BEFORE THE STATE CORPORATION COMMISSION TATE CORPORATION COMMISSION OF THE STATE OF KANSAS

NOV 2 6 2001

In the Matter of the Investigation by the)	Ω_{II}	1	Waganon	Docket
Commission of the Adequacy of Quality of)	E Labert	17	Cagamir.	ноот
Retail Service Provided by Kansas Electric)	Docket No. 02-GIME-365-GIE			
Public Utilities and the Prudence of)				
Developing Electric Service Quality)				
Standards.)				

PETITION FOR INTERVENTION

COMES NOW Kansas City Power and Light Company ("KCPL"), and pursuant to K.A.R. 82-1-225, and any and all other applicable statutes, regulations, and laws of the State of Kansas, petitions the State Corporation Commission of the State of Kansas ("Commission") for intervention in the above-entitled docket, and states and alleges as follows:

- 1. KCPL is an electric public utility operating in the state of Kansas pursuant to a certificate of convenience and necessity issued by the Commission. KCPL's principal place of business is located at 1201 Walnut, Kansas City, Missouri 64106.
- 2. Since this docket will investigate quality of service standards for the provisioning of electric service by all electric public utilities in the state of Kansas, KCPL will be affected by any order of the Commission issued in this docket.
- 3. The interests of justice and the orderly and prompt conduct of the proceedings in this docket will not be impaired by allowing the intervention of KCPL.
- 4. KCPL requests the right to fully participate in this docket, including, but not limited to the right to conduct discovery, present witnesses, cross-examine witnesses,

present motions and responses and participate in all hearings in the docket, and all other rights that may be granted to interveners under applicable Kansas law.

WHEREFORE, KCPL respectfully requests the Commission grant its Petition for Intervention in this Docket.

Respectfully submitted,

Glenda Cafer

(#13342)

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Email: Mark English@kcpl.com

ATTORNEYS FOR KANSAS CITY POWER AND LIGHT

VERIFICATION

STATE OF KANSAS

COUNTY OF SHAWNEE)
Kansas City Power and Light Co	oath first duly sworn, states that she is the attorney for ompany, and that she has read the foregoing Motion, that thereof, and that the statements contained therein are truowledge and belief.
	Glenda Cafer
Subscribed and sworn to 2001.	before me this Hay of Newmber,
LINOUS	Motor Dublic Linguist

appointment expires: \(\sum_0\), 20,

CERTIFICATE OF SERVICE

I hereby certify that a correct copy of this Motion to Intervene was sent via U.S. Mail or hand-delivered on the day of Nov., 2001 to:

Tom Stratton Kansas Corporation Commission 1500 SW Arrowhead Rd. Topeka, Ks. 66604

Walker Hendrix Citizen's Utility Ratepayers Board 1500 SW Arrowhead Road Topeka, Ks. 66604

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