p> <p>Carly Masenthin, Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Rd Topeka, KS 66604 c.masenthin@kcc.ks.gov</p> <p>Robert Vincent, Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Rd Topeka, KS 66604 r.vincent@kcc.ks.gov</p>	<p>Chantry Scott, CFO, VP of Finance and Accounting Southern Pioneer Electric Company 1850 West Oklahoma PO Box 403 Ulysses, KS 67880 cscott@pioneerelectric.coop</p>
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/s/ Amy Fellows Cline
Amy Fellows Cline, ##19995