

**BEFORE THE STATE CORPORATION COMMISSION**  
**OF THE STATE OF KANSAS** DEC 14 2001

In the Matter of the Investigation by the )  
Commission of the Adequacy of Quality of )  
Retail Service Provided by Kansas Electric )  
Public Utilities and the Prudence of )  
Developing Electric Service Quality )  
Standards. )

*Jeffery S. Wasaman* Docket Room

Docket No. 02-GIME-365-GIE

**PETITION FOR INTERVENTION**

**COMES NOW** Kansas Gas Service Company, a Division of ONEOK, Inc. (“Kansas Gas Service”), and pursuant to K.A.R. 82-1-255, and any and all other applicable statutes, regulations, and laws of the State of Kansas, petitions the State Corporation Commission of the State of Kansas (“Commission”) for intervention in the above-entitled docket, and states and alleges as follows:

1. Kansas Gas Service is a natural gas public utility operating in the state of Kansas pursuant to certificates of convenience and necessity issued by the Commission, Kansas Gas Service’s principal place of business is located at 7421 W. 129<sup>th</sup> Street, Overland Park, Kansas, 66213.

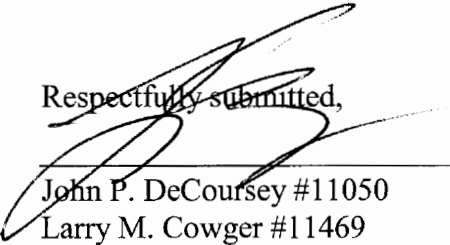
2. Since this docket will investigate quality of service standards for the provisioning of electric service by all electric public utilities in the state of Kansas, Kansas Gas Service will be affected by any order of the Commission issued in this docket as it provides certain customer service functions on a combined basis with Western Resources, Inc.

3. The interests of justice and the orderly and prompt conduct of the proceedings in this docket will not be impaired by allowing the intervention of Kansas Gas Service.

4. Kansas Gas Service requests the right to fully participate in this docket, including, but not limited to the right to conduct discovery, present witness, cross-examine witnesses, present motions and responses and participate in all hearings in the docket, and all other rights that may be granted to interveners under applicable Kansas law.

WHEREFORE, Kansas Gas Service, respectfully requests that the Commission grant its Petition for Intervention in this docket.

Respectfully submitted,

  
\_\_\_\_\_  
John P. DeCoursey #11050  
Larry M. Cowger #11469  
7421 W. 129th Street  
Overland Park, KS 66213-5957  
(913) 319 8610 phone  
(913) 319 8622 fax  
**Attorneys for Kansas Gas Service,  
A Division of ONEOK, Inc.**

**VERIFICATION**

STATE OF KANSAS        )  
                                  ) ss.  
COUNTY OF Shawnee    )

Larry M. Cowger, being duly sworn upon his oath, deposes and states that he is an attorney for Kansas Gas Service Company, A Division of ONEOK, Inc., that he has read and is familiar with the foregoing *Petition for Intervention*, and that the statements made therein are true to the best of his knowledge, information and belief.

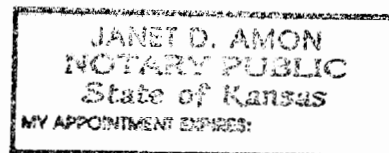
  
\_\_\_\_\_  
Larry M. Cowger

Subscribed and sworn to before me this 14<sup>th</sup> day of December 2001.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires:

10/29/04



**CERTIFICATE OF SERVICE**

I hereby certify that on this 14<sup>th</sup> day of December 2001, a true and correct copy of the above and foregoing *Petition for Intervention* was deposited in the United States mail, first-class postage prepaid, properly addressed to the following:

Tom Stratton  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604

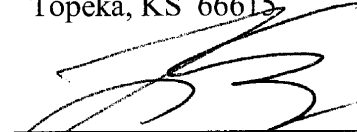
Walker Hendrix  
Citizen's Utility Ratepayer Board  
1500 SW Arrowhead Road  
Topeka, KS 66604

Glenda Cafer  
Cafer Law Offices, LLC  
2401 SW Crest Drive  
Topeka, KS 66614

Mark English  
Kansas City Power & Light  
1201 Walnut  
Kansas City, MO 64106

James G. Flaherty  
Anderson Byrd Richeson Flaherty &  
Henrichs  
216 S. Hickory  
Ottawa, KS 66067

Harold L. Haun  
Kansas Electric Power Cooperative, Inc.  
600 S.W. Corporate View  
Topeka, KS 66615



---

Larry M. Cowger