2013.08.05 15:00:07 Kansas Corporation Commission /S/ Kim Christians **390/vsd**

THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

AUG 0 5 2013

In the Matter of the Application of)	by State Corporation Commission of Kansas
Kansas City Power & Light Company)	Docket No. 14-KCPE-042-TAR
for Approval to Extend Its Demand-Side Management Programs.)	

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. On July 18, 2013, Kansas City Power and Light Company filed an application with the Commission for Approval to Extend Its Demand-Side Management Programs.
- 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 was a co-signer on the Joint Motion of Kansas

City Power and Light Company, Commission Staff, and The Citizens' Utility Ratepayer Board for Stay of Proceeding and Interim Order filed with the KCC Commission on July 18, 2013.

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
Office Manager
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
Email: sd.smith@curb.kansas.gov

Della Smith Administrative Specialist Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 Email: d.smith@curb.kansas.gov

- 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.

WHEREFORE, CURB RESPECTFULLY REQUESTS THE Commission grant its Petition for Intervention in this Docket.

Respectfully submitted,

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

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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 5th day of August, 2013.

DELLA J. SMITH
Notary Public - State of Kansas
My Appt. Expires January 26, 2017

Notary Public

My Commission expires: <u>01-26-2017</u>.

CERTIFICATE OF SERVICE

14-KCPE-042-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 5th day of August, 2013, to the following parties:

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Della Smith

Administrative Specialist