

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Evergy)
Metro, Inc., Evergy Kansas Central, Inc. and)
Evergy Kansas South, Inc. for an) Docket No. 20-EKME-454-ACT
Accounting Authority Order Allowing the)
Companies to Record and Preserve Costs)
Related to COVID-19 Expenses.)

PETITION TO INTERVENE

COMES NOW, Unified School District #259 Sedgwick County, Kansas (hereinafter “USD 259”) and respectfully petitions the Corporation Commission of the State of Kansas (the “Commission”) for an order permitting its intervention and full participation in the captioned proceeding. In support of its Petition, USD 259 states:

I. Background

1. On May 6, 2020, Evergy Kansas Central, Inc. and Evergy Kansas South, Inc., and Evergy Metro, Inc. (collectively referred to as “Evergy”) filed a Joint Application for an Accounting Authority Order (“AAO”) permitting Evergy to accumulate and defer to a regulatory asset for consideration of recovery in proceeding before the Commission certain extraordinary costs and financial impacts incurred as a result of the COVID-19 pandemic.

II. Petition to Intervene

2. USD 259 comprises the Wichita Public School system and is the largest public school system and district in the state of Kansas, serving approximately 51,000 students.

3. USD 259 takes all of its electric service from the Company except for Southeast High School. USD 259 maintains 106 buildings, approximately 140 electric meters, and consumed approximately 93,300,000 kilowatt hours of electricity supplied by the Company at a cost of \$7,769,832.00 in the last fiscal year.

4. Public schools are classified as their own rate class. USD 259 is part of the public schools rate class and is the largest school district in the state of Kansas. It appears that no other customer taking electric service under the public schools rate class has intervened or sought to intervene in this case to date. Therefore, no other party can adequately represent the unique interests of USD 259 in these proceedings.

5. Public schools (including USD 259) will be bound by any Commission order or activity in this proceeding. The rates paid and the services received by public schools may be substantially affected by any Commission order or activity in this proceeding with respect to the proposed recovery of certain costs by the Company through their proposed AAO order, as described in the Company's Application.

6. The future workforce of the state of Kansas will be filled by many of today's 51,000 students in the Wichita Public Schools. Students today are tomorrow's workers, customers, and owners of local business. The quality of education provided to Wichita Public School students is crucial to future economic vitality in Wichita and the state of Kansas. It is one of the missions of the Wichita Public Schools to produce students that meet workforce needs of today's and tomorrow's world. Any electric rates above cost of service divert increasingly scarce and limited public school funds away from the classroom and hinder these efforts. The electric rates paid and services received by USD 259 will be substantially impacted by any order entered by the Commission herein. USD 259 requests permission to intervene in this docket.

7. USD 259 requests the right to participate in all aspects of this Docket. The interests of justice will be served and the orderly and prompt conduct of these proceedings will not be impaired by allowing the intervention of USD 259 to participate therein.

8. In addition to the undersigned counsel, please include the following USD 259 representatives with all electronic notices, pleadings, and correspondence regarding this Application:

Tom Powell
General Counsel — USD 259
903 South Edgemoor, Suite 113
Wichita, KS 67218
tpowell@usd259.net

WHEREFORE, USD 259 respectfully requests that the Commission enter an order granting it full participation in the captioned proceedings.

Respectfully submitted,

TRIPLETT WOOLF GARRETSON, LLC

By /s/Timothy E. McKee

Timothy E. McKee, #07135
Amy Fellows Cline, #19995
Attorneys for USD 259

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

I, Thomas R. Powell, of lawful age, being first duly sworn, upon oath states: I am General counsel for USD 259, and I have read the above Petition to Intervene and know the contents and know that the statements made therein are true and correct, to the best of my knowledge and belief.

Thomas R. Powell

Printed Name: THOMAS R. POWELL
Date: 5-29-2020

SUBSCRIBED AND SWORN to before me on this 29th day of MAY, 2020.



Terril L. Brooks

Notary Public

My Commission Expires: 4-17-2023

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 28th day of May, 2020, to the following:

JOSEPH R ASTRAB, ATTORNEY
CITIZENS' UTILITY RATEPAYOR BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
j.strab@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYOR BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYOR BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.love@curb.kansas.gov

CATHRYN J. DINGES,
CORPORATE COUNSEL
EVERGY KANSAS CENTRAL, INC.
818 S. KANSAS AVE.
P.O. BOX 889
TOPEKA, KS 66601-0889
Cathy.Dinges@evergy.com

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYOR BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.NICKEL@CURB.KANSAS.GOV

COLE BAILEY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD.
TOPEKA, KS 66604
c.bailey@kcc.ks.gov

SHONDA RABB
CITIZENS' UTILITY RATEPAYOR BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
s.rabb@curb.kansas.gov

TERRI PEMBERTON,
CHIEF LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.pemberton@KCC.KS.GOV

PHOENIX ANSCHUTZ,
ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
p.anschutz@kcc.ks.gov

JAMES P. ZAKOURA
SMITHYMAN & ZAKOURA, CHARTERED
750 COMMERCE PLAZA II BLDG
7400 WEST 110TH ST.
OVERLAND PARK, KS 66210-2362
jim@smizak-law.com

/s/Timothy E. McKee
Timothy E. McKee, #07135