2004.05.20 13:50:38 Kansas Corporation Commission /S/ Susan K. Duffy

## THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners:

Brian J. Moline, Chair John Wine, Commissioner Robert E. Krehbiel, Commissioner

)

Susan Taling Docket Room

MAY 2 0 2004

In the Matter of the Future Supply, Delivery and Pricing of the Electric Service Provided by Kansas City Power & Light Company.

) Docket No. 04-KCPE-1025-GIE

## 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 May 18, 2004, Kansas City Power & Light Company ("KCP&L") filed a request with the Kansas Corporation Commission to open an investigatory docket and to establish an informal panel discussion process. The purpose of the investigatory docket and informal panels will be to discuss and gain consensus on, constructive regulatory responses to emerging issues that will affect the supply, delivery and pricing of the electric service provided by KCP&L.

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 Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 (785) 271-3200 (785) 271-3116 Fax

## VERIFICATION

STATE OF KANSAS	)	
	)	SS
COUNTY OF SHAWNEE	)	

I, David Springe, of lawful age, being first duly sworn upon his oath states:

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

A David Springe SUBSCRIBED AND SWORN to before me this  $2^{\hat{\ell}_{a}^{\dagger h}}$  of  $\underline{\mathcal{M}_{a}}_{J}$ , 2004. Vermona E. Kurmlo-Notary of Public

My Commission expires: <u>2-18-2006</u>.

	Vermona E. Runnebaum Notary Public - State of Kansas
My App	t. Expires February 18, 2008

## CERTIFICATE OF SERVICE

I, David Springe, hereby certify a true and correct copy of the foregoing, was hand delivered, or placed in the United States mail, postage prepaid, on this  $\underline{\mathcal{I}}$  day of  $\underline{\mathcal{M}}$  and  $\underline{\mathcal{M}}$  and  $\underline{\mathcal{I}}$  day of to:

Susan Cunningham Kansas Corporation Commission 1500 S.W. Arrowhead Rd. Topeka, KS 66604 \*\*Hand Delivered\*\*

William G. Riggins General Counsel Great Plains Energy 1201 Walnut Kansas City, MO 64106

Chris B. Giles Senior Director, Revenue and Resource Mgt. Kansas City Power & Light Company 1201 Walnut Kansas City, MO 64106

Frank A. Caro, Jr. Polsinelli, Shalton & Welte, P.C. 6201 College Blvd. Suite 500 Overland Park, KS 66211

David Springe