

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Received  
on

JAN 05 2012

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

by  
State Corporation Commission  
of Kansas

Docket No. 12-MKEE-380-RTS

**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 December 20, 2011, Mid-Kansas Electric Company, LLC filed an application with the Kansas Corporation Commission for Approval to Make Certain Changes in its Charges for Electric Service in the Geographic Service Territory Served by Southern Pioneer Electric Company.
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. In addition to undersigned counsel, please include the following CURB representatives with all electronic notices, pleadings, and correspondence regarding this Application as follows:

Shonda Smith  
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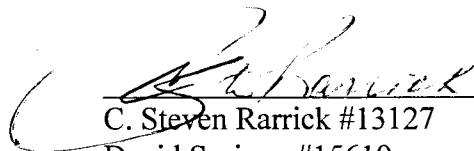
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Citizens' Utility Ratepayer Board  
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Topeka, KS 66604  
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6. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

7. 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,



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C. Steven Rarrick #13127

David Springe #15619

Niki Christopher #19311

Citizens' Utility Ratepayer Board

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**CERTIFICATE OF SERVICE**

12-MKEE-380-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 5<sup>th</sup> day of January, 2012, to the following:

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**CERTIFICATE OF SERVICE**

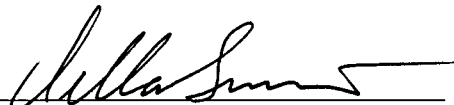
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