

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

In the Matter of the Joint Application of)
Mid-Kansas Electric Company, LLC,)
Lane-Scott Electric Corporation, Inc.,)
Prairie Land Electric Cooperative, Inc.,)
Southern Pioneer Electric Company,)
Victory Electric Cooperative Association,)
Inc., Western Cooperative Electric)
Association, Inc., and Wheatland Electric)
Cooperative, Inc., Joint Applicants for an)
Order Approving the Transfer of)
Certificates of Convenience with Respect)
to all of Mid-Kansas' Retail Electric)
Service and for Other Related Relief.)

Docket No. 13-MKEE-447-MIS



Received
on

JAN 22 2013

by
State Corporation Commission
of Kansas

PETITION TO INTERVENE

COMES NOW, the Western Kansas Industrial Electric Consumers ("WKIEC") 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, WKIEC states and alleges as follows:

1. WKIEC is a voluntary association of Western Kansas Industrial consumers which represents the interests of those consumers in utility proceedings. Attached hereto and incorporated herein by reference is a list of those industrial consumers and the individual distribution cooperatives or company that provides them with electric service (Appendix A).

2. On January 7, 2013, Mid-Kansas Electric Company, LLC ("MKEC") and its six cooperative member owners as well as Southern Pioneer Electric Company filed a Joint Application with the Kansas Corporation Commission for an Order approving the transfer of certificates of Convenience with respect to all of Mid-Kansas' retail electric services and for other related relief.

3. WKIEC is requesting permission to intervene in this docket to represent the interests of large industrial customers that are rate payers in these proceedings. The transfer of these certificates

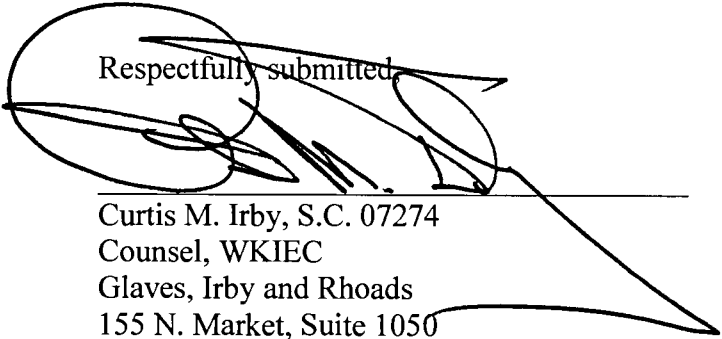
changes from MKEC to its respective individual members the obligation and right to serve the respective members of WKIEC. Likewise, this is a part of the process which started in 2005 in Docket No. 06-MKKEE-524-ACQ. These parties were intervenors in that docket. That docket and other Commission Orders entered since that time have direct bearing upon the instant proceedings.

4. The representation of WKIEC's interests in this proceeding by existing parties is or may be inadequate and no other party will represent the interests of large industrial customers, except for WKIEC.

5. Large industrial ratepayers, whose interests WKIEC represents, will be bound by any Commission Order or activity in this proceeding and will or may be adversely affected thereby. Likewise, the Orders of the Commission in this docket could in some instances be the last Commission review and oversight over these companies as they have expressed a desire to deregulate per Kansas law.

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

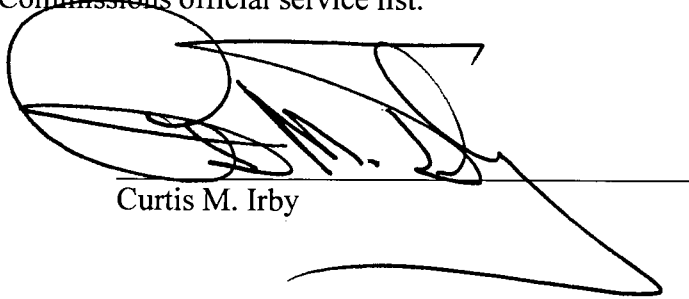
Respectfully submitted,



Curtis M. Irby, S.C. 07274
Counsel, WKIEC
Glaves, Irby and Rhoads
155 N. Market, Suite 1050
Wichita, Kansas 67202
Telephone: 316-262-5181
Email: cmirby@sbcglobal.net

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 22nd day of January, 2013, to the parties on the Commissions official service list.

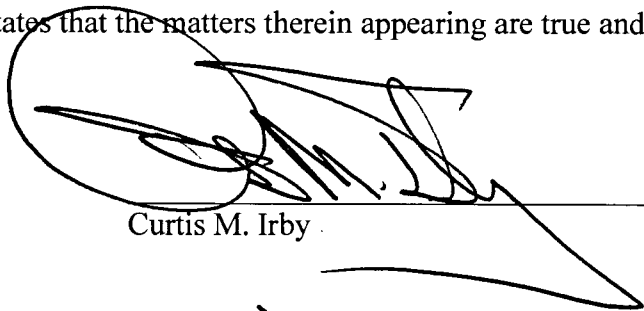


Curtis M. Irby

VERIFICATION

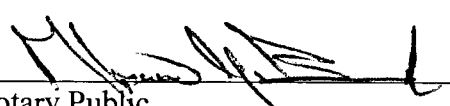
STATE OF KANSAS)
)SS
COUNTY OF SEDGWICK)

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 2nd day of January, 2013.



Notary Public
My Appointment Expires: Dec. 17, 2016

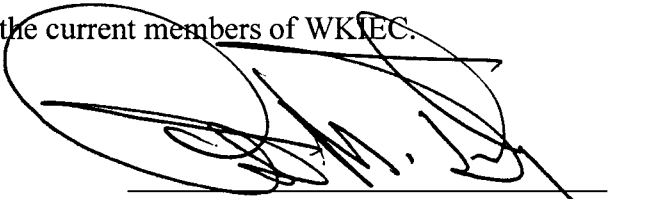


APPENDIX A

At the present time, the Western Kansas Industrial Electric Consumers group ("WKIEC") consists of the following participants, listed by name and reflects the name of the distribution cooperative from which the company takes service:

PARTICIPANT:	SUPPLYING COOPERATIVE:
AIR PRODUCTS AND CHEMICALS, INC.	Southern Pioneer Electric Company
CARGILL INCORPORATED	Victory Electric Cooperative Association, Inc.
DCP MIDSTREAM, LLC (National Helium)	Southern Pioneer Electric Company
LINDE, INC.	Western Cooperative Electric Association, Inc.

I certify that the above list reflects the current members of WKIEC.



Curtis M. Irby
Attorney for WKIEC

LAW OFFICES OF
GLAVES, IRBY AND RHOADS
100 BOARD OF TRADE CENTER
120 SOUTH MARKET
WICHITA, KANSAS 67202

JACK GLAVES
CURTIS M. IRBY
THOMAS M. RHOADS
DIANA G. EDMISTON of Counsel

PHONE: 316-262-5181
FAX: 316-264-6860
E-MAIL: cmirby@sbcglobal.net

January 22, 2013

*Via Ups and Facsimile
(785)*

Patty Petersen-Klein, Executive Director
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, Kansas 66604

Received
on

JAN 22 2013

Re: WKIEC's Petition to Intervene
KCC Docket No. 13-MKEE-447-MIS

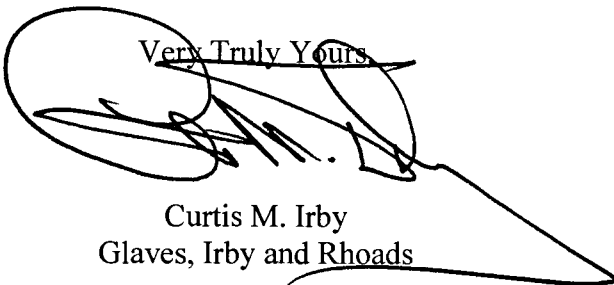
by
State Corporation Commission
of Kansas

Dear Ms. Petersen-Klein:

Enclosed herewith for filing, please find an original and seven (7) copies of the above referenced Petition to Intervene, Verification and Certificate of Service filed by WKIEC in the above matter. Please return one copy, after file stamping the same, in the enclosed self-addressed envelope.

As always, if you have any questions please do not hesitate to call. Thank you in advance for your time and trouble in handling this matter on our behalf.

Very Truly Yours,



Curtis M. Irby
Glaves, Irby and Rhoads

CMI:gmb

cc: All parties on the official service list