

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

FEB 15 2013

In the Matter of Midwest Energy )  
Inc.'s Compliance )  
With the Commissions's Order in )  
Docket No. 13-GIME-391-GIE )

by  
State Corporation Commission  
of Kansas

Docket No. 13-MDWE-466-CPL

**PETITION TO INTERVENE OF  
SOLAR ENERGY INDUSTRIES ASSOCIATION - HEARTLAND CHAPTER**

COMES NOW, Solar Energy Industries Association - Heartland Chapter (hereinafter "HSEIA") and pursuant to K.A.R. 82-1-225 petitions the Commission for an Order granting it leave to intervene as a party with full rights of participation in this matter. In support of the Petition, HSEIA states as follows:

1. HSEIA is a not for profit corporation and authorized to conduct business within the State of Kansas. (See Exhibit A, attached.) HSEIA advocates for the development of solar energy projects in the three states of Kansas, Nebraska, and Iowa. The mailing address for HSEIA is 8214 West 75th Street, Overland Park, KS 66204.

2. HSEIA membership is composed of various businesses engaged in the development, sale, and installation of solar energy systems. HSEIA and its members stand to be affected by the report, if any, produced through the investigation in this docket.

3. HSEIA therefore has legal rights and economic interests that will be substantially affected by this proceeding.

4. HSEIA expressly states that it anticipates participating in additional issues not stated in this petition, and that the interests described in this petition are illustrative of HSEIA's interest in this proceeding, and further that the discussion of issues in this petition is not intended as an exclusive expression of all issues to be addressed by HSEIA.

6. Service of pleadings, notices, and other correspondence in this matter may be sent to:

C. Edward Peterson  
Reed Bartels  
Finnegan, Conrad & Peterson, L.C.  
1209 Penntower Office Building  
3100 Broadway  
Kansas City, Missouri 64111  
(816) 753-1122  
(816) 756-0373 (Fax)  
email: [epeters@fcplaw.com](mailto:epeters@fcplaw.com)

7. HSEIA's interests are not represented by any other party to this proceeding. No prejudice to any party will result from granting the relief requested herein, nor will the orderly conduct of proceedings be impaired if HSEIA is allowed to intervene.

WHEREFORE, HSEIA respectfully requests the Commission to enter an order granting it leave to intervene as a party to this proceeding with full rights to participate, present evidence in support of its positions, cross examine witnesses of other parties, participate in all pretrial conferences and settlement discussions, conduct relevant discovery, and receive notice of and attend such other proceedings as the Commission or its staff may conduct during the pendency of this proceeding.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.,


By:  \_\_\_\_\_

REED BARTELS KS # 22490  
C. EDWARD PETERSON KS #11129  
1209 Penntower Office Center  
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Kansas City, MO 64111  
(816) 753-1122  
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ATTORNEYS FOR HSEIA, INC.

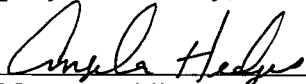
Verification

State of Missouri            )  
  )  
County of Jackson         )        ss

Comes now the undersigned and upon oath first duly sworn states that he has read the foregoing pleading, he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
C. Edward Peterson

Subscribed and sworn to before me this 14 day of February, 2013.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 9-22-13

ANGELA C. HEDGES  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Jackson County  
My Commission Expires: September 22, 2013  
Commission Number: 09402477

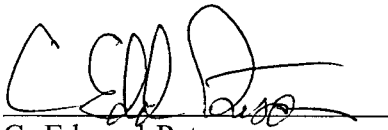
Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Petition to Intervene was served by United States mail, and by electronic mail where noted, this 15<sup>th</sup> day of February, 2013, to the following parties who have waived receipt of follow-up hard copies:

David Springe  
Niki Christopher  
Steven Rarick  
Shonda Smith  
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