

STATE CORPORATION COMMISSION
NOV 20 10 40 AM '99

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

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

DEC 02 1999

Arthy S. Wilson Docket Room

In the Matter of the Application of Kansas)
Gas Service Company, a Division of) Docket No.
ONEOK, Inc. for Commission) OO-KGSG-420-RTS
Determination of the Rate Treatment of)
Discounted Service Agreements Entered)
Into to Meet Competitive Alternatives.)

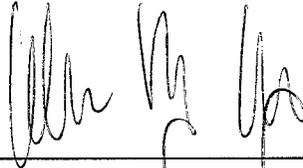
PETITION FOR LEAVE TO INTERVENE

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 19, 1999, Kansas Gas Service (KGS) filed an application for Commission Determination of the Rate Treatment of Discounted Service Agreements Entered Into to Meet Competitive Alternatives. Kansas Gas Service has requested the Commission issue an Order providing that there will be no imputation of revenue in the course of a rate case filed by KGS associated with such Discounted Service Agreements.
3. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas Gas Service. 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:

CURB moves the Commission for an order allowing it to intervene in this proceeding and to become a party of record with all rights to have notice of and participate in hearings, to present evidence, to cross-examine witnesses, to file briefs and participate in argument, and for all other necessary and proper purposes.



Walker Hendrix #08835
Allen Brady Cantrell #1772 1
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604

CERTIFICATE OF SERVICE

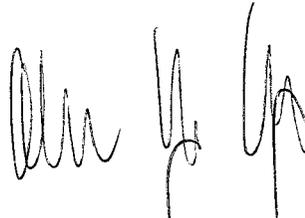
I, Allen Brady Cantrell, hereby certify a true and correct copy of the foregoing Intervention, was placed in the United States mail, postage pre-paid on this 2nd day of December, 1999 to all parties on the Commission's Official Mailing list.

Glenda Cafer
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604

John DeCoursey
Kansas Gas Service Company
P.O. Box 25957
Shawnee Mission, KS 66225

Larry Cowger
Kansas Gas Service Company
P.O. Box 25957
Shawnee Mission, KS 66225

Larry G. Willer
Director of Rates and Regulations
Kansas Gas Service Co.
A Division of ONEOK, Inc.
7421 W. 129th St.
Overland Park, KS 662 13



Allen Brady Cantrell