

The application was filed in accordance with the Order issued by the Commission in KCC Docket No. 106,850-U on June 21, 2001..

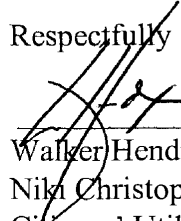
4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. The service received by those customers will or may be affected by any Commission order or activity in this proceeding.

5. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

6. 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,



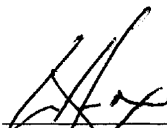
Walker Hendrix #08835
Niki Christopher #19311
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, Walker Hendrix, 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.



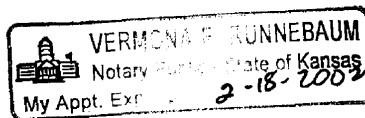
Walker Hendrix

SUBSCRIBED AND SWORN to before me this 13th day of December, 2001.



Notary of Public

My Commission expires: 2-18-2002.



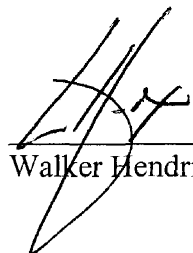
CERTIFICATE OF SERVICE

I, Walker Hendrix , hereby certify a true and correct copy of the foregoing, was hand delivered on this 13th day of December, 2001 to:

Susan Cunningham
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604
Hand Delivered

Larry G. Willer
Director Rates and Regulations
KGS
7421 W. 129th St.
Overland Park, KS 66213

John P. DeCoursey
Larry M. Cowger
7421 W. 129th St.
Overland Park, KS 66213



Walker Hendrix