2012.05.22 15:01:58 Kansas Corporation Commission /S/ Patrice Pe**Pepeye**d-Klein

# THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

MAY 2 2 2012

	State Corporation Commission of Kansas
In the Matter of the Application of Kansas Gas Service, a Division of ONEOK, Inc., for Adjustments of its Natural Gas Rates in the State of Kansas.	)     Docket No. 12-KGSG-835-RTS ) )

### **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 May 18, 2012, Kansas Gas Service, a Division of ONEOK, Inc. filed an application with the Kansas Corporation Commission for adjustments of its Natural Gas Rates in the State of Kansas.
- 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
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- 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	
COUNTY OF SHAWNEE	) ss: )
I, Niki Christopher, of lawful age, b	being first duly sworn upon her oath states:
•	ove named petitioner; that she has read the above and ion and belief, states that the matters therein appearing are  Niki Christopher
SUBSCRIBED AND SWORN to b	before me this 22 <sup>nd</sup> day of May, 2012.  Notary Public
My Commission expires: <u>\$-03-13</u> .	SHONDA D. SMITH Notary Public - State of Kansas My Appt. Expires August 3, 2013

## **CERTIFICATE OF SERVICE**

#### 12-KGSG-835-RTS

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 22nd day of May, 2012, to the following:

PATRICE PETERSEN-KLEIN
EXECUTIVE DIRECTOR
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
\*\*Hand Delivered\*\*

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> Shonda Smith Office Manager