


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

JUL 28 2009



In the Matter of the Applications of Westar)
Energy, Inc. and Kansas Gas and Electric) Docket No. 09-WSEE-925-RTS
Company for Approval to Make Certain)
Changes in their Charge for Electric Service.)

PETITION TO INTERVENE

COMES NOW Unified School District No. 259 (“U.S.D. 259”) and in support of its Petition to Intervene states as follows:

1. U.S.D. 259 is in the business of operating public schools at more than 100 sites in the Wichita area. In order to operate said public schools, U.S.D. 259 obtains electric services from Westar Energy.

2. The issues raised in this matter and the Commission’s determination of said issues will have a substantial impact on the rates which U.S.D. 259 will pay for its electric service. Therefore, U.S.D. 259 has an interest in the outcome of this proceeding. U.S.D. 259 is not now and will not be adequately represented by any other party to this proceeding.

3. Pursuant to K.S.A. § 66-117f, K.S.A. § 77-521, and K.A.R. § 82-1-225, U.S.D. 259 is entitled to intervene herein.

4. No party to this proceeding will be prejudiced by granting the requested intervention.

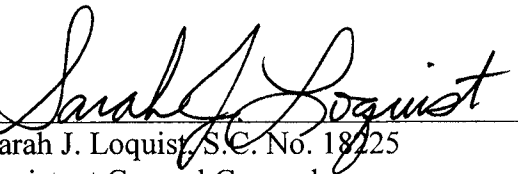
5. All communications and correspondence to U.S.D. 259, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

Sarah J. Loquist
Assistant General Counsel
Unified School District No. 259
201 N. Water
Wichita, Kansas 67202-1292
Telephone: (316) 973-4700
Facsimile: (316) 973-4497
E-mail: sloquist@usd259.net

David Banks, Energy Manager
Energy Education/Management
School Service Center Complex
3850 North Hydraulic
Wichita, Kansas 67219-3399
Facsimile: (316) 973-2150
E-mail: dbanks@usd259.net

WHEREFORE, U.S.D. 259 moves the Commission for an Order allowing it to intervene in this case and to become a party of record with all rights to have notice and fully participate in this matter, including, but not limited to, the right to file briefs and motions, to participate in argument, and to conduct discovery, and for all other necessary and proper purposes.

Respectfully Submitted,

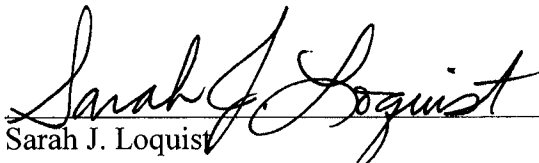
By 

Sarah J. Loquist, S.C. No. 18225
Assistant General Counsel
Unified School District No. 259
201 N. Water
Wichita, Kansas 67202-1292
Telephone: (316) 973-4700
Facsimile: (316) 973-4497

VERIFICATION

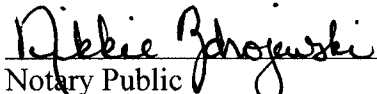
STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Sarah J. Loquist, being duly sworn upon her oath deposes and says that she is one of the attorneys for Unified School District No. 259; that she is familiar with the foregoing **Petition to Intervene**; and that the statements therein are true and correct to the best of her knowledge and belief.



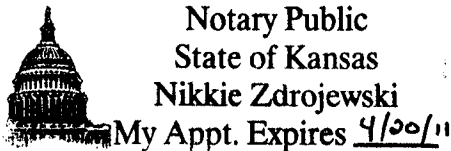
Sarah J. Loquist

SUBSCRIBED AND SWORN to before me this 28th day of July, 2009.



Notary Public

My Appointment Expires:
April 20, 2011


Notary Public
State of Kansas
Nikkie Zdrojewski
My Appt. Expires 4/20/11

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 28th day of July, 2009, one copy of the foregoing **Petition to Intervene** was sent via facsimile and the original and seven copies were sent via U.S.

Mail, postage prepaid, addressed to:

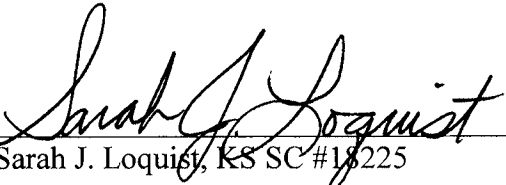
Susan K. Duffy, Executive Director
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, Kansas 66604-4027

and that one copy was sent via U.S. Mail, postage prepaid, addressed to:

David Springe
Niki Christopher
C. Steven Rarrick
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604

Martin J. Bregman
Cathy J. Dinges
Westar Energy, Inc.
818 S Kansas Avenue
P.O. Box 889
Topeka, KS 66601-0889

Dana Bradbury
Matthew Spurgin
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027


Sarah J. Loquist, KS SC #18225



Division of Legal Services
Sarah J. Loquist – Assistant General Counsel
sloquist@usd259.net

Phone (316) 973-4700
Fax (316) 973-4497

July 28, 2009

VIA FIRST CLASS MAIL

Susan K. Duffy
Executive Director
Kansas Corporation Commission
1500 S.W. Arrowhead Rd.
Topeka, KS 66604

STATE CORPORATION COMMISSION

JUL 28 2009

Re: *In the Matter of the Applications of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval to Make Certain Changes in their Charges for Electric Service.*

KCC Docket No.: 09-WSEE-925-RTS

Dear Ms. Duffy:

Please find enclosed the original and seven (8) copies of Unified School District No. 259's Petition to Intervene which was filed today via facsimile in the above-referenced matter. Please return a file-stamped copy to us in the prepaid envelope. If you have any questions or concerns, please do not hesitate to contact us.

Thank you for your assistance.

Very truly yours,

Sarah J. Loquist
Assistant General Counsel

SJL/nkz
Enclosure
cc: Service List