

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS
STATE CORPORATION COMMISSION

FEB 04 2000

In the Matter of the Application of Kansas Gas)
Service Company, a Division of ONEOK, Inc.)
for Commission Determination for the Rate)
Treatment of Discounted Service Agreements)
Entered Into to Meet Competitive Alternatives.)

Adrian L. Wegman Docket Room
Docket No. 00-KGSG-420-RTS

PETITION FOR RECONSIDERATION

COMES now the Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission”, respectively), and files this Petition for Reconsideration pursuant to K.S.A. 66-118b, K.S.A. 77-529, and K.A.R. 82-1-235. In support of its Petition, Staff hereby states as follows:

1. On January 27, 2000, the Commission issued its Order No. 3: Order Making This Docket a General Investigation, Assessing Costs, and Establishing a Procedural Schedule. While Staff generally supports the Commission’s decisions in Order No. 3, Staff believes that the Commission should consider other means for a more effective resolution to this docket, and therefore requests that its Petition for Reconsideration be granted for the purposes of altering the procedural schedule.

2. Staff notes that the current procedural schedule asks for initial comments on February 25, 2000, responsive comments on March 14, 2000, and a hearing for oral arguments on March 30, 2000. Staff suggests that an alternative expanded procedural schedule allowing the parties more time to address specific topics concerning revenue imputation of discounted service agreements would result in a more complete record for a Commission determination.

3. With the current form of the procedural schedule and requested comments, Staff is concerned that the Commission may not have sufficient information to reach a general policy determination of an appropriate amount of revenue imputation for discounted service agreements, if the Commission decides to impute revenues at all. Staff urges that the Commission’s intent can best

be served by forming specific questions and hypothetical situations as topics for comment. Staff believes that such guidance would allow the parties to file more pointed comments with respect to specific issues regarding revenue imputation of discounted service agreements, resulting in a more focused and productive investigation. With more specific comments from the parties, the Commission could build a more complete record and make a more definitive determination of the issues. Staff suggests that it can formulate and file appropriate suggested topics for a more centered and supported discussion by mid-March, 2000. The Commission could adopt or modify Staff's suggestions as needed. Subsequently, the Commission's procedural schedule can be resumed, with possible deadlines for comments in late April, 2000, and responsive comments in mid-to-late May, 2000.

WHEREFORE, for the reasons set forth above, Staff requests that its Petition for Reconsideration be granted, and that the Commission adopt a revised procedural schedule.

Respectfully Submitted,

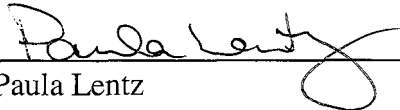


Paula Lentz, #18546
Assistant General Counsel
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604-4027
785-271-3279
Attorney for the Commission Staff

VERIFICATION

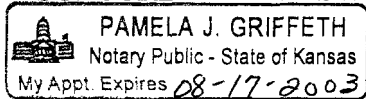
STATE OF KANSAS)
) s s :
COUNTY OF SHAWNEE)

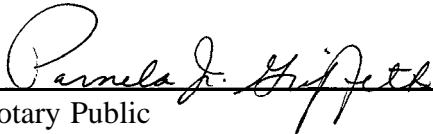
Paula Lentz, being duly sworn upon her oath, deposes and states that she is one of the attorneys of the Kansas Corporation Commission; that she has read and is familiar with the foregoing Petition for Reconsideration filed herewith; and that the statements made herein are true to the best of her knowledge, information and belief.



Paula Lentz

SUBSCRIBED AND SWORN to before me this 4th day of February, 2000.





Notary Public

My Appointment Expires:

CERTIFICATE OF SERVICE

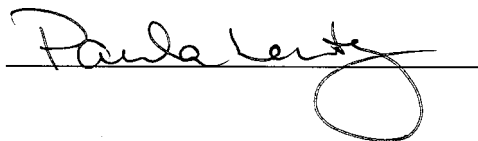
(OO-KGSG-420-GIG)

I, the undersigned, hereby certify that a true and correct copy of the foregoing *Petition For Reconsideration* was placed in the United States mail, postage prepaid, on this 4th day of February, 2000, addressed to the following and attached service list.

John P. Decoursey
Larry M. Cowger
Kansas Gas Service Company
A Division of ONEOK, Inc.
7421 W. 129th Street
Overland Park, KS 662 13

Larry G. Willer
Director of Rates and Regulations
Kansas Gas Service Company
A Division of ONEOK, Inc.
7421 W. 129th Street
Overland Park, KS 66213

Walker Hendrix
Allen Brady Cantrell
Citizens Utility Ratepayer Board
1500 S.W. Arrowhead Road
Topeka, KS 66604
*****Hand Delivered*****

A handwritten signature in black ink, appearing to read "Paula Lertz", is written over a horizontal line. The signature is cursive and includes a large, circular flourish at the end.

GAS COMPANIES
Updated 5-1 O-99

Jerry Smith
Anadarko Gathering Co.
P.O. Box 351
Liberal, KS 67905-0351

Ben H. Boyd, VP. Rates & Reg. Aff
Greeley Gas Co.
1301 Pennsylvania Street #800
Denver, CO 80203-5015

Kansas Gas Service
7421 West 129th Street
P.O. Box 25957
Shawnee Mission, KS 66225

Jason Austin, Regulatory Counsel
Kansas Gas Supply Corporation
1000 Louisiana #5800
Houston, TX 77002-5050

Roger A. Schulz, President
Mac County Gas, Inc.
Box 515
Canton, KS 67428

Barney Shiotani, President
Miami Pipe Line Company
3 1395 Old KC Road
Paola, KS 66071

John L. Sommer, President
MidContinent Market Center
100 W. 5th Street
Tulsa, OK 74103-4298

John L. Sommer, President
MidContinent Transportation, Inc.
100 W. 5th Street
Tulsa, OK 74103-4298

Gene Argo, President & Gen. Mgr.
Midwest Energy, Inc.
P.O. Box 898
Hays, KS 67601

Richard J. Haubensak, VP, Reg Affairs
Peoples Natural Gas
Division of UtiliCorp
1815 Capitol Ave.
Omaha, NE 68 102

Robert Shain, VP of Operations
Tekas Pipeline, LLC
1437 South Boulder #1250
Tulsa, OK 74119

MUNICIPAL GAS SYSTEMS
Updated 10-12-98

City Clerk
CITY OF ALMA
City Hall
Alma, KS 66401

City Clerk
CITY OF ALTA VISTA
City Hall-Main Street
Alta Vista, KS 66534

City Clerk
CITY AUBURN
P.O. Box 160
Auburn, KS 66402

City Clerk
CITY OF AURORA
Box 99
Aurora, KS 674 17

City Clerk
CITY OF BURLINGAME
City Hall - 101 East Santa Fe
Burlingame, KS 664 13

City Clerk
CITY OF ESKRIDGE
City Hall
P.O. Box 156
Eskridge, KS 66423

City Clerk
CITY OF GARDEN PLAIN
P.O. Box 246
Garden Plain, KS 67050

Gas Superintendent
CITY OF HARVEYVILLE
City Hall
Harveyville, KS 6643 1

City Clerk
CITY OF JAMESTOWN
P.O. Box 274
Jamestown, KS 66948

City Clerk
CITY OF LaCYGNE
City Hall - P.O. Box 600
LaCygne, KS 66040

City Clerk
CITY OF LONGFORD
City Hall
P.O. Box 265
Longford, KS 67458

City Clerk
CITY OF MILFORD
City Hall - P.O. Box 0
Milford, KS 665 14

City Clerk
CITY OF MORLAND
City Hall - P.O. Box 146
Morland, KS 67650

City Clerk
CITY OF PALMER
City Hall
Palmer, KS 66962

City Clerk
CITY OF PAWNEE ROCK
City Hall - P.O. Box 218
Pawnee Rock, KS 67567

Eleanor Strecker, City Clerk
CITY OF SPEARVILLE
City Hall
Spearville, KS 67876

City Clerk
CITY OF UNIONTOWN
City Hall - P.O. Box 51
Uniontown, KS 66779