

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of Mid-)
Kansas Electric Company, LLC, Lane-Scott) Docket No. 13-MKEE-447-MIS
Electric Cooperative, Inc., Prairie Land Electric)
Cooperative, Inc., Southern Pioneer Electric)
Company, Victory Electric Cooperative)
Association, Inc., Western Cooperative Electric)
Association, Inc., and Wheatland Electric)
Cooperative, Inc., Joint Applicants, for an Order)
Approving the Transfer of Certificates of)
Convenience With Respect to All of Mid-)
Kansas' Retail Electric Services and for Other)
Related Relief.)

Received
on

JAN 16 2013

by
State Corporation Commission
of Kansas

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 January 07, 2013, Mid-Kansas Electric Company, LLC, Lane-Scott Electric Cooperative, Inc., Prairie Land Electric Cooperative, Inc., Southern Pioneer Electric Company, Victory Electric Cooperative Association, Inc., Western Cooperative Electric Association, Inc., and

Wheatland Electric Cooperative, Inc. filed an application with the Kansas Corporation Commission for an order approving the transfer of Certificates of Convenience with respect to all of Mid-Kansas' Retail Electric Services and for other related relief.

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 and the rights of 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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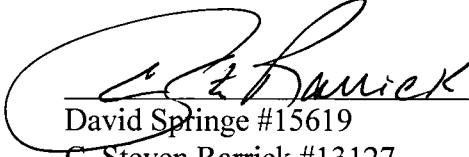
Della Smith
Administrative Specialist
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6. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

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,



David Springe #15619

C. Steven Rarrick #13127

Niki Christopher #19311

Citizens' Utility Ratepayer Board

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VERIFICATION

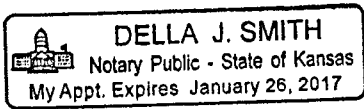
STATE OF KANSAS)
)
COUNTY OF SHAWNEE) SS:

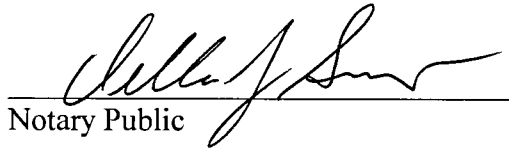
I, C. Steven Rarrick, of lawful age, being first duly sworn upon his oath states:

That he is an attorney for the above named petitioner; that he has read the above and foregoing Intervention, and, upon information and belief, states that the matters therein appearing are true and correct.


C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 16th day of January, 2013.




Notary Public

My Commission expires: 01-26-2017.

CERTIFICATE OF SERVICE

13-MKEE-447-MIS

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 16th day of January, 2013, to the following:

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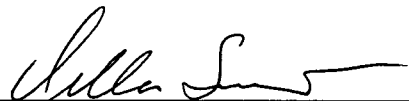
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