

Received
on

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

MAY 31 2011

by
State Corporation Commission
of Kansas

In the Matter of the Application of Kansas)
City Power & Light Company for Approval) Docket No. 11-KCPE-780-TAR
to Transition to Permanent Status Certain)
Demand Side Management Programs.)

PETITION TO INTERVENE AND MOTION FOR PROTECTIVE ORDER

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 and motion, 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 May 27, 2011, Kansas City Power and Light Company (KCP&L) filed an application with the Commission for Approval to Transition to Permanent Status Certain 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.

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	Della Smith
Office Manager	Administrative Specialist
Citizens' Utility Ratepayer Board	Citizens' Utility Ratepayer Board
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Topeka, KS 66604	Topeka, KS 66604
Email: sd.smith@curb.kansas.gov	Email: d.smith@curb.kansas.gov

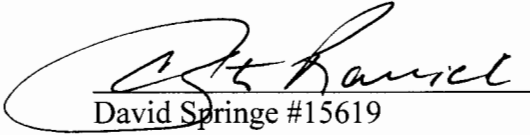
6. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

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.

8. In the filing, the schedules attached to the direct testimony of Jason D. Jones on behalf of KCP&L were filed as confidential information. CURB is requesting the Commission issue a Protective Order in this docket to allow CURB and its consultant access to the full information contained in this filing.

WHEREFORE, CURB RESPECTFULLY REQUESTS THE Commission grant its Petition for Intervention and request for a Protective Order in this Docket.

Respectfully submitted,



David Springe #15619

C. Steven Rarrick #13127

Niki Christopher #19311

Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

Topeka, KS 66604

Telephone: (785) 271-3200

Facsimile: (785) 271-3116

VERIFICATION

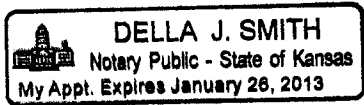
STATE OF KANSAS)
COUNTY OF SHAWNEE) ss:

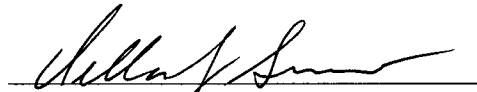
I, C. Steven Rarrick, of lawful age, being first duly sworn upon his oath states:

That he is an attorney for the Citizens' Utility Ratepayer Board, that he has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.


C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 31st day of May, 2011.




Notary Public

My Commission expires: 01-26-2013.

CERTIFICATE OF SERVICE

11-KCPE-780-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, electronic service, or hand-delivered this 31st day of May, 2011, to the following:

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