

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners:

John Wine, Chair
Cynthia L. Claus, Commissioner
Brian J. Moline, Commissioner

STATE CORPORATION COMMISSION

DEC 13 2001

In the Matter of the Filing of Written)
Documents and Gas Purchase Reports by)
Greeley Gas Company, a division of Atmos)
Energy Corporation, as Prescribed by)
Commission Order dated June 21, 2001 in)
Docket No. 106,850-U/75-GIMC-009-GIG.

Jeffery S. Wasaman Docket Room

Docket No. 02-GRLG-364-GPR

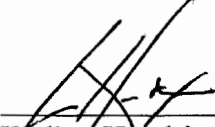
PETITION FOR LEAVE TO INTERVENE

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB") and moves the Kansas State Corporation Commission ("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. On November 16, 2001, Greeley Gas Company, a division of Atmos Energy Corporation ("Greeley") filed their request for the Kansas Corporation Commission to open a utility-specific docket for Greeley to utilize in filing its monthly contract summary filings and its annual written report relating to supply and transportation contracts and purchasing practices. This application was filed in accordance with the Order issued by the Commission in KCC Docket No. 106,850-U on June 21, 2001..
3. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers in the area described in the above caption. The rates paid and service received by those customers will or may be affected by the Commission order in this proceeding.
4. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.
5. The residential ratepayers and small businesses whose interests CURB represents will or may be bound by a Commission order 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




Walker Hendrix #08835
Niki Christopher # 19311
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604

VERIFICATION

STATE OF KANSAS)
)
COUNTY OF SHAWNEE) ss:

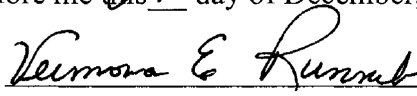
Walker Hendrix, of lawful age, being first duly sworn upon her oath states:

That he is an attorney for the above named petitioner; that he has read the above and foregoing Petition for Leave to Intervene and, upon information and belief, states that the matters therein appearing are true and correct.



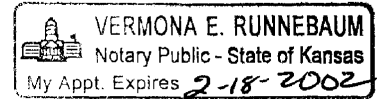
Walker Hendrix

SUBSCRIBED AND SWORN to before me this 13th day of December, 2001.



Notary of Public

My Commission expires: 2-18-2002.



CERTIFICATE OF SERVICE

I, Walker Hendrix, hereby certify a true and correct copy of the foregoing Intervention, was placed in the United States mail, postage pre-paid on this 12 day of December, 2001 to all parties on the Commission's Official Mailing list.

Susan Cunningham
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604

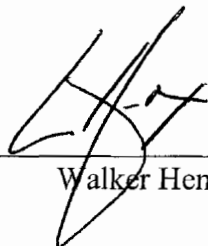
Joe T. Christian
Greeley Gas Company
Penn Center, Suite 800
1301 Pennsylvania St.
Denver, CO 80203-5015

James G. Flaherty
Anderson Byrd Richeson Flaherty &
Henrichs
P.O. Box 17
Ottawa, KS 66067

James W. Bartling
Manager of Public Affairs
Greeley Gas Company
730 North Ridgeview
Olathe, KS 66061

Douglas C. Walther
Senior Attorney
Atmos Energy Corp.
P.O. Box 650205
Dallas, TX 75265

John W. Hack
Director of Gas Supply Planning
Atmos Energy Corp.
P.O. Box 650205
Dallas, TX 75265-0205



Walker Hendrix