

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Received
on

AUG 27 2012

by
State Corporation Commission
of Kansas

In the Matter of An Investigation to)
Determine the Assessment Rate and the) Docket No. 13-GIMT-130-GIT
Affordable Local Service Rates for Rate-of-)
Return Regulated Carriers for the)
Seventeenth Year of the Kansas Universal)
Service Fund, Effective March 1, 2013.)

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 August 21, 2012, the Commission opened an investigation to determine the assessment rate and the affordable local service rates for rate-of-return regulated carriers for the seventeenth year of the Kansas Universal Service Fund, Effective March 1, 2013.

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
Office Manager
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
Email: sd.smith@curb.kansas.gov

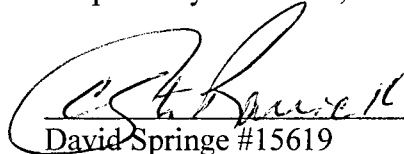
Della Smith
Administrative Specialist
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
Email: d.smith@curb.kansas.gov

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.

WHEREFORE, CURB RESPECTFULLY REQUESTS THE Commission grant its Petition for Intervention in this Docket.

Respectfully submitted,



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

VERIFICATION

STATE OF KANSAS

)

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SS:

COUNTY OF SHAWNEE

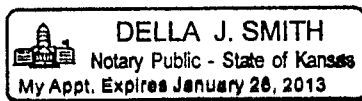
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I, C. Steven Rarrick, of lawful age, being first duly sworn upon his oath states:

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.


G. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 27th day of August, 2012.




Notary Public

My Commission expires: 01-26-2013.

CERTIFICATE OF SERVICE

13-GIMT-130-GIT

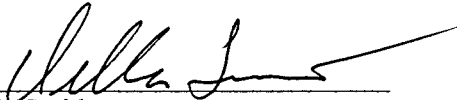
I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid or hand-delivered this 27th day of August, 2012, to the following:

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Hand Delivered



Della Smith
Administrative Specialist