

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners:

John Wine, Chair
Cynthia L. Claus, Commissioner
Brian J. Moline, Commissioner

FEB 01 2002

Jeffery S. Wasaman Docket
Room

In the Matter of the Filing of Written)
Documents and Gas Purchase Reports by) Docket No. 02-MDWG-517-GPR
Midwest Energy, Inc. as Prescribed by)
Commission Order dated June 21, 2001 in)
Docket No. 106,850-U/75-GIMC-099-GIG.)

PETITION FOR LEAVE TO INTERVENE

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and moves the Kansas State Corporation Commission ("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. On January 9, 2002, Midwest Energy, Inc. filed their request for the Kansas Corporation Commission to open a formal docket specific to Midwest Energy, Inc. for the purpose of filing future Gas Purchase Reports, establishment of annual gas portfolio reviews, and other matters as required by the terms with the Order issued by the Commission in KCC Docket No. 106,850-U on June 21, 2001.
3. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers in the area described in the above caption. The rates paid and service received by those customers will or may be affected by the Commission order in this proceeding.
4. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.
5. The residential ratepayers and small businesses whose interests CURB represents will or may be bound by a Commission order 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

A handwritten signature in black ink, appearing to read 'nh ch', is written over a horizontal line.

Walker Hendrix #08835
Niki Christopher # 19311
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604


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W. L.

Veronica E. Runnels

VERMONA E. RUNNEBAUM
Notary Public - State of Kansas
My Appt. Expires 2-18-2002

CERTIFICATE OF SERVICE

I, Walker Hendrix, hereby certify a true and correct copy of the foregoing Intervention,
was placed in the United States mail, postage pre-paid on this 1st day of
Feb., 2002 to

Otto Newton
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604
** Hand Delivered **

Les Munsch
Energy and Transportation Coordinator
Midwest Energy
P.O. Box 898
Hays, KS 67601



Niki Christopher