

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: Brian J. Moline, Chair
Robert E. Krehbiel
Michael C. Moffet

JAN 18 2005

 Docket Room

In the Matter of the Application of Kansas)
Gas Service, a Division of ONEOK, Inc. for) Docket No. 05-KGSG-580-HED
Approval of a Hedge Program for Gas)
Purchased for the Winter Heating Season.

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 January 14, 2005, Kansas Gas Service, a Division of ONEOK, Inc. filed its application for an order approving its request to establish a Gas Hedge Program which will enable the Company to take the necessary steps to limit the volatility of gas prices during the winter heating season. Pursuant to the application, the Company is requesting the authority to collect \$14.0 million dollars annually from its customers to purchase hedging instruments to limit the volatility of the price of gas to its customers during the winter heating months of November

through March.

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

6. 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,



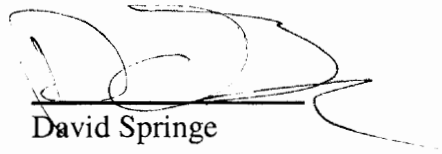
David Springe #15619
Niki Christopher #19311
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
(785) 271-3200
(785) 271-3116 Fax

VERIFICATION

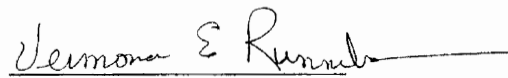
STATE OF KANSAS)
)
) ss:
COUNTY OF SHAWNEE)

I, David Springe, of lawful age, being first duly sworn upon his oath states:

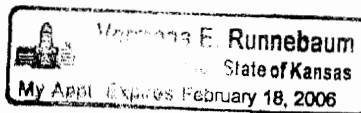
That he is an attorney for the above named petitioner; that he has read the above and foregoing Intervention, and, upon information and belief, states that the matters therein appearing are true and correct.


David Springe

SUBSCRIBED AND SWORN to before me this 18th day of January, 2005


Notary of Public

My Commission expires: 2/18/06



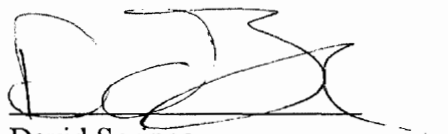
CERTIFICATE OF SERVICE

I, David Springe, hereby certify a true and correct copy of the foregoing, was hand delivered, or placed in the United States mail, postage prepaid, on this 18th day of January 2005 to:

Otto Newton
Kansas Corporation Commission
1500 S.W. Arrowhead Rd.
Topeka, KS 66604
Hand Delivered

Jonh DeCoursey
Director Law
Kansas Gas Service, A Division of ONEOK, Inc.
PO Box 25957
Overland Park, KS 66225-5957

Walker Hendrix
Director Regulatory Law
Kansas Gas Service, A Division of ONEOK, Inc.
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David Springe