

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: Brian J. Moline, Chair
Robert E. Krehbiel
Michael C. Moffet

MAR 27 2006

 Docket Room

In the Matter of the Application of Midwest)
Energy, Inc. for Approval to Make Certain) Docket No. 06-MDWG-1027-RTS
Changes in its Charges for Gas Service.)

PETITION TO INTERVENE

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and moves the Corporation Commission of the State of the Kansas ("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. CURB's Consumer Counsel has been given the discretion to intervene and represent the interests of Kansas residential and small commercial ratepayers in any utility proceeding before the Commission under K.S.A. 66-1223 et seq.
3. On March 24, 2006, Midwest Energy, Inc. ("Midwest Energy" or "Applicant") filed an application with the Kansas Corporation Commission for the purpose of making changes to their charges for gas service.
4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. The rates paid and the service received by those customers will or may be affected by any Commission order or activity

in this proceeding.

5. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

6. The residential and small commercial ratepayers whose interests CURB represents will or may be bound by any Commission order or activity 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.

Respectfully submitted,

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

David Springe #15619

Niki Christopher #19311

C. Steven Rarrick #13127

Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

Topeka, KS 66604

(785) 271-3200

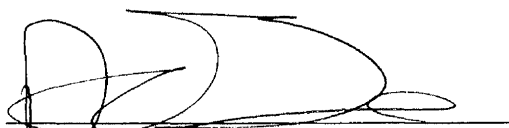
(785) 271-3116 Fax

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, David Springe, of lawful age, being first duly sworn upon his oath states:

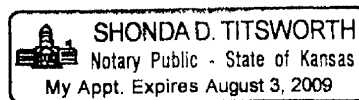
That he is an attorney for the above named petitioner; that he has read the above and foregoing Intervention, and, upon information and belief, states that the matters therein appearing are true and correct.


David Springe

SUBSCRIBED AND SWORN to before me this 27th day of March, 2006.


Notary of Public

My Commission expires: 8-03-2009



CERTIFICATE OF SERVICE

06-MDWG-1027-RTS

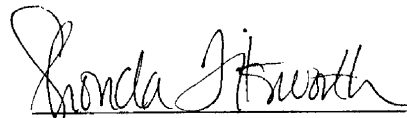
I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 27th day of March, 2006, to the following:

Susan Cunningham
General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
Hand Delivered

Laurie Pickle
Assistant General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
Hand Delivered

Patrick Parke
Vice President Customer Service
Midwest Energy, Inc.
1330 Canterbury Road, Box 898
Hays, KS 67601-0898

Frank A. Caro, Jr.
Polsinelli Shalton Welte Suelthaus PC
6201 College Blvd., Suite 500
Overland Park, KS 66211



Shonda Titsworth