

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners:

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

SEP 01 2005

 Docket Room

In the Matter of a General Investigation into )  
The Commission's Telephone Billing )  
Practices Standards. )

Docket No. 06-GIMT-187-GIT

**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 31, 2005, the State Corporation Commission of the State of Kansas issued an order in the above docket for a general investigation into the Commission's telephone billing practices standards.

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.

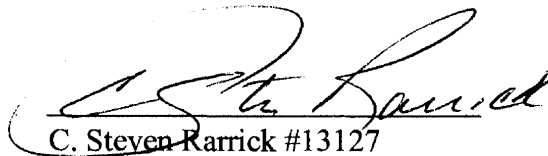
5. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

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.

7. Paragraph 5 of the Commission's Order Opening Docket and Scheduling Comments encourages carriers to participate in this docket and allows carriers to file a simple entry of appearance without filing formal petitions to intervene. However, it not clear this expedited procedure was intended to apply to intervention by CURB.

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 "C. Steven Rarrick", is written over a horizontal line.

C. Steven Rarrick #13127

David Springe #15619

Citizens' Utility Ratepayer Board

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(785) 271-3200

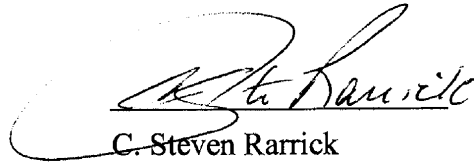
(785) 271-3116 Fax

VERIFICATION

STATE OF KANSAS            )  
  )  
COUNTY OF SHAWNEE    )        ss:

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

That he is an attorney for the Citizens' Utility Ratepayer Board; that he has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.

  
C. Steven Rarrick

SUBSCRIBED AND SWORN to before me this 1st day of September, 2005.

  
Notary Public

My Commission expires: 8-03-2009

