

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

JUN 06 2008

Susan Talbot Docket Room

In the Matter of the Application of Prairie Wind)
Transmission, LLC for a Certificate of Public)
Convenience to Transact the Business of an) Docket No. 08-PWTE-1022-COC
Electric Public Utility in Ford, Kiowa, Clark,)
Comanche, Barber, Pratt, Harper, Kingman,)
Sumner and Sedgwick Counties, Kansas.)

PETITION TO INTERVENE

COMES NOW, ITC Great Plains, LLC (ITC Great Plains), and pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 petitions the State Corporation Commission of the State of Kansas (Commission) for an order granting ITC Great Plains intervention in the above-captioned matter. In support of its Petition, ITC Great Plains states as follows:

1. On May 19, 2008, Prairie Wind Transmission, LLC (Prairie Wind) filed its application for a certificate of public convenience and authority to site, construct, own, operate and maintain bulk electric transmission facilities in Kansas. (Prairie Wind Application, p. 1.) Prairie Wind is jointly owned by Westar Energy, Inc. (Westar) and Electric Transmission America, LLC (ETA). (*Id.*) Prairie Wind intends to construct a new 765 kV line in two segments: (1) from an existing Westar or its subsidiary, Kansas Gas and Electric Company, substation near Wichita, Kansas to a new 765 kV substation near Medicine Lodge, Kansas, and continuing to a new or existing substation near Spearville, Kansas; and (2) from a new 765 kV substation near Medicine Lodge to the Kansas-Oklahoma border. (*Id.* at p. 2.)

2. If a certificate of public convenience and authority is granted by the Commission, Prairie Wind intends to seek transmission siting authority and a limited “transmission only” certificate for the above-described transmission line. (*Id.* at p. 12.)

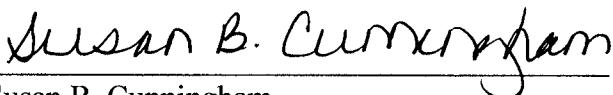
3. The Prairie Wind project as proposed in its application in this docket is similar to the SPP-approved V-Plan project. On April 11, 2008, ITC Great Plains filed three separate applications in Docket Nos. 08-ITCE-936-COC, 08-ITCE-937-COC and 08-ITCE-938-COC to amend its previously issued certificate of authority in order to construct, own, operate and maintain the three separate portions of the V-Plan. Those applications are now pending before the Commission. It is apparent that as regards the first ITC Great Plains application, Case 936, the western interconnection point for the project proposed by ITC Great Plains is the same as the western interconnection point proposed by Prairie Wind. Similarly, regarding the final ITC Great Plains application, Case 938, it is apparent that the eastern interconnection point proposed for that project is the same as the eastern interconnection point proposed by Prairie Wind in this docket. Given ITC Great Plains' previous efforts to work with the Southwest Power Pool process and effectuate the build out of high voltage lines (1) from the Spearville substation to the switchyard that ITC Great Plains intends to construct in Comanche County or Clark County, (2) from this new switchyard to a new substation that Mid-Kansas Electric Company and/or ITC Great Plains intends to construct in the Medicine Lodge area of Barber County and (3) from the Medicine Lodge substation to the Wichita substation, it is clear that ITC Great Plains' legal rights or interests may be substantially affected by this proceeding. K.A.R. 82-1-225(a)(2). Further, the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing ITC Great Plains to intervene. K.A.R. 82-1-225(a)(3). Finally, ITC Great Plains has an interest in the outcome of this proceeding which cannot be adequately represented by any other party.

4. For the above and foregoing reasons, ITC Great Plains should be permitted to intervene and represent its unique interests fully before the Commission in this proceeding.

VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

Susan B. Cunningham, being of lawful age and duly sworn, states that she has caused the foregoing Petition to Intervene to be prepared, that she has read and reviewed the Petition, and that the contents thereof are true and correct to the best of her knowledge and belief.



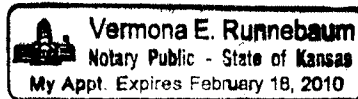
Susan B. Cunningham

Sworn to and subscribed before me this 6th day of June, 2008.



Notary Public

My commission expires:



CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was served via U.S. Mail or hand-delivered on this 6th day of June, 2008 as indicated to the following persons:

Dana Bradbury
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604

Steve Weiss
Senior Vice President & General Counsel
Mid American Energy Company
4299 NW Urbandale Drive
Urbandale, IA 50322

Patrick Smith
Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604

Kevin F. Duffy
Assistant General Counsel
American Electric Power Service Corp.
1 Riverside Plaza
Columbus, OH 43215

Michael Lennen
Vice President, Regulatory Affairs
Westar Energy, Inc.
P.O. Box 889
818 S. Kansas Avenue
Topeka, KS 66601

Martin J. Bregman
Cathryn J. Dinges
Westar Energy, Inc.
P.O. Box 889
818 Kansas Avenue
Topeka, KS 66601

Kelly B. Harrison
Vice President, Transmission
Operations and Environmental
Services
Westar Energy, Inc.
P.O. Box 889
818 S. Kansas Avenue
Topeka, KS 66601



Attorney for ITC Great Plains, LLC