

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: John Wine, Chair
Cynthia L. Claus, Commissioner
Brian J. Moline, Commissioner

STATE CORPORATION COMMISSION

DEC 04 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.)

Jeffrey S. Wagaman Docket Room

Docket No. 02-GIME-365-GIE

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. This docket will investigate quality of service standards for the provisioning of electric service by all electric public utilities in the state of Kansas.
4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas. 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.

CURB moves the Commission for an order allowing it to intervene in this proceeding and to become a party of record with all rights to have notice of and participate in hearings, to present evidence, to cross-examine witnesses, to file briefs and participate in argument, and for all other necessary and proper purposes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Walker Hendrix", with a long horizontal flourish extending to the right.

Walker Hendrix #08835
Niki Christopher #19311
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.

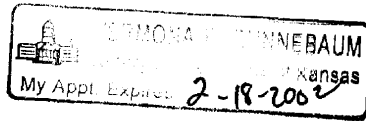


Niki Christopher

SUBSCRIBED AND SWORN to before me this 3rd day of Decmeber, 2001.

Notary of Public 

My Commission expires: 2-18-2002.



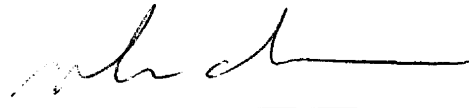
CERTIFICATE OF SERVICE

I, Niki Christopher, hereby certify a true and correct copy of the foregoing, was hand delivered on this ~~7th~~ day of December, 2001 to:

Tom Stratton
Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604
Hand Delivered

Glenda Cafer
Cafer Law Office, L.L.C.
2401 SW Crest Drive
Topeka, KS 66614

Mark English
Kansas City Power & Light
1201 Walnut
Kansas City, MO 64106



Niki Christopher