BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

| Before Commissioners: | Jay Scott Emler, Chair Shari Feist Albrecht Pat Apple |
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| In the Matter of the Application of V Energy, Inc. for a Siting Permit for Construction of a 345 kV Transmission Line in Leavenworth County, Kansas | r the) |

PETITION TO INTERVENE

COMES NOW, 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 August 17, 2016, Westar Energy, Inc. ("Westar") submitted its *Application for a Siting Permit for the Construction of a 345 kV Transmission Line in Leavenworth, Kansas*("Application for Siting Permit"), requesting the right to construct a new 345 kV transmission line from Westar's Stranger Creek Substation to an interface with Kansas City Power & Light Company's transmission line, located north of Leavenworth, Kansas (the "Project").
- 2. SPP is a Regional Transmission Organization ("RTO") approved by the Federal Energy Regulatory Commission and 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.

- 3. The Project's need was determined by SPP's Integrated Transmission Plan ("ITP"), an iterative three-year study process that assesses long and near-term infrastructure needs of the SPP Transmission System. The intent of the ITP is to bring about continued development of a cost-effective, flexible, and robust transmission network that will provide efficient, reliable access to the region's diverse generating resources.
- 4. SPP was responsible for conducting the studies related to the ITP, which include the Project. 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 for Intervention in this matter.

Respectfully submitted,

John R. Wine, Jr. KS # 10016

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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 | | |
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| |) | ss: |
| COUNTY OF SHAWNEE |) | |

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

John R. Wine, Jr.

Executed on September 1, 2016.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above Petition to Intervene was sent via email, this 1st day of September, 2016, to the following:

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