

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATECORPORATIONCOMMISSION

Before Commissioners: John Wine, Chair
Susan M. Seltsam, Commissioner
Cynthia L. Claus, Commissioner

NOV 06 1998

In the Matter of the Investigation by the
Commission of the adequacy of future
Kansas electric generation capacity.

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Docket No. 99-GIME-321-GIE

David J. Heinemann Docket
Room

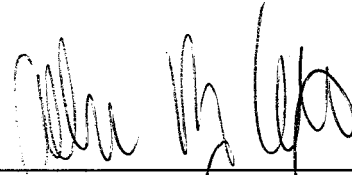
PETITION FOR LEAVE TO INTERVENE

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and moves the Kansas State Corporation Commission ("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. On November 5, 1998, the Commission issued Order Directing Investigation in the above captioned matter.
3. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers. The rates paid and service received by those customers will or may be affected by the Commission order in this proceeding.
4. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.
5. The residential ratepayers and small businesses whose interests CURB represents will or may be bound by a Commission order in this proceeding and will or may be adversely affected thereby:

CURB moves the Commission for an order allowing it to intervene in this proceeding and to become a party of record with all rights to have notice of and participate in hearings, to present evidence, to cross-examine witnesses, to file briefs and participate in argument, and for all other

necessary and proper purposes.

A handwritten signature in black ink, appearing to read "Walker Hendrix", positioned above a horizontal line.

Walker Hendrix #08835

Allen Brady Cantrell # 17721

Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

Topeka, KS 66604

VERIFICATION

STATE OF KANSAS

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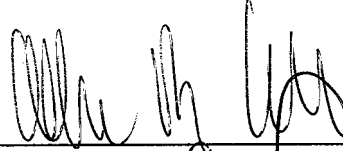
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COUNTY OF SHAWNEE

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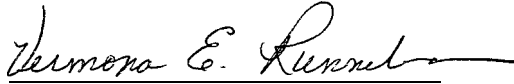
Allen Brady Cantrell, of lawful age, being first duly sworn upon his oath states:

That he is the attorney for the above named petitioner; that he has read the above and foregoing Petition for Leave to Intervene and, upon information and belief, states that the matters therein appearing are true and correct.



Allen Brady Cantrell

SUBSCRIBED AND SWORN to before me this 6th day of November, 1998.



Notary of Public

My Commission expires: 2-18-2002.

