

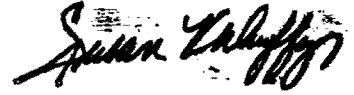
STATE CORPORATION COMMISSION

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

APR 20 2011

In the Matter of the Application of)
Grain Belt Express Clean Line, LLC for a)
Limited Certificate of Public Convenience to)
Transact the Business of a Public Utility in the)
State of Kansas)

Docket No. 11-GBEE-624-COC



PETITION TO INTERVENE

COMES NOW Mid-Kansas Electric Company, LLC (Mid-Kansas), and moves the Commission to issue an Order allowing Mid-Kansas to intervene in this proceeding.

In support of its petition, Mid-Kansas states:

1. On March 7, 2011, Grain Belt Express Clean Line, LLC (Clean Line) filed its application for a limited certificate of public convenience and necessity to site, construct, own, operate and maintain bulk electric transmission facilities located in the state of Kansas. Specifically, Clean Line seeks a certificate of convenience for "Transmission Rights Only" to construct and operate the Grain Belt Express Clean Line project, a high voltage direct current (HVDC) transmission line for the delivery of energy from renewable resources in Kansas to load centers in the east. Application at 1.

2. Mid-Kansas currently owns, operates and maintains transmission, and provides and uses transmission service in the State of Kansas and desires to continue providing such services through upgrades to its existing facilities and the construction of new facilities to service load requirements, reduce congestion, facilitate the economical purchase and sale of electric power and energy, and to help facilitate competitive electric markets in Kansas and the Southwest Power Pool region.

3. A portion of Clean Line's proposed HVDC transmission facilities will traverse the existing certified service territory of Mid-Kansas, and the operation of such

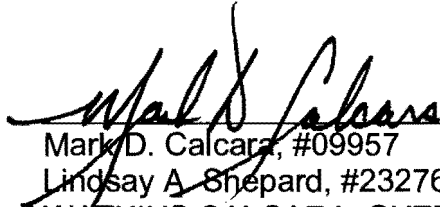
facilities will have a direct impact on the operations of Mid-Kansas due to their anticipated interconnection with the electric transmission system in the Spearville, Kansas area.

4. The interest of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing this intervention.

5. For the above reasons, Mid-Kansas requests that the Commission grant its request and allow Mid-Kansas to fully participate in this matter.

WHEREFORE, Mid-Kansas requests that the Commission issue its Order granting Mid-Kansas' petition to intervene in this matter and for such other and further relief as may be appropriate.

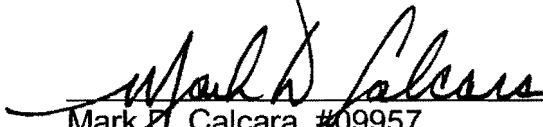
Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Mark D. Calcara", is written over a horizontal line.

Mark D. Calcara, #09957
Lindsay A. Shepard, #23276
WATKINS CALCARA, CHTD.
1321 Main Street, Suite 300
P.O. Drawer 1110
Great Bend, KS 67530
Telephone: (620) 792-8231
Facsimile: (620) 792-2775
Attorneys for Mid-Kansas Electric Company, LLC

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 20th day of April, 2011, the above and foregoing *Petition to Intervene* was submitted to Susan K. Duffy, Executive Director, Kansas Corporation Commission via facsimile, with the original and eight copies mailed via UPS to the Commission, and electronic mail to the following parties who have waived receipt of follow-up hard copies:


Mark D. Calcara, #09957
Lindsay A. Shepard, #23276

GLEENDA CAFER, ATTORNEY
CAFER LAW OFFICE, L.L.C.
3321 SW 6TH STREET
TOPEKA, KS 66606
gcafer@sbcglobal.net

DAVID SPRINGE, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
d.springe@curb.kansas.gov

TERRI PEMBERTON, ATTORNEY
CAFER LAW OFFICE, L.L.C.
3321 SW 6TH STREET
TOPEKA, KS 66606
tjemberton@sbcglobal.net

MARK LAWLOR
GRAIN BELT EXPRESS CLEAN LINE LLC
16332 NIEMAN RD
OVERLAND PARK, KS 66062-9721
mlawlor@cleanlineenergy.com

NIKI CHRISTOPHER, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
n.christopher@curb.kansas.gov

KATHRYN L. PATTON, VICE PRESIDENT
AND GENERAL COUNSEL
GRAIN BELT EXPRESS CLEAN LINE LLC
1001 MCKINNEY ST STE 700
HOUSTON, TX 77002-6448
kpatton@cleanlineenergy.com

C. STEVEN RARRICK, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
s.rarrick@curb.kansas.gov

CARL A. HUSLIG, PRESIDENT
ITC GREAT PLAINS, LLC
1100 SW WANAMAKER ROAD, SUITE 103
TOPEKA, KS 66604
chuslig@itctransco.com

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

BRETT D. LEOPOLD, SENIOR
ATTORNEY
ITC GREAT PLAINS, LLC
1100 SW WANAMAKER ROAD, SUITE 103
TOPEKA, KS 66604
bleopold@itctransco.com

SHONDA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604
sd.smith@curb.kansas.gov

ALAN K. MYERS, VICE PRESIDENT-TECHNICAL
ITC GREAT PLAINS, LLC
1100 SW WANAMAKER ROAD, SUITE 103
TOPEKA, KS 66604
amyers@itctransco.com

BRIAN THUMM, MANAGER, REG. STRATEGY
ITC HOLDINGS CORP
27175 ENERGY WAY
NOVI, MI 48377-3639
bthumm@itctransco.com

DANA BRADBURY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
d.bradbury@kcc.ks.gov

PATRICK T. SMITH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
p.smith@kcc.ks.gov

SUSAN B. CUNNINGHAM, COUNSEL
SNR DENTON US LLP
7028 SW 69TH ST
AUBURN, KS 66402-9421
susan.cunningham@snrdenton.com

MARTIN J. BREGMAN, EXEC DIR, LAW
WESTAR ENERGY, INC.
818 S KANSAS AVENUE
PO BOX 889
TOPEKA, KS 66601-0889
marty.bregman@westarenergy.com

CATHRYN J. DINGES, CORPORATE COUNSEL
WESTAR ENERGY, INC.
818 S KANSAS AVENUE
PO BOX 889
TOPEKA, KS 66601-0889
cathy.dinges@westarenergy.com