



10:20 AM MAY 27 2020 EXEC SEC DIV

CONSUMER ADVOCATE DIVISION  
STATE OF WEST VIRGINIA  
Suite 810  
300 Capitol Street  
Charleston, West Virginia 25301  
(304) 558-0526

May 27, 2020

Connie Graley  
Executive Secretary  
Public Service Commission of West Virginia  
201 Brooks Street  
Charleston, West Virginia 25301

RE: Frontier Communications Corporation; Frontier West Virginia  
Inc.; Citizens Telecommunications Company of West Virginia  
d/b/a Frontier Communications of West Virginia; Frontier  
Communications of America, Inc/ d/b/a Frontier Long Distance;  
And Frontier Communications Online and Long Distance Inc. d/b/a  
Frontier Communications of America West Virginia

Joint Petition for Expedited Approval of  
Certain Chapter 11-related Reorganization Changes

Case No. 20-0400-T-PC

Dear Ms. Graley:

Enclosed for filing in the above-styled and numbered case, please find the original and twelve (12) copies of *The Consumer Advocate Division's Petition to Intervene* in the above matter. Copies have been served on all parties of record per protective agreement.

Very truly yours,

Tom White  
Bar No. 6393

cc: Parties of record

PUBLIC SERVICE COMMISSION  
OF WEST VIRGINIA  
CHARLESTON

RE: Frontier Communications Corporation; Frontier West Virginia Inc.; Citizens Telecommunications Company of West Virginia d/b/a Frontier Communications of West Virginia; Frontier Communications of America, Inc/ d/b/a Frontier Long Distance; And Frontier Communications Online and Long Distance Inc. d/b/a Frontier Communications of America West Virginia

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**CONSUMER ADVOCATE DIVISION'S PETITION TO INTERVENE**

1. Pursuant to Rule 12.6 of the Commission's Rules of Practice and Procedure and *West Virginia Code* § 24-1-1(f) (2), the Consumer Advocate Division of the Public Service Commission of West Virginia (CAD) hereby petitions to intervene in the above-styled and numbered case on behalf of the residential consumers of Frontier West Virginia and Frontier Communications (Frontier).

2. The name and address of the CAD's attorney is:

Tom White  
Consumer Advocate Division  
Public Service Commission of West Virginia  
7th Floor, Union Building  
723 Kanawha Boulevard, East  
Charleston, West Virginia 25301  
[twhite@cad.state.wv.us](mailto:twhite@cad.state.wv.us)

3. Frontier is a public utility engaged in the business of providing telephone service in its prescribed and designated service areas in the State of West Virginia and, as such, is subject to Chapter 24 of the Code of West Virginia of 1931, as amended, and the provisions thereof applicable to said class of public utilities.

4. The CAD is required by statute and rule to represent the interests of residential

ratepayers in major rate proceedings and other related proceedings.

5. The above cited case constitutes a proceeding with potential for adverse effects on Frontier's ratepayers in West Virginia.

WHEREFORE, the Consumer Advocate Division of the Public Service Commission of West Virginia respectfully requests that its Petition to Intervene in this proceeding be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tom White', is written above a horizontal line.

Tom White  
Counsel for Consumer Advocate  
State Bar No. 6393

PUBLIC SERVICE COMMISSION  
OF WEST VIRGINIA  
CHARLESTON

RE: Frontier Communications Corporation; Frontier West Virginia Inc.; Citizens Telecommunications Company of West Virginia d/b/a Frontier Communications of West Virginia; Frontier Communications of America, Inc/ d/b/a Frontier Long Distance; And Frontier Communications Online and Long Distance Inc. d/b/a Frontier Communications of America West Virginia

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**CERTIFICATE OF SERVICE**

I, Tom White, counsel for the Consumer Advocate Division of the Public Service Commission of West Virginia, (CAD), hereby certify that I have served a copy of the foregoing *Consumer Advocate Division's (CAD) Petition to Intervene* by First Class, U.S. Mail, postage pre-paid.



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Tom White  
Counsel for Consumer Advocate  
State Bar No. 6393

Dated: May 27, 2020