

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

MAR 11 2009

Susan K. Duffe Docket Room

In the Matter of the Investigation of Westar)
Energy, Inc., and Kansas Gas and Electric) Docket No. 09-WSEE-641-GIE
Company to Consider the Issue of Rate)
Consolidation and Resulting Rate Design.)
)

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.

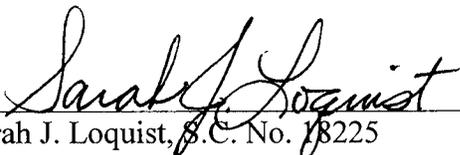
5. All communications and correspondence to U.S.D. 259, including service of all notices and orders of the Commission herein are requested to be sent to the following named individuals:

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.

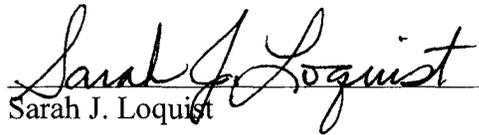
Respectfully Submitted,

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.

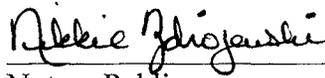


Sarah J. Loquist

SUBSCRIBED AND SWORN to before me this 11th day of March, 2009.



Notary Public
State of Kansas
Nikkie Zdrojewski
My Appt. Expires 4/20/2011



Notary Public

My Appointment Expires:

April 20, 2011

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 11th day of March, 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:

Kurt J. Boehm, Attorney
Michael L. Kurtz, Attorney
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OH 45202

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

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

Mark A. Ruelle, Vice President/Treasurer
Martin J. Bregman, Exec Dir, Law
Cathy J. Dinges, Corporate Counsel
Westar Energy, Inc.
818 S Kansas Avenue
P.O. Box 889
Topeka, KS 66601-0889



Sarah J. Loquist, KS SC #18225