

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a Joint Application of Mid-)
Kansas Electric Company, LLC, Prairie)
Land Electric Cooperative, Inc., Southern)
Pioneer Electric Company, The Victory)
Electric Cooperative Association, Inc., and)
Western Cooperative Electric Association,)
Inc., for Approval of Individual 34.5 kV)
Formula Based Rates.)

Docket No. 16-MKEE-023-TAR

PETITION TO INTERVENE

COMES NOW the Western Kansas Industrial Electric Consumers Group (“WKIEC”) and herby 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 July 16, 2015, the applicants, and each of them, filed their joint Application for Commission Approval of individual 34.5 kV Formula-Based Rate.

3. WKIEC is requesting permission to intervene in this Docket to represent the interests of the large industrial customers: Cargill, Inc. served by Victory Electric Cooperative Association, Inc.; Linde, Inc. served by Western Cooperative Electric Association, Inc.; DCP Midstream, L.L.C. and Air Products & Chemicals, Inc. served by Southern Pioneer Electric Company. Although the WKIEC members taking 34.5 kV service are retail customers, they pay Local Access charges that will be affected by this filing. Accordingly, they have a justifiable interest in the outcome of this proceeding.

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

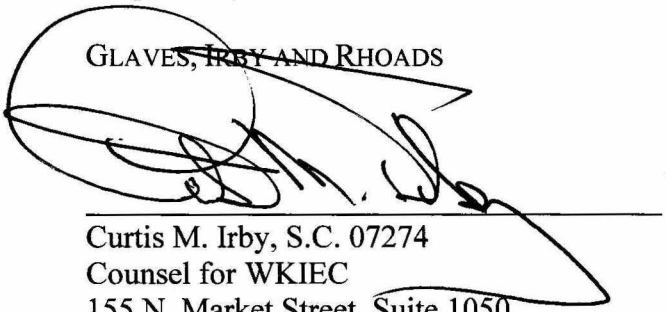
5. Large industrial ratepayers, whose interests WKIEC represents, will be bound by any Commission Order or activity in this proceeding and will or may be adversely affected thereby.

6. In addition to the undersigned, copies of pleadings, documents and correspondence in this docket should be sent to:

Jeffrey L. Pollock
J. Pollock, Incorporated
12647 Olive Boulevard
St. Louis, Missouri 63141
email: jcp@pollockinc.com

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

Respectfully submitted,



~~GLAVES, IRBY AND RHOADS~~

Curtis M. Irby, S.C. 07274
Counsel for WKIEC
155 N. Market Street, Suite 1050
Wichita, Kansas 67202
Telephone: (316) 262-5181
Facsimile: (316) 264-6860
email: cmirby@sbeglobal.net

VERIFICATION

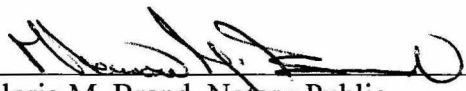
STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

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 to the best of his knowledge, information and belief.

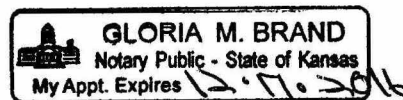


Curtis M. Irby

Subscribed and sworn to before me
this 11th day of August, 2015.




Gloria M. Brand, Notary Public
My Commission Expires: December 17, 2016



CERTIFICATE OF SERVICE

Curtis M. Irby, the undersigned, hereby certifies that the original of the above and foregoing was e-filed with the Kansas Corporation Commission via their official this 11th day of August, 2015, and thus served on the parties stated on the Commission's official service list.



Curtis M. Irby

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
Inc.

Victory Electric Cooperative Association,

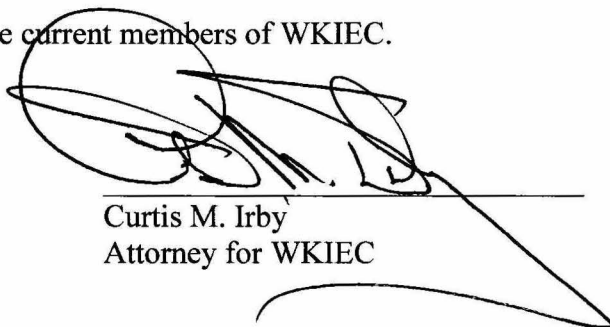
DCP MIDSTREAM, LLC
(National Helium)

Southern Pioneer Electric Company

LINDE, INC.
Inc.

Western Cooperative Electric Association,

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



Curtis M. Irby
Attorney for WKIEC