

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Received
on

FEB 13 2012

by
State Corporation Commission
of Kansas

In the Matter of the Application of Mid-Kansas)
Electric Company, LLC for Approval to Make) Docket No. 12-MKEE-491-RTS
Certain Changes in its Charges for Electric)
Services in the Geographic Service Territory)
Served by Western Cooperative Electric)
Association Inc.)

**CURB OBJECTION TO MID-KANSAS'
REQUEST FOR AN EXPEDITED ORDER**

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and files its objection to the request of Mid-Kansas Electric Company, LLC ("Mid-Kansas") for the Commission to issue an expedited order within ninety (90) days of the filing of its application in the above captioned docket.

In support of its objection, CURB states as follows:

1. On January 3, 2012, Mid-Kansas, Staff and the Citizens' Utility Ratepayer Board ("CURB") filed a joint petition for a waiver of certain filing requirements of K.A.R. 82-1-231 and to permit Mid-Kansas to file its application using a modified process previously used by other Mid-Kansas Members. The Commission granted the requested waiver on January 25, 2012.

2. Mid-Kansas filed its application on February 1, 2012. In its application, Mid-Kansas requested expedited treatment of its application, specifically requesting an order from the Commission within 90 days of filing of the application, or by May 1, 2012.

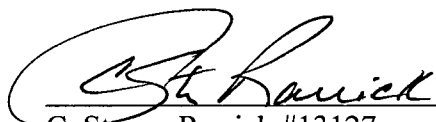
3. CURB opposes Mid-Kansas' request for an expedited order on or before May 1, 2012. Requiring an expedited order on or before May 1, 2012 will not provided sufficient time for parties to this proceeding, including CURB, to conduct a review of the application, file testimony, conduct good faith settlement negotiations, and attend and present information and evidence at the

public hearing and evidentiary hearing (if required) in this docket. The Company's request likewise denies the Commission adequate time to schedule a public hearing and the evidentiary hearing with sufficient time to consider the evidence and issue an order.

3. The Company's request for an expedited order date of May 1, 2012 ignores the reality of reviewing and investigating a rate increase request by a public utility. The Company's request would effectively deny parties their due process rights to investigate and respond to the Company's February 1, 2012 application for a rate increase.

WHEREFORE, CURB respectfully requests that the Commission deny the Company's request for an expedited order date of May 1, 2012.

Respectfully submitted,



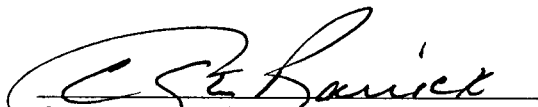
C. Steven Rarrick #13127
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

VERIFICATION

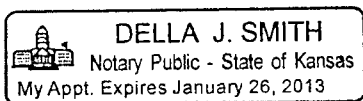
STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, C. Steven Rarrick, 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.


C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 13th day of February, 2012.




Notary Public

My Commission expires: 01-26-2013.

CERTIFICATE OF SERVICE

12-MKEE-491-RTS

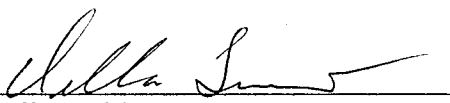
I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 13th day of February, 2012, to the following:

HOLLY FISHER, ATTORNEY
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
** Hand Delivered**

MATTHEW SPURGIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
** Hand Delivered**

MARK D. CALCARA, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN STREET SUITE 300
PO DRAWER 1110
GREAT BEND, KS 67530

LINDSAY A. SHEPARD, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN STREET SUITE 300
PO DRAWER 1110
GREAT BEND, KS 67530



Della Smith
Administrative Specialist