

McPHERSON & McVEY LAW OFFICES, Chtd.
2109 12th Street
P.O. Drawer 1429
Great Bend, Kansas 67530
(620) 793-3420

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: John Wine, Chair
Cynthia L. Claus
Brian J. Moline

DEC 13 2001

Jeffery S. Wassman Docket Room

IN THE MATTER OF THE INVESTIGATION BY)
THE COMMISSION OF THE ADEQUACY OF)
QUALITY OF RETAIL SERVICE PROVIDED BY)
KANSAS ELECTRIC PUBLIC UTILITIES AND) Docket No. 02-GIME-365-GIE
THE PRUDENCE OF DEVELOPING ELECTRIC)
SERVICE QUALITY STANDARDS)
_____)

PETITION TO INTERVENE

COMES NOW, Midwest Energy, Inc., by and through its general counsel, Brock R. McPherson of McPherson & McVey Law Offices, Chtd., and petitions the Commission for an order allowing Midwest Energy, Inc. to intervene herein pursuant to K.S.A. 77-521 and K.A.R. 82-1-225.

In support of its petition, Midwest Energy, Inc. states the following:

1. That Midwest Energy, Inc. is a corporation duly organized and existing under the laws of the State of Kansas and authorized to transact business, with a principal place of business at 1330 Canterbury Road, Hays, Kansas.

2. That Midwest Energy, Inc. is the holder of several Certificates of Convenience and Necessity from the Kansas Corporation Commission to transact the business of an electric and natural gas public utility.

3. That in the course of transacting business as a

public utility, Midwest Energy, Inc. will be effected by any order issued by the Commission in this docket.

4. That the resolution of the issues herein may ultimately affect the industry in its whole and ultimately affect the customers/owners of Midwest Energy, Inc.

5. Midwest Energy, Inc. is situated such that the representation of its owners/members' interests by existing parties is and will be inadequate.

6. The interests of justice and the orderly and prompt conduct of these proceedings will not be impaired by allowing Midwest Energy, Inc. to intervene.

7. Midwest Energy, Inc. requests the right to fully participate in this docket.

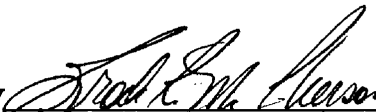
8. That copies of all pleadings filed herein be forwarded to:

Brock R. McPherson
McPherson & McVey Law Offices, Chtd.
2109 12th Street
P.O. Drawer 1429
Great Bend, KS 67530

Pat Parke
Midwest Energy, Inc.
1330 Canterbury Road
P.O. Box 898
Hays, KS 67601

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

MCPHERSON & McVEY LAW OFFICES, Chtd.


By 
BROCK R. MCPHERSON #05065
General Counsel for Midwest Energy, Inc.

VERIFICATION


STATE OF KANSAS)
)
COUNTY OF BARTON) ss:

Brock R. McPherson, of lawful age, being first duly sworn upon oath, deposes and states:

That he is the general counsel for Midwest Energy, Inc. in the above entitled cause; that he has read the above and foregoing Petition to Intervene and knows the contents thereof, and that all of the allegations, statements and averments therein contained are true and correct.


BROCK R. MCPHERSON #05065

SUBSCRIBED AND SWORN TO before me this 11th day of December, 2001.


Notary Public

My Appointment Expires:
LORETTA SPOHN
Notary Public - State of Kansas
Appointment Expires 2-2-2004

CERTIFICATE OF SERVICE

I do hereby certify that on this 11th day of December, 2001, a true and correct copy of the above and foregoing was mailed, postage prepaid and properly addressed, to:

Susan B. Cunningham, General Counsel
Kansas Corporation Commission
1500 Arrowhead Road
Topeka, KS 66604-4027

W. Thomas Stratton
Dana A. Bradbury
Kansas Corporation Commission
1500 Arrowhead Road
Topeka, KS 66604-4027

Walker Hendrix
Niki Christopher
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604

Glenda Cafer
Cafer Law Office, L.L.C.
2401 SW Crest Drive
Topeka, KS 66614

Mark English
1201 Walnut
Kansas City, MO 64106

James G. Flaherty
Anderson, Byrd, Richeson,
Flaherty & Henrichs
216 S. Hickory
P.O. Box 17
Ottawa, KS 66067

Martin J. Bregman
818 Kansas Avenue
P.O. Box 889
Topeka, KS 66601

and the original and seven copies to:

Mr. Jeff Wagaman, Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

McPHERSON & McVEY LAW OFFICES, Chtd.

By



BROCK R. McPHERSON #05065

General Counsel for Midwest Energy, Inc.