

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: Brian J. Moline, Chair
Robert E. Krehbiel
Michael C. Moffet

JUN 23 2006

 Docket Room

In the Matter of The Empire District Electric)
Company Filing Monthly Fuel Purchase) Docket No. 06-EPDE-1016-EPR
Reports in Compliance with the Policy)
Established by Commission Order Dated)
September 25, 2002, in Docket No. 106,850-)
U/75-GIMC-009-GIG.)

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 16th, 2006, The Empire District Electric Company ("Empire"), filed its monthly fuel Purchase Reports in Compliance with the Policy Established by the Commission Order dated September 25, 2002 in Docket No. 106,850-U/75-GIMC-0009-GIG.
4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. The rates paid and 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,



~~David Springe #15619~~

Niki Christopher #19311

Citizens' Utility Ratepayer Board

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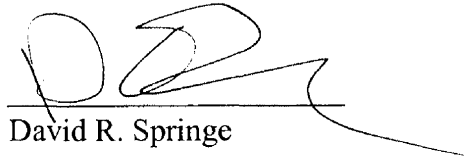
(785) 271-3116 Fax

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing docket was placed in the United States mail, postage prepaid, or hand delivered this 23rd day of June, 2006, to the following:

Otto Newton
Assistant General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604

James G. Flaherty
Anderson & Byrd
PO Box 17
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David R. Springe