

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Mid-Kansas)
Electric Company, LLC for Approval to Make) Docket No. 12-MKEE-410-RTS
Certain Changes in its Charges for Electric)
Services in the Geographic Service Territory)
Served by Lane Scott Electric Cooperative, Inc.)

Received
on

JAN 15 2013

CURB'S LIST OF CONTESTED ISSUES

by
State Corporation Commission
of Kansas

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and submits CURB's List of Contested Issues pursuant to the Commission's September 19, 2012, Order Setting Procedural Schedule.


1. The following issues remained contested by CURB:
 - Whether the settlement agreement reached between MKEC and Staff results in just and reasonable rates.
 - Cost of capital and capital structure
 - Overall revenue deficiency
 - The appropriate ratemaking methodology to utilize in this case
 - Rate base, including:
 - Acquisition Adjustment
 - Working Capital
 - Cash Working Capital
 - Operating income at present rates, including:
 - Depreciation/Amortization Associated with Acquisition Adjustment
 - Dues, Donations, Lobbying
 - Advertising
 - Entertainment
 - Directors Fees and Expenses
 - Miscellaneous Expenses (Satellite Radio, Marketing Tools)
 - Whether the MKEC Lane Scott Division is in compliance with all the provisions of the Order and S&A approved in KCC Docket No. 06-MKEE-524-ACQ.
 - Whether the MKEC Lane Scott Division has been operated or managed independently from the Lane Scott native system as required by the Order and S&A in KCC Docket No. 06-MKEE-524-ACQ.

- Whether the MKEC Lane Scott Division and Lane Scott native system should formalize any future intercompany loans to allow proper evaluation of the financial condition of the regulated entity.

2. The list of contested issues submitted by CURB is not an agreement by other parties that any specified issue is a valid, relevant, or contested issue. Since the procedural schedule does not allow time for parties to file responses to other parties' contested issues list, and the settlement agreement reached between the Company and Staff was not filed until the afternoon of January 14, 2013, CURB's list of contested issues should not be construed as impairing CURB's ability to present arguments concerning any of the issues listed by CURB or other parties, or to restrict the scope of its response to arguments made by other parties. Further, CURB reserves the right to supplement this list of contested issues if it is determined that a contested issue has been omitted.

3. CURB submits its List of Contested Issues for consideration by the Commission.

Respectfully submitted,



C. Steven Rarrick #13127

David Springe #15619

Niki Christopher #19311

Citizens' Utility Ratepayer Board

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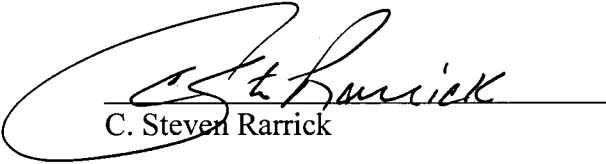
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VERIFICATION

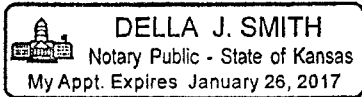
STATE OF KANSAS)
)
) ss:
COUNTY OF SHAWNEE)

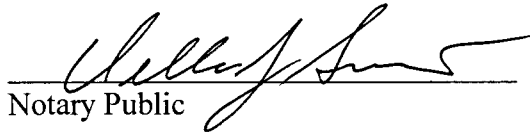
I, C. Steven Rarrick, of lawful age, being first duly sworn upon his oath states:

That he is an attorney for the above named petitioner; that he has read the above and foregoing document, 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 15th day of January, 2013.


DELLA J. SMITH
Notary Public - State of Kansas
My Appt. Expires January 26, 2017


Notary Public

My Commission expires: 01-26-2017.

CERTIFICATE OF SERVICE

12-MKEE-410-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service this 15th day of January, 2013, to the following parties who have waived receipt of follow-up hard copies:

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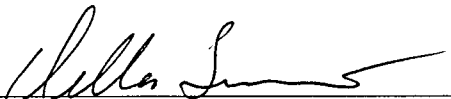
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