

STATE CORPORATION COMMISSION

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

MAR 14 2002

Before Commissioners: John Wine, Chair
Cynthia L. Claus, Commissioner
Brian J. Moline, Commissioner

Jeffery S. Wasaman Docket Room

In the Matter of the Investigation into the)
Affiliate Transactions between UtiliCorp) Docket No. 02-UTCG-701-GIG
United, Inc. (UCU) and its Unregulated)
Businesses.)

PETITION TO INTERVENE

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and moves the Corporation Commission of the State of the Kansas ("Commission") for an order permitting it to intervene in the above-captioned proceeding. In support of its petition, CURB states and alleges as follows:

1. CURB is composed of five volunteer consumer advocate members and is statutorily authorized to represent the interests of Kansas residential and small commercial ratepayers in utility proceedings.
2. CURB's Consumer Counsel has been given the discretion to intervene and represent the interests of Kansas residential and small commercial ratepayers in any utility proceeding before the Commission under K.S.A. 66-1223 et seq.
3. On March 11, 2002, the Commission issued an order initiating an investigation into the standards and criteria for affiliate transactions involving the regulated utility businesses and unregulated businesses of UtiliCorp United, Inc. (UCU).
4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. This investigation will assess the impact of and risks associated with UCU's interest in or affiliations with unregulated

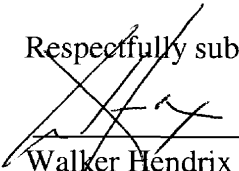
businesses on UCU's jurisdictional electric and natural gas public utility businesses and determine whether any guidelines or criteria should be established regarding the relationship between the regulated business and the unregulated activities.

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,



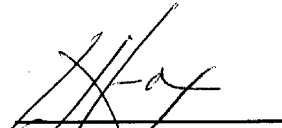
Walker Hendrix #08835
Niki Christopher #19311
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

VERIFICATION

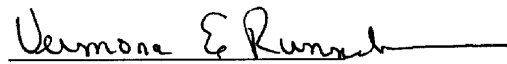
STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, Walker Hendrix, of lawful age, being first duly sworn upon his oath states:

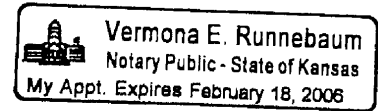
That he is an attorney for the above named petitioner; that he has read the above and foregoing Intervention, and, upon information and belief, states that the matters therein appearing are true and correct.


Walker Hendrix

SUBSCRIBED AND SWORN to before me this 13th day of March, 2002.


Notary of Public

My Commission expires: 2-18-2006.

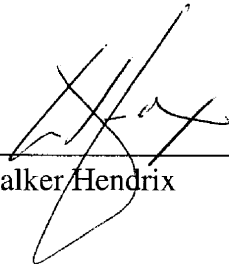


CERTIFICATE OF SERVICE

I, Walker Hendrix , hereby certify a true and correct copy of the foregoing, was hand delivered on this 14th day of March, 2002 to:

Anne Tymeson
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604
Hand Delivered

James G. Flaherty
Anderson, Byrd, Richeson, Flaherty &
Henrichs
P.O. Box 17
Ottawa, KS 66067



Walker Hendrix