

**ENTERED**

**APR 13 2005**

2006.05.10 15:21:13  
Kansas Corporation Commission  
/S/ Susan K. Duffy

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

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

APR 12 2005

*Susan K. Duffy* Docket Room

In the Matter of the Complaint of Aquila, )  
Inc. against ONEOK Field Services ) Docket No. 05-CONS-222-CMSC  
Company, requesting an emergency order of )  
the Commission directing ONEOK Field )  
Services to continue to serve Aquila's )  
customers if gas supply is not in a dangerous )  
condition and requesting joinder of this )  
matter with Docket No. 05-CONS-214- )  
CMSC. )

**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 March 24, 2005, Aquila, Inc., pursuant to K.S.A. 77-536, filed its complaint against ONEOK Field Services Company, Motion for Emergency Relief and Motion for Joinder of Proceedings.

4. CURB is requesting permission to intervene in this docket to represent the interests of Aquila's 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, Niki Christopher, of lawful age, being first duly sworn upon her oath states:

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



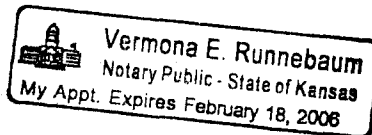
Niki Christopher

SUBSCRIBED AND SWORN to before me this 12<sup>th</sup> day of April, 2005.



Notary of Public

My Commission expires:



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing docket was placed in the United States mail, postage prepaid, or hand-delivered on this 12<sup>th</sup> day of April, 2005 to the following:

Susan Cunningham, General Counsel  
Kansas Corporation Commission  
1500 SW Arrowhead Rd.  
Topeka, KS 66604  
\*\* hand delivered\*\*

Lynn W. Hursh  
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Kansas City, MO 64108

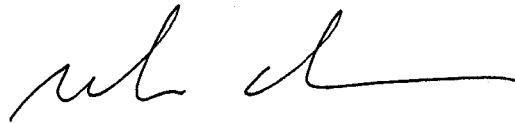
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Niki Christopher