

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

Before Commissioners:

Mark Sievers, Chairman  
Thomas E. Wright  
Shari Feist Albrecht

Received  
on

**MAY 15 2013**

In the Matter of the Application of )  
ITC Great Plains, LLC and Mid-Kansas )  
Electric Company, LLC for a Siting )  
Permit for the Construction of a 345 )  
kV Transmission Line in Cloud and )  
Ottawa Counties, Kansas )

by  
State Corporation Commission  
of Kansas

Docket No. 13-ITCE-677-MIS

**PETITION TO INTERVENE**

COMES NOW, the Southwest Power Pool, Inc. ("SPP") and pursuant to K.S.A. 77-521, petitions the State Corporation Commission of the State of Kansas ("the Commission") for an order granting SPP intervention in the above-captioned matter. In support of its Petition, SPP states the following:

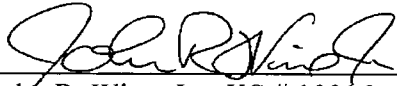
1. On May 3, 2013, ITC Great Plains, LLC ("ITC Great Plains") and Mid-Kansas Electric Company, LLC ("Mid-Kansas") submitted a *Joint Application for a Siting Permit for the Construction of a 345 kV Transmission Line in Cloud and Ottawa Counties, Kansas ("Application for Siting Permit")*, requesting the right to construct a 345 kV transmission line from ITC Great Plains' Elm Creek Substation south to Westar Energy, Inc.'s Summit Substation (the "Project").
2. SPP, as a FERC-approved Regional Transmission Organization ("RTO"), is responsible for taking all reasonable steps, including planning and general oversight duties, necessary

to maintain and enhance the reliability of the electric transmission network operated by its member companies in Kansas and in other states in the SPP RTO Region.

3. A group of transmission upgrade projects in the SPP footprint, including the Project, was approved by the SPP Board of Directors as part of the 2012 Integrated Transmission Planning 10-Year (“ITP10”) Assessment on January 31, 2012. The Project was identified to address voltage collapse at Elm Creek related to the loss of the Elm Creek – Northwest Manhattan 230 kV Line.
4. SPP was responsible for conducting the ITP10 Assessment related to the Project, and as the RTO is responsible for regional planning and reliability of the electric transmission network. Accordingly, SPP intends to file testimony based on the studies demonstrating the need for and the benefit of the Project.
5. SPP's interests would, thus, be substantially affected by the outcome of this proceeding, and the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing intervention.
6. Accordingly, SPP has an essential interest in the outcome of this proceeding which cannot be adequately represented by any other party.

**WHEREFORE**, SPP respectfully requests the Commission grant its Petition to Intervene in this matter.

Respectfully submitted,



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and


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**Attorneys for Southwest Power Pool, Inc.  
Petitioner**

**VERIFICATION  
K.S.A. 53-601**

STATE OF KANSAS        )  
                                  ) ss:  
COUNTY OF SHAWNEE    )

I verify under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
John R. Wine, Jr.

Executed on May 15, 2013.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above Petition to Intervene was sent via email, this 15th day of May, 2013, to the following:

<p>Samuel Feather, Litigation Counsel          Kansas Corporation Commission          1500 SW Arrowhead Rd          Topeka, KS 66604-4027          Fax: 785-271-3167  <a href="mailto:s.feather@kcc.ks.gov">s.feather@kcc.ks.gov</a></p>	<p>Brian G. Fedotin, Advisory Counsel          Kansas Corporation Commission          1500 SW Arrowhead Rd          Topeka, KS 66604-4027          Fax: 785-271-3314  <a href="mailto:b.fedotin@kcc.ks.gov">b.fedotin@kcc.ks.gov</a></p>
<p>Judy Jenkins, Litigation Counsel          Kansas Corporation Commission          1500 SW Arrowhead Rd          Topeka, KS 66604-4027          Fax: 785-271-3167  <a href="mailto:j.jenkins@kcc.ks.gov">j.jenkins@kcc.ks.gov</a></p>	<p>Susan B. Cunningham, Counsel          Dentons US LLP          7028 SW 69<sup>th</sup> St          Auburn, KS 66402-9421          Fax: 816-531-7545  <a href="mailto:Susan.Cunningham@dentons.com">Susan.Cunningham@dentons.com</a></p>
<p>Karl Zobrist, Partner          Dentons US LLP          4520 Main Street Ste 1100          Kansas City, MO 64111-7700          Fax: 816-531-7545  <a href="mailto:Karl.Zobrist@dentons.com">Karl.Zobrist@dentons.com</a></p>	<p>Charles Marshall, Sr. Reg. Analyst          ITC Great Plains, LLC          27175 Energy Way          Novi, MI 48377  <a href="mailto:cmarshall@itctransco.com">cmarshall@itctransco.com</a></p>
<p>Alan K. Myers, Vice President-Technical          ITC Great Plains, LLC          3500 SW Fairlawn Rd Ste 101          Topeka, KS 66614-3979  <a href="mailto:amyers@itctransco.com">amyers@itctransco.com</a></p>	<p>Kristine M. Schmidt, President          ITC Great Plains, LLC          3500 SW Fairlawn Rd Ste 101          Topeka, KS 66614-3979  <a href="mailto:kschmidt@itctransco.com">kschmidt@itctransco.com</a></p>
<p>Matthew S. Carstens, Sr. Counsel-Cap.          Projects &amp; Maintenance          ITC Holdings Corp.          123 5<sup>th</sup> Street SE          Cedar Rapids, IA 52401  <a href="mailto:mcarstens@itctransco.com">mcarstens@itctransco.com</a></p>	<p>Don Gulley, VP Regulatory &amp; Market Affairs          Mid-Kansas Electric Company, LLC          301 W 13<sup>th</sup> St          PO Box 980          Hays, KS 67601          Fax: 785-623-3395  <a href="mailto:dgulley@sunflower.net">dgulley@sunflower.net</a></p>
<p>Lindsay Shepard, Executive Manager          Corporation Compliance          Mid-Kansas Electric Company, LLC          301 W 13<sup>th</sup> St          PO Box 980          Hays, KS 67601          Fax: 785-623-3395  <a href="mailto:lshepard@sunflower.net">lshepard@sunflower.net</a></p>	<p>Noman L. Williams, Vice Pres., Transmission          Policy          Mid-Kansas Electric Company, LLC          301 W 13<sup>th</sup> St          PO Box 1020          Hays, KS 67601          Fax: 785-623-3395  <a href="mailto:nwilliams@sunflower.net">nwilliams@sunflower.net</a></p>

<p>Mark D. Calcara, Attorney  Watkins Calcara Chtd.  1321 Main St Ste 300  PO Drawer 1110  Great Bend, KS 67530  Fax: 620-792-2775  <a href="mailto:mcalcara@wcrf.com">mcalcara@wcrf.com</a></p>	<p>Niki Christopher, Attorney  Citizens' Utility Ratepayer Board  1500 SW Arrowhead Rd  Topeka, KS 66604  <a href="mailto:n.christopher@curb.kansas.gov">n.christopher@curb.kansas.gov</a></p>
<p>C. Steven Rarrick, Attorney  Citizens' Utility Ratepayer Board  1500 SW Arrowhead Rd  Topeka, KS 66604  <a href="mailto:s.rarrick@curb.kansas.gov">s.rarrick@curb.kansas.gov</a></p>	<p>Della Smith  Citizens' Utility Ratepayer Board  1500 SW Arrowhead Rd  Topeka, KS 66604  <a href="mailto:d.smith@curb.kansas.gov">d.smith@curb.kansas.gov</a></p>
<p>Shonda Smith  Citizens' Utility Ratepayer Board  1500 SW Arrowhead Rd  Topeka, KS 66604  <a href="mailto:sd.smith@curb.kansas.gov">sd.smith@curb.kansas.gov</a></p>	<p>David Springe, Consumer Counsel  Citizens' Utility Ratepayer Board  1500 SW Arrowhead Rd  Topeka, KS 66604  <a href="mailto:d.springe@curb.kansas.gov">d.springe@curb.kansas.gov</a></p>




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John R. Wine, Jr.  
Attorney for Southwest Power Pool, Inc.



HELPING OUR MEMBERS WORK TOGETHER  
TO KEEP THE LIGHTS ON... TODAY AND IN THE FUTURE

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May 15, 2013

Docket Room  
Patti Petersen-Klein, Executive Director  
Kansas Corporation Commission  
1500 SW Arrowhead Rd  
Topeka, KS 66604-4027



**MAY 15 2013**

by  
State Corporation Commission  
of Kansas

RE: Docket No. 13-ITCE-677-MIS

Dear Ms. Petersen-Klein:

Please find an original and seven copies of Southwest Power Pool's Petition to Intervene. This filing was fax filed on May 15, 2013. Please file-mark one copy and send back to me in the enclosed pre-paid Federal Express Envelope.

Thank you for your assistance!

Sincerely,

A handwritten signature in cursive script that reads 'Michelle Harris'.

Michelle Harris

Enclosures