

STATE CORPORATION COMMISSION

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

JUN 09 2004

In the Matter of the Future Supply, Delivery )  
and Pricing of the Electric Service Provided by )  
Kansas City Power & Light Company )

 Docket  
Room

Docket No. 04-KCPE-1025-GIE

**PETITION TO INTERVENE**

COMES NOW Aquila, Inc. ("Aquila"), d/b/a Aquila Networks - WPK ("WPK"), and pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, petitions the State Corporation Commission of the State of Kansas (Commission) for an order allowing Peoples to intervene in the above-captioned matter.

1. Aquila is a Delaware corporation with its principal office and place of business at 20 West Ninth, Kansas City, Missouri 64138. Aquila is authorized to conduct business in Kansas through its WPK operation division, and as such is engaged in providing electrical utility service to customers in its Kansas service area.

2. WPK is an electric public utility as that term is defined in K.S.A. 66-104 and as such is subject to the jurisdiction of the Commission with regard to its rates for electric service and as otherwise provided by law.

3. WPK provides retail electric service to approximately 68,500 customers in Kansas pursuant to grants of authority from the Commission including electric service to approximately 152 communities in Kansas and other areas in 32 Kansas counties.

4. On May 18, 2004, Kansas City Power & Light Company ("KCPL") filed a request with the Commission to open an investigatory docket and to establish an informal panel discussion process. The purpose of the investigatory docket and informal panels will be to discuss and gain consensus on, constructive regulatory responses to emerging issues that will affect the supply, delivery and pricing

of the electric service provided by KCPL.

5. Aquila is requesting permission to intervene herein to represent the interests of its customers in Kansas.

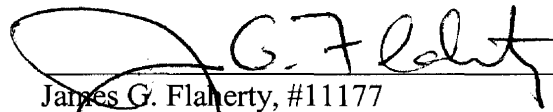
6. Aquila's interest herein is not adequately represented by the existing parties.

7. All communications and correspondence to Aquila, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

Mr. W. Scott Keith, Manager  
Aquila, Inc.  
10700 East 350 Highway  
P. O. Box 11739  
Kansas City, Missouri 64138

James G. Flaherty  
Anderson & Byrd, LLP  
216 S. Hickory, P. O. Box 17  
Ottawa, Kansas 66067

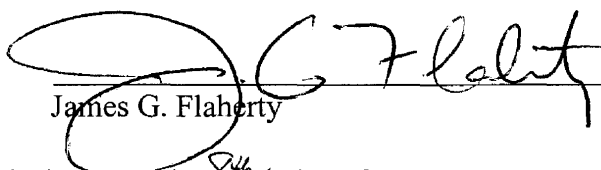
WHEREFORE, Aquila prays that the Commission enter an Order allowing it to intervene herein and for all other relief which the Commission deems just and proper.

  
James G. Flaherty, #11177  
**ANDERSON & BYRD, LLP**  
216 S. Hickory, P. O. Box 17  
Ottawa, Kansas 66067  
(785) 242-1234  
Attorneys for Aquila, Inc., d/b/a Aquila Networks - WPK

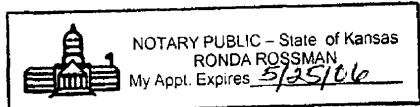
VERIFICATION


STATE OF KANSAS            )  
  )ss:  
FRANKLIN COUNTY         )

James G. Flaherty, of lawful age, being first duly sworn on oath, states: That he is an attorney for Aquila, Inc., d/b/a Aquila Networks - WPK; that he has read the above and foregoing Petition to Intervene, knows the contents thereof; and that the statements contained therein are true.

  
James G. Flaherty

SUBSCRIBED AND SWORN to before me this 8<sup>th</sup> day of June, 2004.



  
Notary Public

My Commission Expires:

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was mailed, postage prepaid, this <sup>8/13</sup> day of June, 2004, addressed to:

Niki Christopher, Attorney  
Citizens' Utility Ratepayer Board  
1500 Sw Arrowhead Road  
Topeka, KS 66604

David Springe, Consumer Counsel  
Citizens' Utility Ratepayer Board  
1500 Sw Arrowhead Road  
Topeka, KS 66604

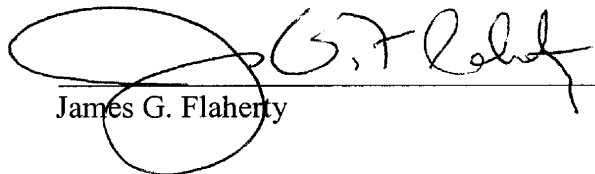
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Overland Park, KS 66211

  
James G. Flaherty