

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: Thomas E. Wright, Chairman  
Michael C. Moffet  
Joseph F. Harkins

DEC 27 2007

 Docket Room

In the Matter of the Application of Kansas )  
Electric Power Cooperative, Inc. for ) Docket No. 08-KEPE-597-RTS  
Approval to Make Changes in its Charges )  
for Electric Service. )

**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 December 21, 2007, Kansas Electric Power Cooperative, Inc. ("KEPCo" or "Applicant") filed an application with the Kansas Corporation Commission requesting approval to make changes in its charges for electric service.
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,



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David Springe #15619  
Niki Christopher #19311  
C. Steven Rarrick #13127  
Citizens' Utility Ratepayer Board  
1500 SW Arrowhead Road  
Topeka, KS 66604  
(785) 271-3200  
(785) 271-3116 Fax

**VERIFICATION**


STATE OF KANSAS                     )  
   )  
 COUNTY OF SHAWNEE                )        ss:

I, Niki Christopher, of lawful age, being first duly sworn upon her oath states:

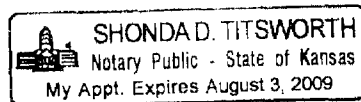
That she is an attorney for the above named petitioner; that she has read the above and foregoing Intervention, and, upon information and belief, states that the matters therein appearing are true and correct.

  
 \_\_\_\_\_  
 Niki Christopher

SUBSCRIBED AND SWORN to before me this 27th day of December, 2007.

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

My Commission expires: 8-03-2009.



**CERTIFICATE OF SERVICE**

08-KEPE-597-RTS

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 27th day of December, 2007, to the following:

Tom Stratton  
Chief Litigation Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027  
\*\*Hand Delivered\*\*

Stephen E. Parr  
Executive Vice President and CEO  
Kansas Electric Power Cooperative, Inc.  
600 S.W. Corporate View  
Topeka, KS 66615

Robert Bowser  
Vice President Regulatory and Technical Services  
Kansas Electric Power Cooperative, Inc.  
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J. Michael Peters  
Vice President, Administration and General Counsel  
Kansas Electric Power Cooperative, Inc.  
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Frank A. Caro, Jr.  
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Shonda Titworth