BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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)	Docket No. 14-SPEE-507-RTS
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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 May 1, 2014, Southern Pioneer Electric Company ("Southern Pioneer") filed its Application for Approval to make certain changes to its charges for electric services pursuant to the Debt Service Coverage Formula Based Rate Ratemaking plan approved in Docket No. 13-MKEE-452-MIS.
- 3. WKIEC requests permission to intervene in this docket to represent the interests of large industrial customers, specifically National Helium and Air Products, which are ratepayers in the geographic territory served by Southern Pioneer. Likewise, changes to the DSC-FBR Plan could establish a precedent for other co-ops and could change the rates that Air Products and National Helium pay for service.

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, particularly National Helium and Air Products, 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:

Jeffry J. 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,

Curtis M. Irby, S.C. 07274

Counsel for WKIEC

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VERIFICATION

STATE OF KANSAS)
) S.S
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 has 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 6th day of May, 2014.

GLORIA M. BRAND

Notary Public, Sedgwick County, KS

My Commission Expires: December 17, 2016

GLORIA M. BRAND

Notary Public - State of Kansas

My Appt. Expires

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original Petition to Intervene was electronically filed with the Kansas Corporation Commission via their e-filing system and emailed to all parties of record for service upon them on this 6th day of May, 2014 as 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

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