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Filed Date: 11/12/2014
State Corporation Commission
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November 12, 2014

Tom Day
Acting Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

Re: KCC Docket No. 15-CHNE-175-MIS

Dear Mr. Day:

Attached is Southwestern Bell Telephone Company's Petition for Intervention for electronic filing in the above referenced docket.

Sincerely,

Bruce A. Ney
General Attorney

Enc.

cc: Parties of Record

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

In the Matter of the Application of the)
City of Chanute, Kansas for Approval)
Under K.S.A. 10-1203 to Issue) Docket No. 15-CHNE-175-MIS
Revenue Bonds.)

**PETITION FOR INTERVENTION OF
SOUTHWESTERN BELL TELEPHONE COMPANY**

COMES NOW Southwestern Bell Telephone Company ("SWBT"), pursuant to K.A.R. 82-1-225, and hereby requests that it be granted leave to intervene in the above-captioned Commission proceeding. In support of its petition, SWBT shows the Commission as follows:

1. On October 21, 2014, the City of Chanute, Kansas ("Chanute" or "City") filed its Application for Commission approval of its plan to finance some or all of a planned fiber optic network expansion to all businesses and residents in the City's utility service area.¹

2. This proceeding was commenced pursuant to K.S.A.10-1203, which requires a municipality to obtain Commission approval when issuing revenue bonds to acquire, construct, reconstruct, alter, repair, improve, extend or enlarge any plant or facilities for the furnishing of any utility service where same is being furnished by a private utility, except upon approval by the corporation commission

¹ Application, *In the Matter of the Application of the City of Chanute, Kansas for Approval Under K.S.A. 10-1203 to Issue Revenue Bonds*, Docket No. 15-CHNE-175-MIS, filed Oct. 21, 2014 at ¶2 [hereinafter the "Application"].

of the State of Kansas, after a finding based on substantial evidence that the acquisition, construction, reconstruction, alteration, repair, improvement, extension or enlargement of such plant or facilities is necessary or appropriate for the municipality and its consumers, and for the protection of investors and will not result in duplication of existing utility services in the area served or to be served by the municipality.²

3. SWBT is the incumbent electing carrier providing switched local exchange service within the State of Kansas, including the Chanute, Kansas local exchange area and, specifically, the City of Chanute, Kansas, and the area shown on Exhibit A to the Application. SWBT owns telecommunications facilities, offers services and has employees in the area described by and subject to the Application.

4. SWBT's interests and those of its customers may be affected by any order or determination of the Commission as may hereafter be adopted in the above-captioned proceeding.

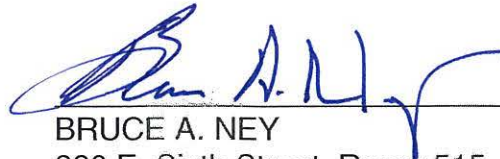
5. SWBT seeks leave to intervene in the above-captioned proceeding as its legal rights, duties and other legal interests may be substantially affected by any determination or Commission Order issued as a result of the proceeding. No other party hereto is able to effectively protect the rights and interests of SWBT in the instant proceeding.

6. SWBT's petition is timely filed and its intervention will not impair the orderly and prompt conduct of any proceedings pertaining to the above-captioned matter.

² K.S.A. 10-1203.

WHEREFORE, for the above and foregoing reasons SWBT respectfully requests that the Commission grant its Petition for Intervention in the above-captioned matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Bruce A. Ney", is written over a horizontal line.

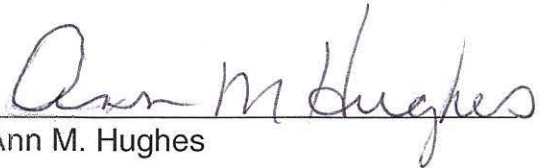
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VERIFICATION

STATE OF KANSAS)
) SS:
COUNTY OF SHAWNEE)

I, Ann M. Hughes, of lawful age, and being first duly sworn, now state: I am Director, Regulatory Affairs, and have read the above Petition for Intervention of Southwestern Bell Telephone Company, and verify the statements contained herein to be true and correct to the best of my knowledge and belief.


Ann M. Hughes

Subscribed and sworn to before me this 12th day of November, 2014.




Notary Public

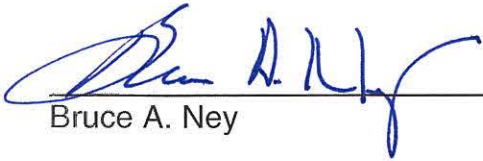
My Appointment Expires: October 15, 2018

CERTIFICATE OF SERVICE

I hereby certify that a correct copy of Southwestern Bell Telephone Company's Petition to Intervene was sent via electronic mail or hand-delivered on this 12th day of November, 2014, to:

MICHAEL NEELEY
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