

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

JAN 16 2009

**IN THE MATTER OF A GENERAL
INVESTIGATION INTO THE
COMMISSION'S CONSIDERATION
OF THE PUBLIC UTILITY
REGULATORY POLICY ACT'S
ELECTRIC STANDARDS AS
IMPLEMENTED IN THE ENERGY
INDEPENDENCE AND SECURITY
ACT OF 2007**

 Docket
Room
Docket 09-GIME-360-GIE

**PETITION TO INTERVENE ON BEHALF OF
ELSTER INTEGRATED SOLUTIONS**

COMES NOW Elster Integrated Solutions ("Elster") by and through its counsel, Charles J. Woodin of Foulston Siefkin LLP. In support of this docket, Elster avers the following:

1. Elster, with its headquarters in Raleigh, North Carolina and operations in 22 countries, serving customers in over 70 countries, is a leading provider of Advanced Metering Infrastructure (AMI) solutions that help utility companies improve revenue cycle services, customer service, delivery reliability, and workforce utilization. With more than 100 years of electricity metering experience (formerly as Westinghouse Electric Corporation and ABB Electricity Metering), Elster understands the unique requirements of utility customers worldwide.

2. Elster is interested in becoming a party in the above-captioned docket. It provides open standards-based network solutions to utilities for advanced metering infrastructure (AMI), demand response, and grid management. Its solutions enable utilities to better serve their customers, develop new revenue sources, and reduce overall expenses.

3. Elster has been involved extensively in related proceedings, like the EPACT 2005 proceedings across the country and before other state public utility commissions. Our interest in participating in this proceeding is to inform and educate the Commission on the issues of Smart Grid Investments and Smart Grid information and their value to both utilities and customers.

4. Elster has a substantial and bona fide interest in the subject matter of this docket and its interests cannot be represented or protected adequately by other existing parties to this docket.

5. Elster intends to play a constructive role in the Commission's decision-making process herein and their participation will not unduly prejudice any party.

6. Elster respectfully requests that it be given full party status in this case and be placed on the Commission's Official Service List for this docket.

7. Elster's counsel and to whom all correspondence and pleadings in this docket should be directed to are:

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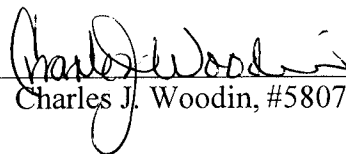
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WHEREFORE, Elster respectfully requests that the State Corporation Commission of the State of Kansas grant this intervention and allow Elster to participate in the above captioned investigation. We look forward to participating in the process going forward and contributing our experience and expertise.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of January, 2009 the foregoing Petition to Intervene on Behalf of Elster Integrated Solutions was mailed via United States Mail, postage prepaid and properly addressed to:

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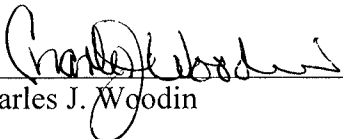
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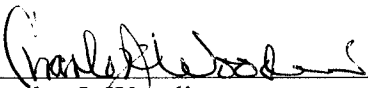
Charles J. Woodin

VERIFICATION

STATE OF KANSAS)
) ss:
SEDGWICK COUNTY)

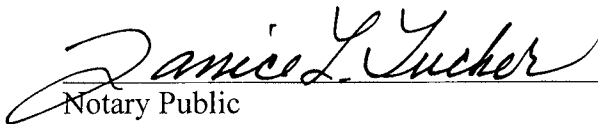
Charles J. Woodin of lawful age, being first duly sworn on oath, states:

That he is one of the attorneys for Elster Integrated Solutions; that he has read and is familiar with the foregoing Petition to Intervene; and that the statements therein are true and correct to the best of his knowledge and belief.



Charles J. Woodin

SUBSCRIBED AND SWORN TO before me this 15 day of January, 2009, by Charles J. Woodin.



Notary Public

My Appointment Expires:

