BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Kansas)	STATE CURPORATION COMMISSION
Gas Service, a division of ONEOK, Inc.,	
for Approval to Implement the Efficiency)	JAN 2 9 2010
Kansas Energy Efficiency Program, to)	Susan Taluffy
Implement Natural Gas Energy Efficiency)	Juster Thanffy
Programs to Improve Building and)	
Equipment Efficiency and to Educate About)	
Efficient Energy Usage, To Provide for)	
Program Cost Recovery Through a Rider)	Docket No. 10-KGSG-421-TAR
Mechanism, to Establish Administrative)	
Charges and a Program Initiation Fee,)	
Permit the Implementation of a Revenue)	
Decoupling Mechanism, and Appropriate)	
Accounting Authority to Defer Expenses)	
and Revenues Associated with the Filing.)	

PETITION TO INTERVENE OF KANSAS CITY POWER & LIGHT COMPANY

COMES NOW Kansas City Power & Light Company ("KCP&L") and moves the Kansas Corporation Commission ("Commission") for an order permitting it to intervene in the above-captioned matter. In support of its Petition, KCP&L states as follows:

- 1. On December 18, 2009, Kansas Gas Service, a division of ONEOK, Inc. ("KGS") filed an application requesting Commission approval to make certain changes in its charges, practices and programs related to provisioning natural gas service in Kansas.
- 2. KCP&L is a corporation duly organized under the laws of the State of Missouri, with its principal place of business at One Kansas City Place, 1200 Main Street, Kansas City, Missouri, 64141-9679. KCP&L is authorized to do business and is conducting business in the State of Kansas. KCP&L is an electric public utility in Kansas and holds a certificate of convenience and necessity issued by the Kansas Commission.

- 3. As stated in its application, KGS is requesting the Commission consider issues previously addressed in the Commission's Orders in earlier generic proceedings in which KCP&L was an active party, specifically, Docket No. 08-GIMX-441-GIV ("441 Order" and "441 Docket) and Docket No. 08-GIMX-442-GIV ("442 Order" and "442 Docket"). KCP&L was at the forefront of Energy Efficiency/Demand Response ("EE/DR") offerings in Kansas and presently has approximately 13 pilot programs in place under the umbrella of its five-year Regulatory Plan approved on August 5, 2005 in Docket No. 04-KCPE-1025-GIE. Issues posited in KGS' filing, such as cost recovery, administrative charges, program initiation fees, decoupling mechanisms, and accounting authority deferrals, are similar or related to the issues KCP&L must address as it determines the scope of its EE/DR programs going forward. KCP&L is also planning to implement an Efficiency Kansas program similar to a program that has been proposed by KGS in this filing. The Commission's consideration of these issues in KGS' filing could impact KCP&L and its customers in future KCP&L proceedings.
- 4. In addition, KCP&L shares with KGS portions of its certificated territory in Kansas. KCP&L provides electric service to many of KGS' natural gas customers in the Kansas City area. As such, and to a degree, KCP&L and KGS indirectly compete with each other in these overlapping territories. Discounts and other programs offered by KGS could have an impact on KCP&L and its customers.
- 5. For the above reasons, KCP&L has a clear interest in the proceedings in this docket. Accordingly, KCP&L requests permission to intervene to represent its interests and the interests of its shareholders and customers in the State of Kansas. KCP&L's interests herein are not adequately represented by the existing parties.

- 6. This case has only recently been filed and, to date, no proceedings have been held. As such, granting intervention and party status to KCP&L at this time will not impede the progress of the docket or impact its present status.
- 7. All pleadings, orders, notices or other documents should be served on the undersigned counsel, and on the individual named below:

Mary Turner, Regulatory Kansas City Power & Light One Kansas City Place 1200 Main Street – 19th Floor PO Box 418679 Kansas City, Missouri 64141-9679

WHEREFORE, KCP&L requests that the Commission issue an order allowing it to intervene and fully participate in any proceedings in this matter and for such further and other relief as may be appropriate.

Respectfully submitted,

Victoria Schatz, Corporate Counsel Kansas City Power & Light One Kansas City Place 1200 Main Street – 16th Floor PO Box 418679 Kansas City, Missouri 64141-9679

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above Petition to Intervene of KCP&L was hand-delivered or mailed, postage prepaid, on this 29th day of January, 2010 to:

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MATTHEW SPURGIN
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