

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

JUN 24 2004

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

Docket No. 04-KCPE-1025-GIE

 Docket
Room

PETITION FOR INTERVENTION

COMES NOW Sprint, and states and alleges to the State Corporation Commission of the State of Kansas ("Commission" or "KCC") as follows:

1. Sprint is a global integrated communications provider serving more than 26 Million customers in over 100 countries. The corporate world headquarters office of Sprint is located at 6220 Sprint Parkway, Overland Park, Kansas 66251.
2. Kansas City Power & Light Company ("KCP&L") is the supplier of retail electric energy to Sprint at its corporate world headquarters office located in Overland Park, Kansas.
3. On information and belief, the Sprint corporate world headquarters office located in Overland Park, Kansas is the largest retail electric customer of KCP&L in the State of Kansas.
4. On May 18, 2004, KCP&L filed its "Application to Establish Investigatory Docket and Informal Panel Discussion Process Regarding Kansas City Power & Light Company."

5. In the described Application, KCP&L contends, in part, as follows:

(a) More capacity will be required to supply KCP&L's customers in the foreseeable future;

(b) KCP&L can reduce the emissions from its existing coal-fired plants, and will be required to do so in the future;

(c) KCP&L and its stakeholders have a mutual interest in price stability; and

(d) Interest exists for a renewed focus on demand-side management programs and evaluation of new technologies for energy and account management.

6. In the described Application, KCP&L states that it is now prepared to continue with its strategic planning initiatives regarding generation capacity additions, the reduction of emissions, price stability, and demand-side management programs.

7. As a retail electric customer of KCP&L, the legal rights, duties, privileges, immunities and other legal interests of Sprint may be substantially affected by this Proceeding.

8. No party other than Sprint can adequately represent the interests of Sprint in this Proceeding.

9. Granting intervention to Sprint in this Docket is in the interest of justice and will not impair the orderly and prompt conduct of the proceedings in this Docket.

WHEREFORE, Sprint respectfully requests that it be granted Intervention in this Docket, and that as an Intervenor, Sprint be granted full rights of participation in this Docket, including but not limited to, the right to conduct relevant discovery related to the

issues pending in this Docket, the right to present and sponsor witnesses and evidence, the right to cross-examine witnesses, the right to file Briefs and Pleadings in this Docket, and the right to offer oral argument and participate in hearings.

Respectfully submitted,

SMITHYMAN & ZAKOURA, CHARTERED

By 
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ATTORNEYS FOR SPRINT

VERIFICATION

STATE OF KANSAS)
) SS.
COUNTY OF JOHNSON)

I, James P. Zakoura, being first duly sworn, state that the above and foregoing PETITION FOR INTERVENTION, is true and accurate to the best of my knowledge, information and belief.

James P. Zakoura
James P. Zakoura

Subscribed and sworn to before me this 24th day of June, 2004.

Bernadine K. Farley
Notary Public

My Appointment Expires:

October 20, 2005



CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing PETITION FOR INTERVENTION was served on the following parties by depositing in the United States mail, first class, postage prepaid, except as otherwise noted, on this 24~~th~~ day of June, 2004, addressed to the following:

Susan Duffy
Executive Director
Kansas Corporation Commission
1500 Southwest Arrowhead Road
Topeka, KS 66604
(Via Facsimile and by U.S. Mail)

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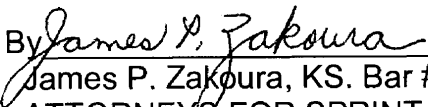
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June 24, 2004

**VIA FACSIMILE TRANSMISSION
CONFIRMED VIA FIRST CLASS MAIL**

Ms. Susan Duffy
Executive Director
Kansas Corporation Commission
1500 Southwest Arrowhead Road
Topeka, KS 66604

STATE CORPORATION COMMISSION

JUN 24 2004

Re: Docket No. 04-KCPE-1025-GIE

 Docket
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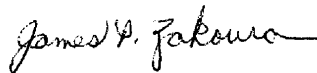
Dear Ms. Duffy:

Please accept for immediate fax filing in the above-referenced docket, the PETITION FOR INTERVENTION.

The original and eight copies of the described pleading are being forwarded to you this date, in accordance with Commission regulations. Please return a copy of the pleading "filed" stamped at your earliest convenience.

Thank you for your consideration in this matter.

Very truly yours,



James P. Zakoura
for
SMITHYMAN & ZAKOURA, CHARTERED

JPZ:pae
Enclosures