



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

**AUG 14 2013**

by  
State Corporation Commission  
of Kansas

In the Matter of the Application of )  
Kansas City Power & Light Company )  
for Approval to Modify the Original )  
Budget for its Energy Optimizer )  
Program. )

Docket No. 14-KCPE-098-TAR

**PETITION TO INTERVENE AND MOTION FOR PROTECTIVE ORDER**

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 and motion, 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 August 12, 2013, Kansas City Power & Light Company filed an Application with the Kansas Corporation Commission for approval to Modify the Original Budget for its Energy Optimizer Program.

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. CURB has been an active participant in numerous

dockets addressing energy-efficiency programs and issues, and has a continuing interest in ensuring that the programs funded by ratepayers are effective, economically sound and prudently managed.

5. In addition to undersigned counsel, please include the following CURB representatives with all electronic notices, pleadings, and correspondence regarding this Application as follows:

Shonda Smith	Della Smith
Office Manager	Administrative Specialist
Citizens' Utility Ratepayer Board	Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road	1500 SW Arrowhead Road
Topeka, KS 66604	Topeka, KS 66604
Email: <a href="mailto:sd.smith@curb.kansas.gov">sd.smith@curb.kansas.gov</a>	Email: <a href="mailto:d.smith@curb.kansas.gov">d.smith@curb.kansas.gov</a>

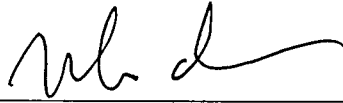
6. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

7. 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.

8. In the filing, portions of the application was filed as confidential information. CURB is requesting the Commission issue a Protective Order in this docket to allow CURB and its consultant access to the full information contained in this filing.

WHEREFORE, CURB RESPECTFULLY REQUESTS THE Commission grant its Petition for Intervention and request for a Protective Order 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:

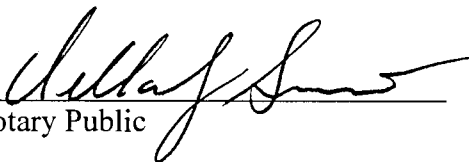
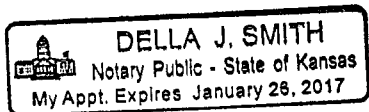
I, Niki Christopher, of lawful age, being first duly sworn upon her oath states:

That she is an attorney for the Citizens' Utility Ratepayer Board, that she has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.



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

SUBSCRIBED AND SWORN to before me this 14<sup>th</sup> day of August, 2013.

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

My Commission expires: 01-26-2017.

CERTIFICATE OF SERVICE

14-KCPE-098-TAR

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, electronic service, or hand-delivered this 14<sup>th</sup> day of August, 2013, to the following:

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Della Smith  
Administrative Specialist