

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

APR 11 2008

 Docket Room

In the Matter of the Application of)
ITC Great Plains, LLC to Amend its)
Certificate of Public Convenience and Authority)
To Transact the Business of an Electric Public)
Utility in the State of Kansas.)

Docket No.:
08-ITCE-936-COC

APPLICATION TO AMEND CERTIFICATE OF PUBLIC CONVENIENCE
(Ford, Kiowa, Clark and Comanche Counties)

ITC Great Plains, LLC (“ITC Great Plains”), by its undersigned counsel, hereby applies pursuant to K.S.A. 66-131 for an amendment to its Certificate of Public Convenience and Authority (“Certificate”) to construct, own, operate and manage wholesale electrical transmission facilities in portions of the Counties of Ford, Kiowa, Clark and Comanche in the State of Kansas.

In support of this application, ITC Great Plains states as follows:

1. ITC Great Plains is a public utility under the provisions of K.S.A. Section 66-104, pursuant to the Commission’s Order Approving Stipulation & Agreement and Addressing Application of Statutes, In re Application of ITC Great Plains, LLC for a Limited Certificate of Public Convenience to Transact the Business of an Electric Public Utility in the State of Kansas, No. 07-ITCE-380-COC (Kans. Corp. Comm’n, June 5, 2007).

2. In approving the Stipulation and Agreement (“Stipulation”), the Commission granted ITC Great Plains’ request for a certificate of convenience and authority for the limited purpose of building and operating Southwest Power Pool, Inc. (“SPP”) Transmission Projects in the state, subject to the conditions contained in the Stipulation. SPP is the relevant regional transmission organization (“RTO”) for planning transmission expansion projects in Kansas, as

recognized by both this Commission and the Federal Energy Regulatory Commission. See Order Adopting Stipulation & Agreement and Granting Application, In re Application of Southwest Power Pool, Inc. for a Certificate of Convenience and Authority for the Limited Purpose of Managing and Coordinating the Use of Certain Transmission Facilities Located within the State of Kansas, No. 06-SPPE-202-COC (Kan. Corp. Comm'n, Sept. 19, 2006); Southwest Power Pool, Inc., 109 FERC ¶ 61,009 (2004).

3. On July 16, 2007, ITC Great Plains advised SPP that it intended to fund, construct, own and operate the Kansas portion or northern half of the transmission project commonly known as the X-Plan, which has been identified as an economic upgrade to the transmission systems of south central Kansas and north central Oklahoma. ITC Great Plains refers to the northern half or Kansas portion of the X-Plan as the V-Plan.

4. The V-Plan project calls for the installation of a transmission line commencing at the Spearville substation located northeast of Dodge City in Ford County, and running southeast through Kiowa, Clark, and Comanche Counties to a new ITC Great Plains switchyard to be located in either western Comanche County or eastern Clark County. The V-Plan also calls for a transmission line to be constructed from the new switchyard northeast through Clark, Comanche, and Barber Counties to another new ITC Great Plains substation to be located in the Medicine Lodge area. The final segment of the V-Plan calls for the transmission line to continue from the new Medicine Lodge substation through Barber, Harper, Kingman and Sumner Counties into Sedgwick County near Wichita. This Application does not request any Commission action related to the middle or final segments of the V-Plan.

5. This Application requests action by the Commission only on the initial segment of the V-Plan transmission line that would run from the Spearville substation in Ford County southeast through Kiowa, Clark, and Comanche Counties where ITC Great Plains will construct

a new switchyard. While this Application applies only to one segment of the V-Plan, ITC Great Plains intends to construct all three segments of the V-Plan, consistent with the terms of the Stipulation and the SPP Open Access Transmission Tariff (“OATT”). ITC Great Plains is also making companion filings today of two other applications to amend its certificate of public convenience for the other two segments of the V-Plan described above in Paragraph 4.

6. On September 26, 2007, SPP advised ITC Great Plains that SPP will include the X-Plan project (including the V-Plan portions) in the SPP planning process. See Exhibit A, Letter from SPP Senior Vice President Carl Monroe to ITC Great Plains President Carl Huslig (Sept. 26, 2007). The X-Plan has been identified as an economic project in the ongoing SPP Transmission Expansion Plan. On October 30, 2007, the SPP Board of Directors approved the inclusion of the X-Plan project in the ten-year SPP Transmission Expansion Plan as an economic project. See Exhibit B, Summary of Action Items at October 30, 2007 SPP Board of Directors meeting. These actions by the SPP mean that the elements of the X-Plan are Economic Upgrades under Section 1.10a of the SPP OATT, which means they “have potential economic benefit to the SPP Region, but are not required for reliability reasons.” Therefore, the inclusion of this project within the SPP transmission planning process as an economic project (not a reliability project) does not obligate any incumbent transmission owner with facilities that would interconnect with the X-Plan to construct any upgrade related to the X-Plan project.

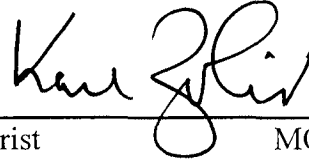
7. One of the conditions of the Stipulation approved by the Commission is that ITC Great Plains file an application to amend its Certificate and obtain authorization from the Commission to construct, own and/or operate specific SPP Transmission Projects. Under Paragraph 11 of the Stipulation, ITC Great Plains’ application to amend shall set forth the beginning and end points of the proposed transmission line and shall generally describe the proposed route, as indicated in paragraph 5 above.

8. This Stipulation also requires ITC Great Plains to provide a service copy of the application to each Affected Incumbent Transmission Owner. Sunflower Electric Power Corporation (“Sunflower”) is the only transmission owner that will be affected by ITC Great Plains’ decision to build the initial segment of the V-Plan between the Spearville substation and the new Comanche County switchyard, as described above. Sunflower is, therefore, the only Affected Incumbent Transmission Owner under the terms of the Stipulation. A copy of this Application with exhibits has been served upon Sunflower.

9. ITC Great Plains anticipates that Sunflower will support this application to amend ITC Great Plains’ Certificate and that Sunflower will advise the Commission that it does not intend to construct any segment of this project.

10. ITC Great Plains respectfully requests that the Commission grant expedited treatment to this Application so that ITC Great Plains may proceed with the design and construction of this project and avoid any undue delay in the completion and activation of the V-Plan.

WHEREFORE, ITC Great Plains, LLC respectfully requests that consideration of this Application be given expedited treatment and that the Commission grant the relief herein requested.



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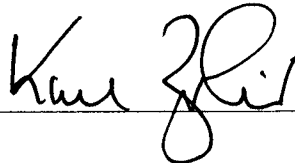
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Attorneys for Applicant ITC Great Plains, LLC

VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

Karl Zobrist, being of lawful age and duly sworn, states that he has caused the foregoing Application for Amendment of Certificate to be prepared, that he has read and reviewed the Application, and that the contents thereof are true and correct to the best of his knowledge and belief.



Karl Zobrist

Sworn to and subscribed before me this 10th day of April, 2008



Notary Public

My commission expires:



CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was served via U.S. Mail on this 10th day of April, 2008 as indicated to the following persons:

Jason T. Gray
Litigation Counsel
Kansas Corporation Commission
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Topeka, KS 66604

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Attorney for ITC Great Plains, LLC

Exhibit A



415 N. McKinley, Suite 140
Little Rock, AR 72205-3020
501/614-3200 * Fax: 501/664-9553

September 26, 2007

Mr. Carl A. Huslig
President
ITC Great Plains
1100 SW Wanamaker Road, Suite 103
Topeka, Kansas 66604

RE: Your letter to SPP dated July 16, 2007
Proposed Spearville – Comanche – Wichita 345 kV transmission line

Dear Mr. Huslig:

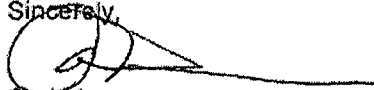
In response to your July 16, 2007 letter, SPP will include the Project described in your letter in the Southwest Power Pool Planning process. SPP will be asking its Board of Directors in the October meeting to include the Project in the 2007 SPP Transmission Expansion Plan ("STEP") to be reviewed, approved and ultimately implemented pursuant to SPP's governing documents and processes and all applicable laws and regulations. SPP acknowledges ITC Great Plains' willingness to fund, construct, own and operate the Project as set forth in your letter.

As described in your letter, SPP now envisions the Project to consist of the addition of a 345 kV transmission line designed at either a 345 kV or 765 kV standard comprising what we call the Northern half of the X-Plan in Kansas, the Spearville to Comanche County to Wichita line. SPP appreciates this further evidence of ITC Great Plains' willingness to work with SPP to develop this major transmission project. With regard to cost allocation for this Project, the specific assignment of reliability or economic designations and any associated crediting will be determined at the appropriate time and in conformance with SPP procedures.

In response to your July 16th letter, SPP conducted impact assessment studies with designs at both 345 kV and 765 kV and found that this Project had no impacts or affect on projects in the pending and proposed 2007 STEP. SPP would anticipate coordinating efforts to address the preliminary design, location, voltage, etc., of transmission lines and facilities necessary to provide a continuous path to the desired destinations in a timely manner.

If you have questions or need information, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'Carl Monroe', with a long horizontal stroke extending to the right.

Carl Monroe
Sr. Vice President and
Chief Operating Officer

cc: Leslie E. Dillahunty
Vice President, Regulatory Policy



Exhibit B

Southwest Power Pool
BOARD OF DIRECTORS/MEMBERS COMMITTEE MEETING
Doubletree Hotel at Warren Place – Tulsa, OK
October 30, 2007

- Summary of Action Items -

1. Approved minutes of the July 24 and October 1, 2007 Board of Directors/Members Committee meetings as amended.
2. Adopted resolutions commending Ms. Sandy Hochstetter (APSC) and Mr. Steve Gaw (MPSC) for their past contributions to the SPP Regional State Committee.
3. Approved Consent Agenda items:
 - The MOPC recommendation to approve the revised version of SPP Criteria 7.4.7.
 - The MOPC recommendation to approve the addition to Criteria 12.3 it proposes.
 - The MOPC recommendation to approve changes to Criteria 12.1.
 - The MOPC recommendation to approve the Change Working Group (one of the five Working Groups presented in the new Organizational Chart) and to approve implementation of this group.
 - The Human Resources Committee recommendation to approve the SPP 401(k) plan to include the auto enrollment safe harbor provision and the change in matching contributions and vesting schedule.
 - The Finance Committee recommendation to approve engagement of BKD, LLC to audit and report on SPP's financial statements for the year ending December 31, 2007.
4. Approved the Finance Committee's recommendation to approve the 2008 SPP Operating and Capital Budgets as submitted.
5. Approved the Finance Committee's recommendation to establish an assessment rate and tariff administrative fee rate (schedule1A) of 19¢/MWh beginning on January 1, 2008.
6. Approved the Markets and Operations Policy Committee's recommendation to endorse the addition of the Spearville-Comanche Co-Wichita transmission project and the Spearville-Knoll-Axtell transmission project into the STEP as approved technically viable economic upgrades.