## 2013.04.16 11:46:57 Kansas Corporation Commission /S/ Patrice Petersen-Klein

# THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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APR 1 6 2013

Received

on

In the Matter of the Applications of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval to Make Certain Changes in Their Charges for Electric Service.

by
State Corporation Commission
of Kansas Docket No. 13-WSEE-629-RTS

## 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 April 15, 2013, Westar Energy, Inc. and Kansas Gas and Electric Company filed an application with the Kansas Corporation Commission seeking approval to make certain changes in their charges for electric service.

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. In addition to undersigned counsel, please include the following CURB representatives with all electronic notices, pleadings, and correspondence regarding this Application as follows:

Shonda Smith	Della Smith
Office Manager	Administrative Specialist
Citizens' Utility Ratepayer Board	Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road	1500 SW Arrowhead Road
Topeka, KS 66604	Topeka, KS 66604
Email: <u>sd.smith@curb.kansas.gov</u>	Email: d.smith@curb.kansas.gov

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

7. 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 C. Steven Rarrick #13127 Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 (785) 271-3200 (785) 271-3116 Fax

### VERIFICATION

ss:

STATE OF KANSAS

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COUNTY OF SHAWNEE

I, Niki Christopher, of lawful age, being first duly sworn upon her oath states:

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

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Niki Christopher

SUBSCRIBED AND SWORN to before me this 16<sup>th</sup> day of April, 2013.

DELLA J. SMITH Notary Public - State of Kansas My Appt. Expires January 26, 2017

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My Commission expires: 01-26-2017.

#### **<u>CERTIFICATE OF SERVICE</u>**

### 13-WSEE-629-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 16<sup>th</sup> day of April, 2013, to the following:

RAY BERGMEIER, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD ROAD TOPEKA, KS 66604-4027 \*\*Hand Delivered\*\* r.bergmeier@kcc.ks.gov

AMBER SMITH, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD ROAD TOPEKA, KS 66604-4027 \*\*Hand Delivered\*\* <u>a.smith@kcc.ks.gov</u>

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Della Smith Administrative Specialist