

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

STATE CORPORATION COMMISSION

DEC 10 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)

Docket No. 02-GIME-365-GIE

Jeffery S. Wasaman Docket Room

**PETITION FOR INTERVENTION AND
MOTION FOR EXTENSION OF TIME TO FILE COMMENTS**

COMES NOW Kansas Electric Power Cooperative, Inc. ("KEPCo"), and pursuant to K.A.R. 82-1-225, and 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. KEPCo is an electric public utility operating in the State of Kansas pursuant to a certificate of convenience and necessity issued by the Commission. KEPCo's principal place of business is located at 600 S.W. Corporate View, Topeka, Kansas 66615.
2. Since this docket will investigate quality of service standards for providing electric service by all electric public utilities in the State of Kansas, KEPCo will be affected by any order of the Commission issued in this docket.
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 KEPCo.
4. KEPCo requests the right to fully participate in this docket under applicable Kansas law.

MOTION FOR EXTENSION OF TIME

5. If KEPCo is granted intervention in this case, then KEPCo moves for an extension of time to respond to Staff's initial position on the issues relative to service quality which are identified in Staff's Response to Order Opening Docket, filed November 30, 2001. In support of its motion, KEPCo states as follows:

6. On November 16, 2001 the Commission issued an Order opening this docket.

7. The Commission's Order instructed the Staff to file its initial position on the issues relative to service quality, and a proposed procedure, by December 1, 2001. Staff filed its Response on November 30, 2001.

8. The Commission also instructed interested utilities to file their initial position on the issues addressed by Staff, and their proposals for a procedural schedule, within 15 days following the filing of the response by Staff. However, Staff stated it had no objection to allowing a reasonable extension of thirty (30) days, for a total of 45 days, following the filing of Staff's Response.

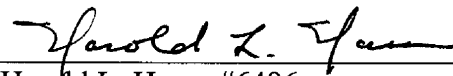
9. KEPCo has just completed the Technical Hearings for a rate case before this Commission and has Briefs due on December 17 and 21, 2001. KEPCo's Board of Trustees will next meet on December 20 to discuss this matter. And, of course, it's the holiday season.

10. KEPCo requests that the Commission issue an order granting its motion and extending its filing date for its initial positions on the issues addressed by Staff and

their proposals for a procedural schedule to January 16, 2002. This request for an extension of time should not prejudice the Commission's investigation in this matter.

WHEREFORE, KEPCo respectfully requests the Commission grant its Petition for Intervention in this Docket, and

If KEPCo is granted intervention status, for the reasons set forth herein, grant KEPCo an extension of time to respond to Staff's initial position on the issues relative to service quality and proposed procedure by January 16, 2002.

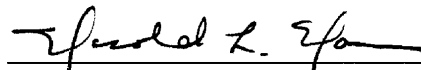


Harold L. Haun, #6496
Kansas Electric Power Cooperative, Inc.
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VERIFICATION

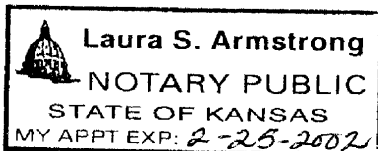
STATE OF KANSAS)
) SS:
COUNTY OF SHAWNEE)

The undersigned, upon oath first duly sworn, states that he is the attorney for Kansas Electric Power Cooperative and that he has read the foregoing Petition for Intervention and Motion for Extension of Time to File Comments, that he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.



Harold L. Haun

Subscribed and sworn to before me this 10th day of December, 2001.





Notary Public

My Appointment Expires:

CERTIFICATE OF SERVICE

I hereby certify that a correct copy of this Petition for Intervention and Motion for Extension of Time to File Comments was sent via U.S. Mail on the 10th of December 2001 to:

Tom Stratton
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Ks 55504

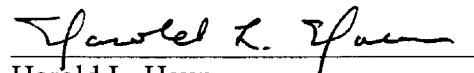
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