

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

MAY 30 2013

In the Matter of the Application of Mid-Kansas )  
Electric Company, LLC for Approval to Make )  
Certain Changes to its Charges for Electric )  
Services in the Geographic Service Territory )  
Served by Southern Pioneer Electric Company )

by  
State Corporation Commission  
of Kansas

Docket No. 13-MKEE-699-RTS

PETITION OF KANSAS ELECTRIC POWER COOPERATIVE, INC. TO INTERVENE

Comes now Kansas Electric Power Cooperative, Inc. (KEPCo) and moves the Corporation Commission of the State of Kansas (Commission) for an order pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 permitting it to intervene in the above captioned proceeding. In support of its petition, KEPCo alleges and states as follows:

1. KEPCo is a corporation duly organized under the laws of the State of Kansas, with its principal place of business at 600 SW Corporate View, Topeka, Kansas 66615. It is authorized to do business and is conducting business in the State of Kansas.

2. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 19 member distribution cooperatives in the State of Kansas, serving more than 110,000 customers.

3. KEPCo takes transmission service from Mid-Kansas Electric Company, LLC (Mid-Kansas) for service to a number of its Members, and KEPCo members serve a significant amount of load where Mid-Kansas provides transmission service.

4. On May 17, 2013, Mid-Kansas submitted its Application for Commission approval of certain changes to its charges for electric service in the geographic service territory served by Southern Pioneer Electric Company. Included in its Application is a proposal to increase the third-party Local Access Charge, which is the charge that KEPCo pays for delivery of power through the Company's 34-kV facilities.

5. KEPCo and, ultimately, its members will or may be bound by any Commission order or activity in this proceeding, and KEPCo and its members may be adversely affected thereby.

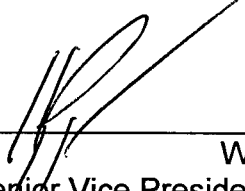
6. KEPCo's interest herein is not adequately represented by any other party.

7. All communications and correspondence to KEPCo, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

William Riggins (# 12080)  
Senior Vice President and General Counsel  
Kansas Electric Power Cooperative, Inc.  
600 SW Corporate View  
Topeka, KS 66615  
785-271-4833  
785-271-4888 (fax)  
[briggins@kepco.org](mailto:briggins@kepco.org)

Mark Doljac  
Director of Rates and Regulation  
Kansas Electric Power Cooperative, Inc.  
600 SW Corporate View  
Topeka, KS 66615  
785-271-4842  
785-271-4888 (fax)  
[mdoljac@kepco.org](mailto:mdoljac@kepco.org)

WHEREFORE, KEPCo prays that the Commission enter an Order allowing it to intervene herein and for all other relief which the Commission deems just and proper.

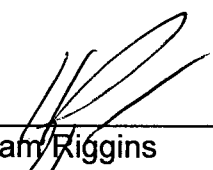
  
\_\_\_\_\_  
William Riggins (# 12080)  
Senior Vice President and General Counsel  
Kansas Electric Power Cooperative, Inc.  
600 SW Corporate View  
Topeka, KS 66615  
785-271-4833  
785-271-4888 fax  
[briggins@kepc.org](mailto:briggins@kepc.org)

**VERIFICATION**

STATE OF KANSAS            )  
  )  
COUNTY OF SHAWNEE    )        ss:

William Riggins, 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 Petition to Intervene, and upon information and belief, states that the matters therein appearing are true and correct.

  
\_\_\_\_\_  
William Riggins

SUBSCRIBED AND SWORN to before me this 30<sup>th</sup> day of May, 2013.

  
\_\_\_\_\_  
Notary Public

My Commission expires 11/5/2013



**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing was placed in the United States mail, postage prepaid, this 30<sup>th</sup> day of May, 2013, addressed to the following:

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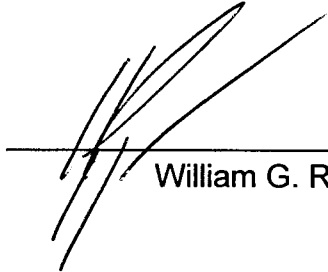
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RANDY MAGNISON, EXEC VP & ASST CEO  
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ULYSSES, KS 67880-0368

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William G. Riggins