THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

SIAIE	CURPORATION	COMMISSIO
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APR 0 5 2007

Before Commissioners: Brian J. Moline, Chair

Robert E. Krehbiel

Michael C. Moffet

Julan.	Talyfy	Docket Room

In the Matter of the Joint Application of
Great Plains Energy Incorporated, Kansas
City Power & Light Company and Aquila,
Inc. for approval of the Acquisition of
Aquila, Inc. by Great Plains Energy
Incorporated.

)

Docket No. 07-KCPE-1064-ACQ
)

Application of
)

Aquila, Inc. by Great Plains Energy
)

Incorporated.
)

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 4, 2007, Great Plains Energy Incorporated, Kansas City Power & Light Company ("KCPL") and Aquila, Inc. ("Aquila") filed a joint application seeking approval of the acquisition of Aquila by KCPL's parent holding company, Great Plains Energy Incorporated.

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

C. Steven Rarrick #13127

Citizens' Utility Ratepayer Board

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VERIFICATION

STATE OF KANSAS)	001
COUNTY OF SHAWNEE)	SS:
I, Niki Christopher, of lawful	age, being fir	st duly sworn upon her oath states:
•		d petitioner; that she has read the above and belief, states that the matters therein appearing
	M	hd
	Niki	Christopher
SUBSCRIBED AND SWORM	N to before m	e this 5th day of April, 2007.
	Notar	andat Stauckth
My Commission syminas, 8,02,2000		
My Commission expires: 8-03-2009.	•	SHONDA D. TITSWORTH Notary Public - State of Kansas My Appt. Expires August 3, 2009

CERTIFICATE OF SERVICE

07-KCPE-1064-ACQ

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 5th day of April, 2007, to the following:

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