

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

SEP 01 2005

Before Commissioners:

Brian J. Moline, Chair
Robert E. Krehbiel
Michael C. Moffet

 Docket Room

In the Matter of the Investigation of) Docket No. 06-GIMX-181-GIV
Affiliate and Ring-Fencing Rules)
Applicable to all Kansas Electric and Gas)
Public Utilities.)

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 August 30, 2005, the State Corporation Commission of Kansas issued an order in the above docket for a general investigation of affiliate and ring-fencing rules applicable to all Kansas electric and gas public utilities.

4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. Any rules changes could


potentially affect the rates paid and the service received by those customers.

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,



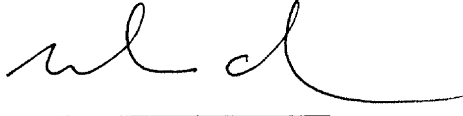
David Springe #15619
Niki Christopher #19311
Citizens' Utility Ratepayer Board
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VERIFICATION

STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

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.



Niki Christopher

SUBSCRIBED AND SWORN to before me this 1st day of September, 2005.



Notary of Public

My Commission expires: 8-03-2009

CERTIFICATE OF SERVICE

06-GIMX-181-GIV

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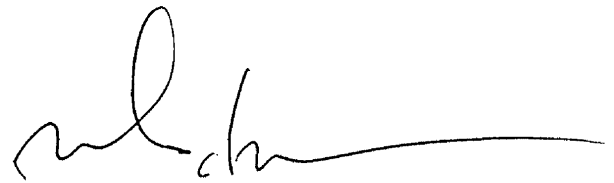
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Niki Christopher

CERTIFICATE OF SERVICE

06-GIMX-181-GIV

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 1st day of September, 2005, to the following:

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