2006.11.30 16:45:19 Kensas Corporation Commission 787 Susan K. Duffy

STATE CORPORATION COMMISSION

## BEFORE THE STATE CORPORATION COMMISSION NOV 3 0 2006 OF THE STATE OF KANSAS

Suman Thingfor Docket Room

In The Matter of the General Investigation)Into Billing Standards Related to Security)Deposits for Residential and Nonresidential) Docket No. 07-GIMX-446-GIVCustomers of Gas, Electric, and Water)Public Utilities.)

## **PETITION TO INTERVENE**

COMES NOW Kansas Electric Cooperatives, Inc. (KEC), and moves the Corporation Commission of the State of Kansas (KCC) for an order permitting KEC to intervene in the above – captioned proceeding. In support of this petition, KEC states as follows:

1. KEC is the statewide organization of electric cooperatives whose membership consists of twenty-eight distribution electric cooperatives and two generation and transmission cooperatives operating in the State of Kansas.

2. KEC members include both regulated cooperatives and cooperatives that have deregulated pursuant to the local option provisions of KSA 66-104d.

3. Those cooperatives that have deregulated pursuant to the provisions of KSA 66-104d retain an interest in these proceedings inasmuch as the membership of such a cooperative may in the future vote to place the cooperative under the jurisdiction of the KCC. Also, projected growth in some electric cooperative systems could result in existing deregulated cooperatives exceeding the size limitation for eligibility for deregulated status in the near future. Thus the outcome of the investigation could impact the KEC membership.

4. Participation by the electric cooperatives and coordinated by KEC in this proceeding will not hinder or delay the proceeding.

5. Notices and pleadings in the proceeding may be mailed to Stuart S. Lowry,

Executive Vice President/General Counsel, Kansas Electric Cooperatives, Inc., P.O. Box

4267, Topeka, Kansas, 66604

• • ·

WHEREFORE, KEC respectfully requests permission to intervene in this proceeding and for such other further relief is may be just and proper.

KANSAS ELECTRIC COOPERATIVES, INC conser boury

Stuart S. Lowry # 12482 Executive Vice President/General Counsel Kansas Electric Cooperatives, Inc P.O. Box 4267 Topeka, Kansas 66604 Telephone 785.478.4554 Facsimile 785.478.4852 slowry@kec.org

## VERIFICATION

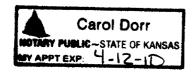
STATE OF KANSAS ) ) SS: COUNTY OF SHAWNEE )

Stuart S. Lowry, of lawful age, being first duly sworn, deposes and states: that he is the attorney for Kansas Electric Cooperatives, Inc.; that he has read the above and foregoing petition; and that the statements contain therein are true and correct to the best of his knowledge and belief.

contra contry

Stuart S. Lowry #12482

Subscribed and sworn to before me this  $30^{\text{th}}$  day of November, 2006.



"and Don

Notary Public

## **CERTIFICATE OF MAILING**

. . .

I hereby certify that on the <u>30th</u> day of November, 2006, a copy of the above and forgoing Petition to Intervene was mailed by first class mail postage prepaid to those listed on the service list maintained for this docket.

somper sons

Stuart S. Lowry, #12482