

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Filing of Written)
Documents and Gas Purchase Reports by)
Kansas Gas Service Company, a Division of) Docket No. 02-KGSG-414-GPR
ONEOK, Inc. as Prescribed by Commission)
Order Dated June 21, 2001 in Docket No.)
106,850-U/75-GIMC-009-GIG.)

CURB MOTION FOR DISCOVERY ORDER

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB"), hereby moves the Corporation Commission of the State of the Kansas ("Commission") to issue a Discovery Order in this docket.

1. On December 5, 2001, Kansas Gas Service Company, a Division of ONEOK, Inc. filed an application with the Kansas Corporation Commission at the request of the Commission to open a utility-specific docket for Kansas Gas Service to utilize in filing its monthly contract summary filings and its annual written report relating to supply and transportation contracts and purchasing practices. The Application was filed in accordance with the Order issued by the Commission in KCC Docket No. 106,850-U (75-GIMC-009-GIG) on June 21, 2001.

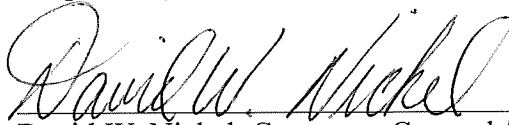
2. On January 4, 2002, the Commission granted CURB full intervention in the above mentioned docket, but reminding CURB that the Commission may, at any time, limit its participation.

3. Due to volatility in the natural gas marketplace, gas purchasing has become a complex and dynamic process requiring CURB's knowledge of all reasonably pertinent information in order to protect residential and small commercial ratepayers. Indeed the Kansas Corporation Commission

Staff has recently issued data requests in this docket. Therefore, CURB is requesting the Commission to issue a Discovery Order in this docket to allow CURB and its consultant access to the full information contained in this filing.

WHEREFORE, CURB respectfully requests that the Commission issue the requested Discovery Order in this docket.

Respectfully submitted,

A handwritten signature in cursive script, reading "David W. Nickel", written in black ink over a horizontal line.

David W. Nickel, Consumer Counsel #11170

Todd E. Love, Attorney #13445

Joseph R. Astrab, Attorney #26414

Citizens' Utility Ratepayer Board

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VERIFICATION

STATE OF KANSAS

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SS:

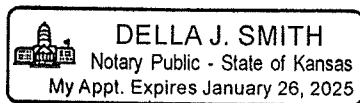
COUNTY OF SHAWNEE


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I, David W. Nickel, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.

David W. Nickel
David W. Nickel

SUBSCRIBED AND SWORN to before me this 30th day of August, 2022.




Notary Public

My Commission expires: 01-26-2025.

CERTIFICATE OF SERVICE

02-KGSG-414-GPR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 30th day of August, 2022, to the following:

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Della Smith
Senior Administrative Specialist