

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

JAN 3 2012

by
State Corporation Commission
of Kansas

In the Matter of the Application of)
Mid-Kansas Electric Company, LLC for)
Approval to Make Certain Changes in its) Docket No. 12-MKEE-380-RTS
Charges for Electric Services in the)
Geographic Service Territory Served by)
Southern Pioneer Electric Company)

**RESPONSE OF MID-KANSAS TO PETITION TO INTERVENE
OF KANSAS ELECTRIC POWER COOPERATIVE, INC.**

Mid-Kansas Electric Company, LLC (Mid-Kansas) hereby responds to Kansas Electric Power Cooperative, Inc.'s (KEPCo) petition to intervene and states the following:

1. On December 20, 2011, Mid-Kansas filed its Application to make certain changes in its charges for electric service in the geographic service territory served by Southern Pioneer Electric Company (Southern Pioneer). As part of its Application Mid-Kansas seeks to make changes to the local access charge (LAC) associated with the services provided by its member Southern Pioneer.

2. On December 30, 2011, KEPCo filed its Petition to Intervene (Petition). In support of its Petition, KEPCo stated that it is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to Kansas customers.

3. KEPCo further stated that it delivers electric service to two of its members through delivery points on the 34.5 kV system owned and operated by Southern Pioneer, and as such will be affected by a change in the LAC.

4. Mid-Kansas recognizes that KEPCo has an interest in matters related to the LAC. However, because KEPCo does not take retail service from Mid-Kansas it has no interest in this

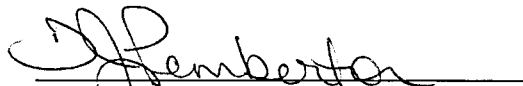
proceeding as it pertains to the changes in retail service and related charges proposed for the Southern Pioneer service area.

5. Therefore, Mid-Kansas has no objection to KEPCo's intervention in this matter provided the intervention is limited to issues related to the LAC.

WHEREFORE, Mid-Kansas respectfully requests the Commission limit the intervention of KEPCo to matters related to the local access charge.

Respectfully submitted,

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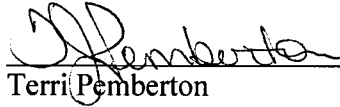


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**COUNSEL FOR MID-KANSAS ELECTRIC
COMPANY, LLC**

VERIFICATION

I verify under penalty of perjury that the foregoing document entitled *Response of Mid-Kansas to Petition to Intervene of Kansas Electric Power Cooperative, Inc.* is true and correct to the best of my knowledge and belief.



Terri Pemberton
Counsel for Mid-Kansas Electric Company, LLC
[Prepared in Accordance with K.S.A. 53-601]

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above *Response of Mid-Kansas* was electronically served, hand-delivered or mailed, postage prepaid, this 3rd day of January, 2012 to:

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