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January 22, 2001

Dorothy Wideman
Executive Secretary
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909-7721

HAND DELIVERED

Re: Wabash Valley Power Association Inc.
Case No. U-12657

Dear Ms. Wideman,

Enclosed is an original and four (4) copies of the Petition to Intervene of Wabash Valley Power Association, Inc. in the above-entitled matter. This Petition is also being filed electronically. If you have any questions, please call.

Very truly yours,

LOOMIS, EWERT, PARSLEY,
DAVIS & GOTTING, P.C.


Ronald W. Bloomberg

RWB:blp
enclosure

cc w/encl: Al Ernst

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of Midwest Energy Cooperative's)
compliance filing relative to the restructuring plan)
required by 2000 PA 141 and the Commission's)
June 19, 2000, opinion and order in Case No. U-12464)
_____)

Case No. U-12657

**PETITION TO INTERVENE OF
WABASH VALLEY POWER ASSOCIATION INC.**

Wabash Valley Power Association Inc. ("Wabash") claims an interest in this proceeding and, therefore, pursuant to Rule 201 of the Rules of Practice and Procedure before the Michigan Public Service Commission ("Commission"), 1992 AACSR 460.17201, petitions for leave to intervene and in support of its Petition, Wabash represents as follows:

1. Wabash is a generation and transmission cooperative incorporated under the Indiana Not-For-Profit Corporation Act for the purpose of providing electric energy to its 24-member system. Twenty-two of the member-cooperatives are located in Indiana, one is located in Ohio, and Midwest Energy Cooperative ("Midwest") is located in Michigan.
2. Midwest is, among other things, an all-requirements wholesale customer of Wabash with respect to territory formerly served by Fruit Belt Electric Cooperative ("Fruit Belt") prior to its merger with Southeastern Rural Electric Cooperative, which merger resulted in Midwest being the surviving corporation.
3. The Commission exercises jurisdiction over Wabash's **sales** of electricity to Midwest pursuant to the Commission's June 26, 1986, Order in MPSC Case No. U-7963.
4. Wabash owns meters, and various load control equipment related thereto, through which electricity is currently transmitted into the Fruit Belt portion of Midwest's service territory. Wabash

has various transmission rights over the transmission lines leading to such meters, but does not own the lines themselves.

5. Unless duplicative facilities are installed, the supplying of electricity to the former Fruit Belt service territory for retail direct access service will involve use of meters and possibly transmission rights of Wabash and will require coordination between Midwest and Wabash as to, among other things, the metering and billing for the electricity delivered to both the direct access customer and Midwest through the Wabash facilities.

6. Since, absent the construction of duplicative facilities, Wabash and its facilities will be involved in the delivery of electricity by Midwest to the direct access retail customer, Wabash has a direct interest in the outcome of this proceeding and may suffer injury if the outcome of this case does not provide for, or at least be not inconsistent with, reasonable coordination between Midwest and Wabash with regards to providing the customer with access to electricity for retail direct access service. Wabash's interests in this regard are within the zone of interests the statute and hearing requirement were designed to protect. Thus, Wabash has standing to intervene.

7. Wabash's intervention in this case satisfies the Commission's criteria for granting permissive discretionary intervention. See Re Ameritech Communications, Inc., April 10, 1996, Order in MPSC Case No. U-11053. Wabash has a direct interest in the outcome of this case. It has a unique position different from the general public. Wabash is in a good position to provide information addressing the material issues in this case. Granting intervention will not delay a timely resolution of this case.

8. Wabash seeks to intervene in this case as a party with full rights.

9. Wabash's general position in this case will be to promote the adoption of an order containing terms and conditions which, while not inconsistent with Wabash's rights and interest, reasonably

promote the ability of Midwest to provide retail direct access service. Wabash reserves the right to raise additional issues and take different positions based upon future developments in the case.

WHEREFORE, the Wabash Valley Power Association Inc., respectfully requests that this Honorable Commission grant the requested intervention, and that it be treated as a full party to these proceedings for all purposes.

Respectfully submitted,

WABASH VALLEY POWER ASSOCIATION INC.

Dated: January 22, 2001

By : 
One of Its Attorneys
Ronald W. Bloomberg (P30011)
Loomis, Ewert, Parsley, Davis & Gotting, P.C.
232 S. Capitol Avenue, Suite 1000
Lansing, Michigan 48933
(517) 482-2400

STATE OF MICHIGAN

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_____)

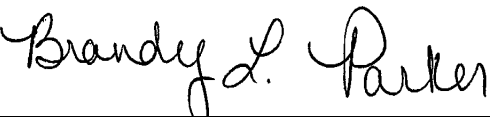
Case No. U-12657

PROOF OF SERVICE

Brandy L. Parker, employed at Loomis, Ewert, Parsley, Davis & Gotting, P.C., being duly sworn, affirms that on this 22nd day of January 2001, she served a copy of the Petition to Intervene of Wabash Valley Power Association, Inc. in the above referenced matter upon the following person:

Al Ernst
Dykema Gossett, PLLC
800 Michigan National Tower
Lansing, MI 48933-1707

via first class mail.



Brandy L. Parker

Subscribed and sworn to before me on this 22nd day of January, 2001.



Edith D. Loomis, Notary Public
Ingham County, Michigan
My Commission expires: 12/05/2002