

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

JAN 30 2012

by
State Corporation Commission
of Kansas

In the Matter of the Application of)
Atmos Energy for Adjustment of Its) Docket No. 12-ATMG-564-RTS
Natural Gas Rates in the State of Kansas)

PETITION TO INTERVENE AND MOTION FOR PROTECTIVE ORDER

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 and motion, 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 January 26, 2012, Atmos Energy filed an application with the Commission for Adjustment 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
Email: sd.smith@curb.kansas.gov

Della Smith
Administrative Specialist
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
Email: d.smith@curb.kansas.gov

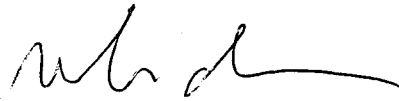
6. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

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.

8. In the filing, portions of the application was filed as confidential information. CURB is requesting the Commission issue a Protective Order in this docket to allow CURB and its consultant access to the full information contained in this filing.

WHEREFORE, CURB RESPECTFULLY REQUESTS THE Commission grant its Petition for Intervention and request for a Protective Order 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

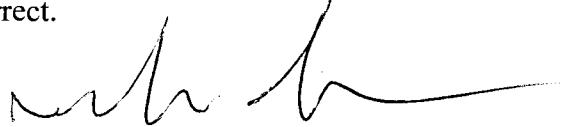
VERIFICATION

STATE OF KANSAS)

COUNTY OF SHAWNEE) ss:

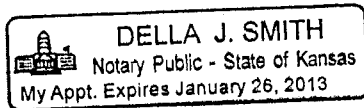
I, Niki Christopher, of lawful age, being first duly sworn upon her oath states:

That she is an attorney for the Citizens' Utility Ratepayer Board, that she has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.



Niki Christopher

SUBSCRIBED AND SWORN to before me this 30th day of January, 2012.



Notary Public

My Commission expires: 01-26-2013.

CERTIFICATE OF SERVICE

12-ATMG-564-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, electronic service, or hand-delivered this 30th day of January, 2012, to the following:

Patti Petersen-Klein
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
Hand Delivered

Matthew Spurgin, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
Hand Delivered

Holly Fisher, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
Hand Delivered

James G. Flaherty, Attorney
Anderson & Byrd, LLP
216 S. Hickory, P.O. Box 17
Ottawa, KS 66067
jflaherty@andersonbyrd.com

Douglas C. Walther, Associate General Counsel
Atmos Energy
P. O. Box 650205
Dallas, Texas 75265-0205
Douglas.Walther@AtmosEnergy.com

James Price, Attorney
Atmos Energy
P. O. Box 650205
Dallas, Texas 75265-0205
James.Price@AtmosEnergy.com

CERTIFICATE OF SERVICE

12-ATMG-564-RTS

Karen P. Wilkes
Division Vice President, Regulatory and Public Affairs
Atmos Energy
1555 Blake Street, Suite 400
Denver, Colorado 80202
Karen.Wilkes@AtmosEnergy.com

Barton W. Armstrong
Vice President, Operations
Atmos Energy
25090 W. 110th Terr.
Olathe, KS 66061
Bart.Armstrong@AtmosEnergy.com



Della Smith
Administrative Specialist