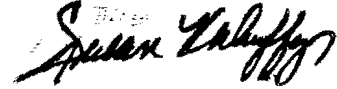


**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Thomas E. Wright, Chairman
Joseph F. Harkins
Ward Loyd

STATE CORPORATION COMMISSION

JAN 04 2011



In the Matter of the Application of)
Mid-Kansas Electric Company, LLC)
for Approval to Make Certain)
Changes in its Charges for Electric)
Service)

Docket No. 11-MKEE-439-RTS

PETITION 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 permitting it to intervene in the above captioned matter. In support of its Petition, KPP alleges and states as follows:

1. KPP is a municipal energy agency organized and operated under the Municipal Energy Agencies Act, K.S.A. 12-885 et seq and consists of forty one (41) Kansas municipalities.

2. Attached hereto and incorporated herein by reference is Attachment A, which consists of a list of the KPP member cities.

3. On December 14, 2010 Mid-Kansas Electric Company, LLC (“Mid-Kansas”) filed an application with the Kansas Corporation Commission for approval to make certain changes in its charges for electric service. Specifically in this filing, Mid-Kansas reflects changes in its rates that it alleges reflect the cost of service for Mid-Kansas’ customers within its designated geographic certificated service territory, which

are based on the cost to Mid-Kansas for service rendered by Wheatland Electric, under the terms of a certain service agreement.

4. KPP is requesting intervention in this docket pursuant to K.A.R. 82-1-225 to represent the interests of KPP and the interests of its member cities, that utilizes the transmission system of Mid-Kansas and/or Wheatland Electric to serve its member cities and because a decision in this docket can and will affect KPP's member cities that receive KPP service over the Mid-Kansas, Wheatland Electric, transmission system, particularly as it relates to the cities of Attica and Kingman. The rates paid and the services received by KPP member cities will be affected by any Commission order in this proceeding.

5. KPP specifically desires to point out in its intervention that the Stipulation and Agreement entered into in Docket No. 09-MKKEE-969-RTS did not include territories served by Wheatland Electric.

6. The representation of KPP's interests in this proceeding will not be protected by any other party. KPP is qualified as an intervenor under K.A.R. 82-1-225.

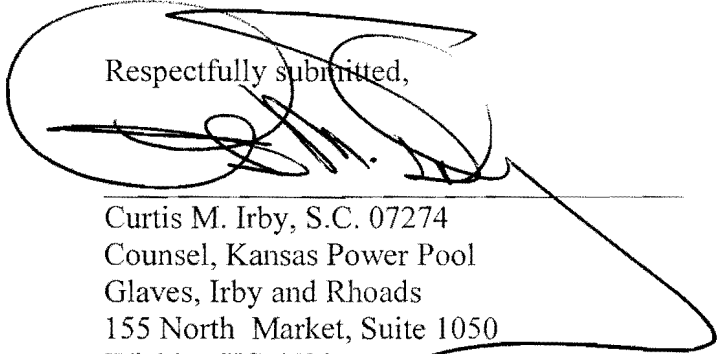
7. KPP notifies the Commission, CURB and Mid-Kansas that it objects to and does not waive the rate filing requirements of K.A.R. 82-1-231 or Mid-Kansas' utilization of Schedule I of the Order in 09-MKKEE-816-MIS in the alternative.

8. Likewise, KPP objects to the Applicant not filing the historical information required as part of a rate filing under K.A.R. 82-1-231; particularly the historical data pertaining to the three (3) calendar years immediately preceding the test year, which is most relevant to the current proceedings.

9. KPP and its member cities will be bound by any Commission order issued in this docket and may or will be adversely affected thereby.

WHEREFORE, KPP respectfully requests that the Commission grant its Petition
for Intervention in this docket.

Respectfully submitted,

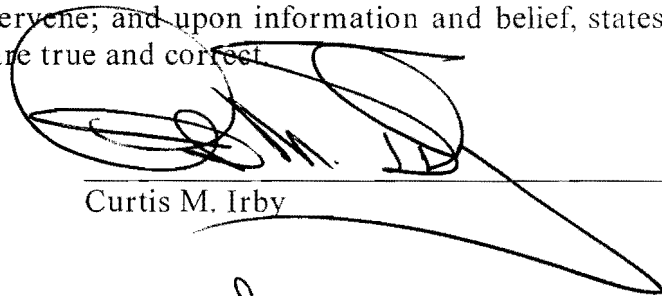


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VERIFICATION

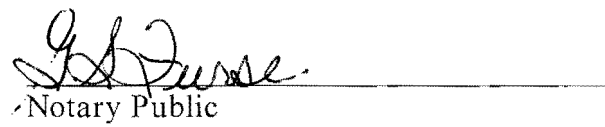
STATE OF KANSAS)
)
) ss:
COUNTY OF SEDGWICK)

I, Curtis M. Irby, of lawful age, being first duly sworn on his oath deposes and states that he is the attorney for the above named Petitioner; that he read the above and foregoing Petition to Intervene; and upon information and belief, states that the matters therein appearing are true and correct.



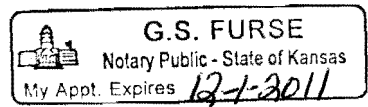
Curtis M. Irby

SUBSCRIBED AND SWORN to before me on this 4th day of January, 2011.



Notary Public

My Appointment Expires: December 1, 2011



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the original and seven copies of the above and foregoing was placed in the United States mail, postage prepaid, e-mailed or hand-delivered this 4th day of January, 2011, to the following:

Niki Christopher
Attorney
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604

Terri Pemberton
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

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Great Bend, KS 67530

Lindsay A. Shepard, Attorney
Watkins Calcara Chtd.
PO Drawer 1110
Great Bend, KS 67530

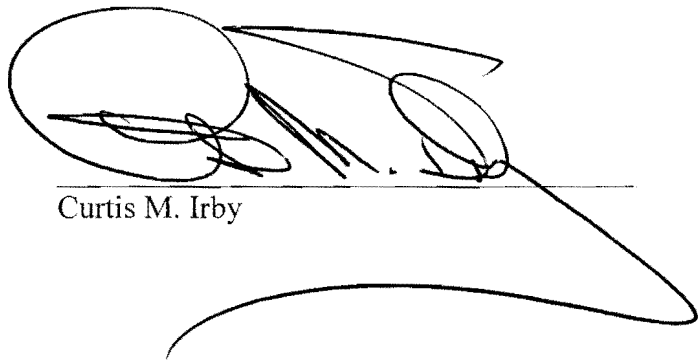
David Springe
Citizens Ratepayer Utility Board
1500 SW Arrowhead Road
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Steve Rarrick
Citizens Ratepayer Utility Board
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Della Smith
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604

Shonda Smith
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604

L. Earl Watkins
President and CEO
Mid-Kansas Electric Company, LLC
P. O. Box 980
Hays, KS 67601

A handwritten signature in black ink, appearing to read "Curtis M. Irby". The signature is written over a horizontal line. The ink is dark and the strokes are fluid and somewhat cursive. There is a large, sweeping flourish that extends from the end of the signature down and to the right.

Curtis M. Irby

EXHIBIT A

The members of the Kansas Power Pool are the following cities: The city of Arcadia, Kansas, the city of Attica, Kansas, the city of Augusta, Kansas, the city of Burlingame, Kansas, the city of Burlington, Kansas, the city of Centralia, Kansas, the city of Chanute, Kansas, the city of Chapman, Kansas, the city of Clay Center, Kansas, the city of Ellinwood, Kansas, the city of Erie, Kansas, the city of Fredonia, Kansas, the city of Girard, Kansas, the city of Glasco, Kansas, the city of Greensburg, Kansas, the city of Haven, Kansas, the city of Hillsboro, Kansas, the city of Holton, Kansas, the city of Holyrood, Kansas, the city of Horton, Kansas, the city of Iola, Kansas, the city of Kingman, Kansas, the city of Larned, Kansas, the city of Lucas, Kansas, the city of Luray, Kansas, the city of Marion, Kansas, the city of Minneapolis, Kansas, the city of Mount Hope, Kansas, the city of Neodesha, Kansas, the city of Osborne, Kansas, the city of Oxford, Kansas, the city of Sabetha, Kansas, the city of Scranton, Kansas, the city of Seneca, Kansas, the city of St. Marys, Kansas, the city of Stafford, Kansas, the city of Sterling, Kansas, the city of Stockton, Kansas, the city of Udall, Kansas, the city of Wellington, Kansas and the city of Winfield, Kansas.