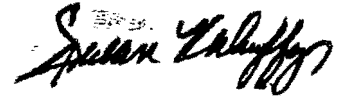


**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

STATE CORPORATION COMMISSION

JAN 03 2011



In the Matter of the Application of Mid-)
Kansas Electric Company, LLC for) Docket No. 11-MKEE-439-RTS
Approval to Make Certain Changes in its)
Charges for Electric Service)

PETITION TO INTERVENE

Comes now Kansas Electric Power Cooperative, Inc. (KEPCo) and moves the Corporation Commission of the State of Kansas (Commission) for an order pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 permitting it to intervene in the above captioned proceeding. In support of its petition, KEPCo alleges and states as follows:

1. KEPCo is a corporation duly organized under the laws of the State of Kansas, with its principal place of business at 600 SW Corporate View, Topeka, Kansas 66615. It is authorized to do business and is conducting business in the State of Kansas.

2. KEPCo is engaged in the business of a generation and transmission cooperative electric supplier providing power and energy to 19 member distribution cooperatives in the State of Kansas, serving approximately 300,000 consumer members.

3. On December 14, 2010, Mid Kansas Electric Company, LLC (MKEC) filed its application for approval to make changes in its charges for electric service. The application requests changes in both rates for electric power and energy and the

establishment of a local access charge for services by Mid-Kansas to customers accessing the 34.5 kV sub-transmission owned by Wheatland Electric Cooperative, Inc. (Wheatland).

4. KEPCo delivers electric service to three of its members through delivery points on the 34.5 kV system owned and operated by Wheatland.

5. KEPCo will be directly affected by the change in rate for local delivery service proposed by the Applicant, and KEPCo and, ultimately, its members will or may be bound by any Commission order or activity in this proceeding, and KEPCo and its members may be adversely affected thereby.

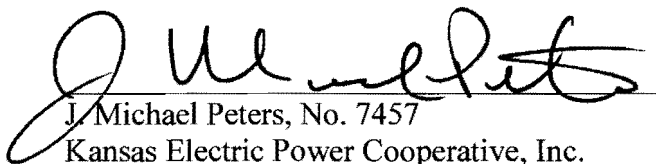
6. KEPCo's interest herein is not adequately represented by the existing parties.

7. All communications and correspondence to KEPCo, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

J. Michael Peters, No. 7457
Vice President, Administration and
General Counsel
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
785-271-4836
785-271-4888 fax
mpeters@kepco.org

Mark Doljac
Director of Rates and Regulation
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
785-271-4842
785-271-4888 (fax)
mdoljac@kepco.org (email)

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


J. Michael Peters, No. 7457

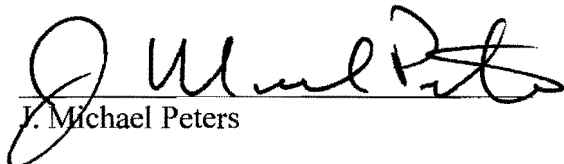
Kansas Electric Power Cooperative, Inc.
600 SW Corporate View
Topeka, KS 66615
785-271-4836
785-271-4888 fax
mpeters@kepco.org

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

I, J. Michael Peters, 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 Petition to Intervene, and upon information and belief, states that the matters therein appearing are true and correct.


J. Michael Peters

SUBSCRIBED AND SWORN to before me this ___ day of January, 2011.


Notary Public

My Commission expires 11/5/2013



CERTIFICATE OF SERVICE

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 3rd day of January, 2011, to the following:

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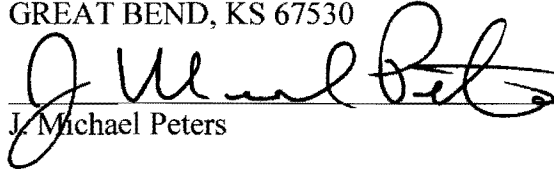
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