

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners:

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

MAY 16 2006

 Docket  
Room

In the Matter of the Application of Kansas )  
Gas Service, a Division of ONEOK, Inc., for ) Docket No. 06-KGSG-1209-RTS  
Adjustments of Its Natural Gas Service in )  
the State of Kansas.

**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:

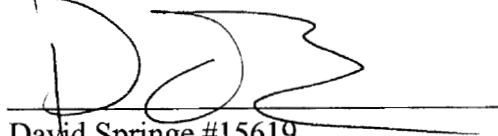
1. CURB is composed of five volunteer consumer advocate members and is statutorily authorized to represent the interests of Kansas residential and small commercial ratepayers in utility proceedings.
2. CURB's Consumer Counsel has been given the discretion to intervene and represent the interests of Kansas residential and small commercial ratepayers in any utility proceeding before the Commission under K.S.A. 66-1223 et seq.
3. On May 15th, 2006, Kansas Gas Service, a division of ONEOK, Inc., filed an application with the Kansas Corporation Commission to make changes for natural gas service.
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,

A handwritten signature in black ink, appearing to read 'D Springe', is written over a horizontal line.

David Springe #15619

Niki Christopher #19311

C. Steven Rarrick #13127

Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

Topeka, KS 66604

(785) 271-3200

(785) 271-3116 Fax

**CERTIFICATE OF SERVICE**

06-KGSG-1209-RTS


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, or hand-delivered this 16th day of May, 2006, to the following:

Susan Duffy  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604  
\*\*Hand Delivered\*\*

Walker Hendrix  
John P. DeCoursey  
Kansas Gas Service  
a division of ONEOK, Inc.  
7421 W. 129<sup>th</sup> St.  
Overland Park, KS 66213

Michael Lennen  
Morris, Laing, Evans, Brock & Kennedy Chartered  
300 North Mead, Suite 200  
Wichita, KS 67202

Larry Willer  
Manager Regulation and Rates  
7421 W. 129<sup>th</sup> St.  
Overland Park, KS 66213

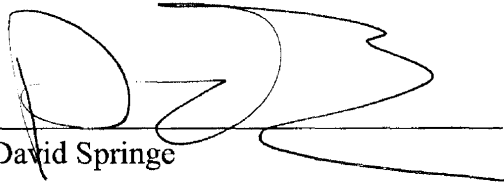
  
Shonda Titsworth

**VERIFICATION**

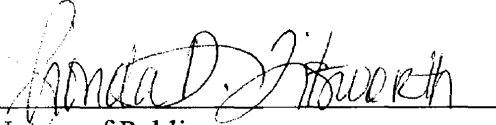
STATE OF KANSAS )  
 ) ss:  
COUNTY OF SHAWNEE )

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 16th day of May, 2006.

  
Notary of Public

My Commission expires: 8-03-2009.

