

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

STATE CORPORATION COMMISSION

Before Commissioners:

Thomas E. Wright, Chairman  
Michael C. Moffet  
Joseph F. Harkins

APR 25 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

**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 October 13, 2006, ITC Great Plains, LLC (“ITC Great Plains”) submitted its *Application for Certificate of Convenience and Authority* requesting a limited certificate of convenience and authority to construct, own, operate and maintain bulk electric transmission functions in the State of Kansas. (Docket No. 07-ITCE-380-COC)
2. On June 5, 2007, the Commission issued its *Order Approving Stipulation and Agreement and Addressing Application of Statutes* in Docket No. 07-ITCE-380-COC, granting ITC Great Plains’ request for a certificate of convenience and authority for the limited purpose of building and operating SPP Transmission Projects in the State of Kansas, subject to the conditions contained in the Stipulation and Agreement.

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”. ITC Great Plains refers to the northern half or Kansas portion of the “X-Plan” as the “V-Plan”.
4. On April 11, 2008, ITC Great Plains submitted its *Application to Amend Certificate of Public Convenience* in Docket No. 08-ITCE-936-COC. ITC Great Plains seeks an amendment to its Certificate of Public Convenience and Authority 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.
5. In its Application, ITC Great Plains indicated that it is requesting Commission action “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.” (Para 5)
6. 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” or “Tariff”) and has submitted companion filings for the other two segments of the “V-Plan” in Docket Nos. 08-ITCE-937-COC and 08-ITCE-938-COC, respectively.
7. On September 19, 2006, the Commission issued its *Order Adopting Stipulation and Agreement and Granting Applications* in Docket Nos. 06-SPPE-202-COC and 06-WSEE-203-MIS, which gave the Commission jurisdiction over SPP pursuant to K.S.A. 66-101, 66-104, 66-131 and 66-136.
8. SPP, as a FERC-approved Regional Transmission Organization (“RTO”) and a regional Reliability Council, 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 adjacent states. 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.

9. 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 for Intervention in this matter.

Respectfully submitted,



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and

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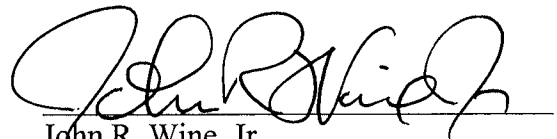
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**Attorneys for Southwest Power Pool, Inc.  
Petitioner**

**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.

  
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John R. Wine, Jr.

Executed on April 25, 2008.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above Petition to Intervene was placed in the United States mail, postage pre-paid, this 25 day of April, 2008, to the following:

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