

Received
on

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

MAY 09 2013

by
State Corporation Commission
of Kansas

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.)
)
) Docket No. 13-ITCE-677-MIS
)
)
)

PETITION TO INTERVENE

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, 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 May 03, 2013, ITC Great Plains, LLC and Mid-Kansas Electric Company, LLC filed an application with the Kansas Corporation Commission for a siting permit for the construction of a 345 kV transmission line in Cloud and Ottawa Counties, Kansas.

4. CURB is requesting permission to intervene in this docket to represent the interests of the residential and small commercial ratepayers of Kansas who will pay for and be served by the proposed line. The rates paid and the service received by those customers will or may be affected by any Commission order or activity in this proceeding to deny, alter or approve the final route of the

proposed transmission line. Additionally, in prior transmission siting dockets, CURB has received a large number of phone calls, emails and other inquiries from members of the public seeking information, advice and assistance concerning the proposed transmission projects. CURB's participation in these dockets provides members of CURB's staff with the information and expertise necessary to accurately address these inquiries and to assist them in contacting the appropriate officials or company personnel. Further, intervention in siting dockets allows CURB to assess the costs of the time its staff spends answering public inquiries to the appropriate docket. Finally, its participation in the public hearings affords CURB the opportunity to educate the public about its role in representing the interests of customers, not the landowners, in these proceedings, which helps eliminate confusion about why CURB rarely takes a position in support of alternate routes suggested by landowners.

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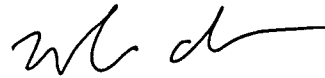
6. The representation of CURB's interests in this proceeding by existing parties is or may be inadequate.

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.

WHEREFORE, CURB RESPECTFULLY REQUESTS THE Commission grant its Petition for Intervention in this Docket.

Respectfully submitted,



David Springe #15619
Niki Christopher #19311
C. Steven Rarrick #13127
Citizens' Utility Ratepayer Board
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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

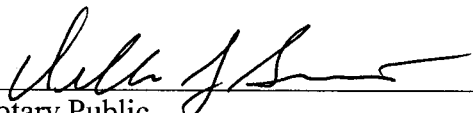
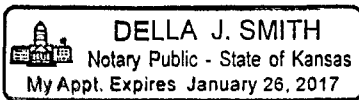
I, Niki Christopher, of lawful age, being first duly sworn upon her oath states:

That she is an attorney for the above named petitioner; that she has read the above and foregoing Intervention, and, upon information and belief, states that the matters therein appearing are true and correct.



Niki Christopher

SUBSCRIBED AND SWORN to before me this 9th day of May, 2013.



Notary Public

My Commission expires: 01-26-2017.

CERTIFICATE OF SERVICE

13-ITCE-677-MIS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 9th day of May, 2013, to the following:

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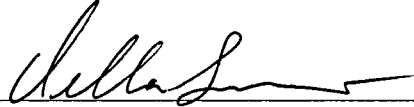
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