

STATE CORPORATION COMMISSION

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

DEC 12 2001

**In the Matter of the Investigation by the )  
Commission of the Adequacy of Quality of )  
Retail Service Provided by the 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 LEAVE TO INTERVENE  
BY KANSAS ELECTRIC COOPERATIVES, INC.**

COMES NOW, Kansas Electric Cooperatives, Inc. (hereinafter KEC), and respectfully petitions this Commission for leave to intervene in the above-captioned proceeding on behalf of its member distribution systems. In support of this Petition, KEC states as follows:

1. That on November 16, 2001, the Commission opened a docket for the purposes of considering the adequacy of the quality of retail electric service provided by Kansas electric public utilities and the prudence of developing electric service quality standards.
2. KEC is a statewide service organization for the electric cooperatives in the state of Kansas.
3. That KEC seeks intervention in this proceeding to participate on behalf of the distribution electric cooperatives in this docket. KEC has an interest in these proceedings as the service obligations of its member systems providing electric service could be affected by this proceeding. Granting intervention to KEC will not serve to delay the proceeding and will serve to streamline the proceeding by presenting the views of distribution rural electric cooperatives on a collective basis.

4. That all correspondence, pleadings, orders and other communications concerning this docket should be addressed to Stuart S. Lowry, LOWRY & JOHNSON, P.O. Box 4267, Topeka, Kansas, 66604-0267.

5. For the above-stated reasons, KEC requests intervention in these proceedings.

WHEREFORE, Kansas Electric Cooperatives, Inc., respectfully requests that it be granted leave to intervene without limitation in this matter, and for such other relief as may be proper.

*Stuart S. Lowry*

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Stuart S. Lowry #12482  
LOWRY & JOHNSON  
P.O. Box 4267  
Topeka, Kansas 66604-0267  
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Facsimile: (785) 478-4852

ATTORNEY FOR KANSAS ELECTRIC  
COOPERATIVES, INC.

### VERIFICATION

STATE OF KANSAS            )  
COUNTY OF SHAWNEE    ) ss:

Stuart S. Lowry, being first duly sworn, deposes and says: That he is the attorney for Kansas Electric Cooperatives, Inc.; that he has read the above Petition for Leave to Intervene; and that the statements contained therein are true and correct to the best of his knowledge and belief.

*Stuart S. Lowry*

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Stuart S. Lowry No. 12482

## CERTIFICATE OF MAILING

Stuart S. Lowry states that on the 17 day of December, 2001, a copy of the above and foregoing Petition was mailed by first class mail, postage paid to the following:

Dana Bradbury  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, Kansas 66604

*Stuart S. Lowry*

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Stuart S. Lowry