

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: John Wine, Chair  
Cynthia L. Claus, Commissioner  
Brian J. Moline, Commissioner

APR 24 2001

*Abby L. Wegman* Docket Room

In the Matter of the Application of Kansas )  
City Power & Light Company for an Order ) Docket No. 01 -KCPE-708-MIS  
Authorizing Its Plan to Reorganize Itself )  
Into a Holding Company Structure. )

**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. 66-1 223 et seq.
3. On February 26, 2001, Kansas City Power & Light Company (KCPL) filed its plan to reorganize itself into a hold company structure.
4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. 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.

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.

Respectfully submitted,



---

Walker Hendrix #08835  
Niki Christopher # 193 1 1  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Road  
Topeka, KS 66604



CERTIFICATE OF SERVICE

I, Niki Christopher, hereby certify a true and correct copy of the foregoing, was mailed or hand delivered on this 24<sup>th</sup> day of April, 2001 to:

Susan Cunningham  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604

William G. Riggins  
General Counsel  
Kansas City Power & Light Co.  
1201 Walnut St.  
Kansas City, MO 64106

Chris B. Giles  
Senior Director, Revenue and Resource Management  
KCPL  
120 1 Walnut  
Kansas City, MO 64106



---

Niki Christopher