

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

DEC 16 2011

by
State Corporation Commission
of Kansas

In the Matter of the Application of Howison Heights, Inc., for Approval of Certain Changes in its Charges for Water Service.)
) Docket No. 12-HHIW-382-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 November 30, 2011, Howison Heights, Inc. filed an application with the Kansas Corporation Commission for Approval of Certain Changes in its Charges for Water Service.
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
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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
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CERTIFICATE OF SERVICE

12-HHIW-382-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 16th day of December, 2011, to the following:

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

TIMOTHY B. HOWISON, PRESIDENT
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1212 MEYER DR
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MATTHEW SPURGIN, LITIGATION COUNSEL
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