

Received  
on

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

JAN 10 2013

by  
State Corporation Commission  
of Kansas

In the Matter of the Application of Mid-Kansas )  
Electric Company, LLC for Approval of a Debt ) Docket No. 13-MKEE-452-MIS  
Service Coverage Ratemaking Pilot Plan for the )  
Geographic Territory Served by Its Member- )  
Owner Southern Pioneer Electric Company. )

**PETITION TO INTERVENE**

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and moves the Corporation Commission of the State of the Kansas ("Commission") for an order permitting it to intervene in the above-captioned proceeding. In support of its petition, CURB states and alleges as follows:

1. CURB is composed of five volunteer consumer advocate members and is statutorily authorized to represent the interests of Kansas residential and small commercial ratepayers in utility proceedings.

2. CURB's Consumer Counsel has been given the discretion to intervene and represent the interests of Kansas residential and small commercial ratepayers in any utility proceeding before the Commission under K.S.A. 66-1223 et seq.

3. On January 08, 2013, Mid-Kansas Electric Company, LLC filed an application with the Kansas Corporation Commission for Approval of a Debt Service Coverage Ratemaking Pilot Plan for the Geographic Territory Served by Its Member-Owner Southern Pioneer Electric Company.

4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. The rates paid and the service received by those customers will or may be affected by any Commission order or activity in this proceeding.

5. In addition to undersigned counsel, please include the following CURB

representatives with all electronic notices, pleadings, and correspondence regarding this Application as follows:

Shonda Smith  
Office Manager  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Road  
Topeka, KS 66604  
Email: [sd.smith@curb.kansas.gov](mailto:sd.smith@curb.kansas.gov)

Della Smith  
Administrative Specialist  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Road  
Topeka, KS 66604  
Email: [d.smith@curb.kansas.gov](mailto:d.smith@curb.kansas.gov)

6. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

7. The residential and small commercial ratepayers whose interests CURB represents will or may be bound by any Commission order or activity in this proceeding and will or may be adversely affected thereby.

WHEREFORE, CURB RESPECTFULLY REQUESTS THE Commission grant its Petition for Intervention in this Docket.

Respectfully submitted,



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David Springe #15619  
C. Steven Rarrick #13127  
Niki Christopher #19311  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Road  
Topeka, KS 66604  
(785) 271-3200  
(785) 271-3116 Fax

VERIFICATION

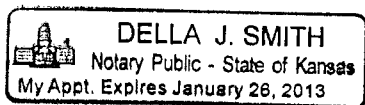
STATE OF KANSAS    )  
  )  
COUNTY OF SHAWNEE                                    )            ss:

I, David Springe, of lawful age, being first duly sworn upon his oath states:

That he is an attorney for the above named petitioner; that he has read the above and foregoing Intervention, and, upon information and belief, states that the matters therein appearing are true and correct.

  
\_\_\_\_\_  
David Springe

SUBSCRIBED AND SWORN to before me this 10<sup>th</sup> day of January, 2013.



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

My Commission expires: 01-26-2013.

**CERTIFICATE OF SERVICE**

13-MKEE-452-MIS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 10<sup>th</sup> day of January, 2013, to the following:

RAY BERGMEIER, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD ROAD  
TOPEKA, KS 66604-4027  
\*\*Hand Delivered\*\*

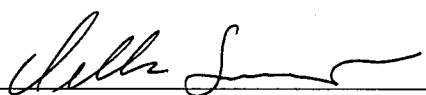
DON GULLEY, VP, Regulatory and Market Affairs  
MID-KANSAS ELECTRIC COMPANY, LLC  
301 WEST 13TH STREET  
PO BOX 980  
HAYS, KS 67601

RANDY MAGNISON  
EXECUTIVE VICE PRESIDENT  
SOUTHERN PIONEER ELECTRIC COMPANY  
P.O. BOX 430  
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