

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Mid-Kansas)
Electric Company, L.L.C. for an Order Approving) Docket No.: 18-MKEE-014-MIS
the Conversion of Mid-Kansas Electric Company,)
L.L.C. to Mid-Kansas Electric Company, Inc.)

PETITION TO INTERVENE

COMES NOW, Curtis M. Irby of the Law Offices of Curtis M. Irby, Wichita, Kansas and hereby files a Petition to Intervene in the above-captioned matter on behalf of the Western Kansas Industrial electric Consumers Group (WKIEC), a voluntary association of companies who receive service from Mid-Kansas Electric Company and are provided service by Mid-Kansas Electric Company members.

Western Kansas Industrial Electric Consumers Group (WKIEC) consists of the following members to-wit and who receive service from the retail electric providers identified as follows:

1. Air Products and Chemicals, Inc.;
Retail provider: Southern Pioneer Electric Company
2. National Beef Packing Company, L.L.C., Liberal, Kansas location;
Retail provider: Southern Pioneer
3. National Beef Packing Company, L.L.C., Dodge City, Kansas location;
Retail provider: Victory Electric Cooperative, Inc.
4. Cargill, Inc.;
Retail provider: Victory Electric Cooperative, Inc.
5. Linde Gas NA, L.L.C.;
Retail provider: Western Electric Cooperative

WKIEC believes that FEMA coverage for the Mid-Kansas Electric system is important for the preservation and protection of that system from storms, natural disasters, and other occurrences, and that anything that can be done to expedite the repair

of the system after a catastrophic loss such as a storm, tornado or other natural occurrence is absolutely essential.

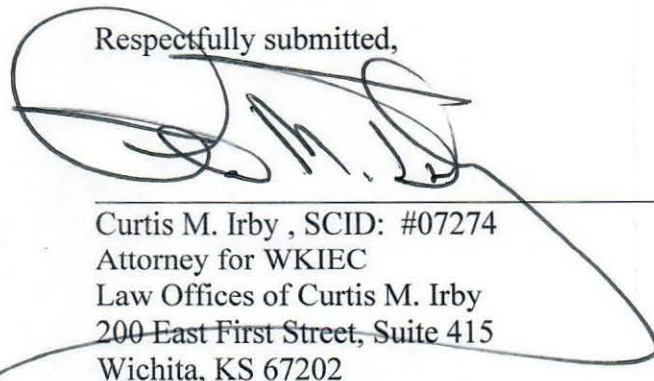
WKIEC supports the Application of Mid-Kansas for expeditious treatment and recommends to the Commission that the Application be approved.

WKIEC Counsel states that no other party to this proceeding will protect the interest of industrial electric consumers who make up WKIEC and that their intervention in this proceeding is entirely appropriate, proper, and necessary for a fair and impartial decision.

WKIEC's interests are not protected by any other party.

WHEREFORE, the Western Kansas Industrial Electric Consumers Group hereby request that the Commission grant its Petition to Intervene in the above-captioned matter and allow it to fully participate in the issues and the proceedings therein.

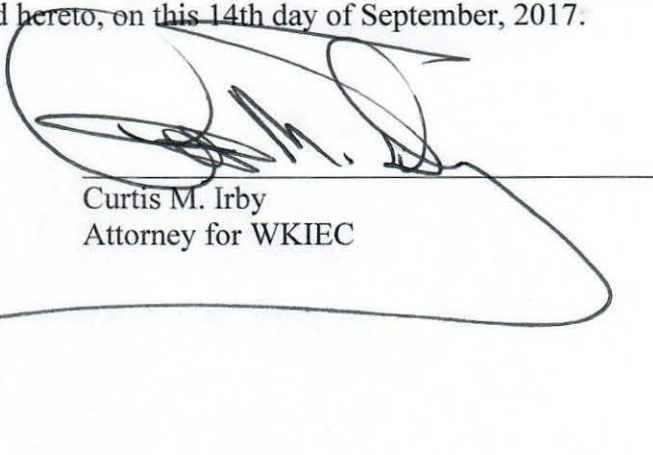
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Petition to Intervene was forwarded via e-mail to the all parties on the Commission's electronic service list, a copy of which is attached hereto, on this 14th day of September, 2017.

A handwritten signature in black ink, appearing to read "Curtis M. Irby", is written over a horizontal line. A large, loopy flourish extends from the bottom of the signature line, sweeping across the page.

Curtis M. Irby
Attorney for WKIEC



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Last modified Aug 21, 2017

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