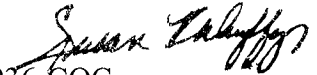


BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

SEP 19 2008

In the Matter of the Application of ITC)
Great Plains, LLC for a Limited Certificate) Docket Nos. 08-ITCE-936-COC
of Public Convenience to Transact the) 08-ITCE-937-COC
Business of an Electric Public Utility in the) 08-ITCE-938-COC
State of Kansas)



**MOTION OF PRAIRIE WIND TRANSMISSION, LLC
TO INTERVENE**

Prairie Wind Transmission, LLC (Prairie Wind) moves that the Commission issue its order allowing Prairie Wind to intervene in these proceedings. In support of its Motion, Prairie Wind states:

1. Prairie Wind is a limited liability company duly incorporated under the laws of the state of Delaware and qualified to do business in the state of Kansas for the purpose of siting, constructing, owning, operating and maintaining bulk electric transmission facilities in the state of Kansas. Westar Energy, Inc. (Westar Energy) owns a 50% membership interest in Prairie Wind. The remaining 50% membership interest in Prairie Wind is owned by Electric Transmission America, LLC (ETA). ETA is a joint venture between AEP Transmission Holding Company, LLC, a wholly-owned subsidiary of American Electric Power Company, Inc. (AEP), and MEHC America Transco, LLC, a wholly-owned subsidiary of MidAmerican Energy Holdings Company (MEHC).

2. As its initial project, Prairie Wind proposes to construct a new 765 kV transmission system generally comprised of two segments. It is anticipated that one segment will run west-southwest from a new 765 kV or existing substation (belonging to Westar Energy or its subsidiary, Kansas Gas and Electric Company) near Wichita, Kansas to a new 765 kV substation near Medicine Lodge, Kansas and then west-northwest to a new or existing station near Spearville, Kansas. The

other segment will run from the new Medicine Lodge 765 kV substation south-southwest to the Kansas-Oklahoma border.

3. On May 19, 2008, 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 including the facilities discussed above. Prairie Wind's application is pending in Docket No. 08-PWTE-1022-COC. Except for the fact that Prairie Wind proposes to build its facilities at 765 kV, the Prairie Wind project is similar to the project proposed by ITC Great Plains, LLC (ITC) and would likely connect to the transmission grid at the same points as those proposed by ITC. Given the similarity of the proposed projects, it is clear that Prairie Wind's legal rights or interests may be substantially affected by this proceeding. K.A.R. 82-1-225(a)(2). Prairie Wind has an interest in the outcome of this proceeding that cannot be adequately represented by any other party. Further, the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing Prairie Wind to intervene. K.A.R. 82-1-225(a)(3).

4. In addition to undersigned counsel, the names, addresses and telephone numbers of Prairie Wind's representatives upon whom all notices, pleadings, correspondence, and other documents regarding this Application should be served are as follows:

Michael Lennen
Westar Energy, Inc.
Vice President, Regulatory Affairs
P.O. Box 889
818 S. Kansas Avenue
Topeka, Kansas 66601
(785) 575-6362
michael.lennen@westarenergy.com

Steve Weiss
MidAmerican Energy Company
Senior V.P. & General Counsel
4299 N.W. Urbandale Dr.
Urbandale, IA 50322
sweiss@midamerican.com
(515) 281-2644 (phone)
(515) 242-4398 (fax)

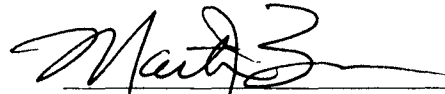
Kelly B. Harrison
Westar Energy, Inc.
Vice President, Transmission
Operations and Environmental
Services
P.O. Box 889
818 S. Kansas Avenue
Topeka, Kansas 66601
(785) 575-1636
kelly.b.harrison@westarenergy.com

Kevin F. Duffy
Assistant General Counsel
American Electric Power Service Corp.
1 Riverside Plaza
Columbus, Oh 43215
Phone: (614) 716-1617
Fax: (614) 716-1950
email: kfduffy@aep.com

5. Due to its clear interests in these matters, Prairie Wind respectfully requests that it be allowed to intervene and participate as a party to these dockets.

WHEREFORE, Westar requests that the Commission issue its order granting Prairie Wind's application to intervene in this matter for such other and further relief as may be appropriate.

Respectfully submitted,




Martin J. Bregman, #12618
Cathryn J. Dinges, #20848
818 Kansas Avenue
Topeka, Kansas 66612
(785) 575-1986; Telephone
(785) 575-8136; Fax

ATTORNEYS FOR
PRAIRIE WIND TRANSMISSION, LLC

VERIFICATION

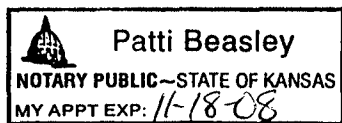
STATE OF KANSAS)
)
) ss:
COUNTY OF SHAWNEE)

Martin J. Bregman, being duly sworn upon his oath deposes and says that he is one of the attorneys for Prairie Wind Transmission, LLC; that he is familiar with the **Motion of Prairie Wind Transmission, LLP to Intervene** and that the statements therein are true and correct to the best of his knowledge and belief.



Martin J. Bregman

SUBSCRIBED AND SWORN to before me this 19th day of September, 2008.





Notary Public

My Appointment Expires:
November 18, 2008

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of September, 2008, the original and eight copies of the foregoing **Motion of Prairie Wind Transmission, LLP to Intervene** were delivered to:

Susan K. Duffy
Executive Director
KANSAS CORPORATION COMMISSION
1500 SW Arrowhead
Topeka, Kansas 66604

that one copy was delivered to:

NIKI CHRISTOPHER, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604

DANA BRADBURY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027

C. STEVEN RARRICK, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604

PATRICK T. SMITH, LIT. COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027

DAVID SPRINGE, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604

and that one copy was mailed to:

HEATHER H STARNES, ATTORNEY
415 NORTH MCKINLEY, SUITE 140
LITTLE ROCK, AR 72205

SUSAN B CUNNINGHAM, ATTORNEY
SONNENSCHN NATH & ROSENTHAL
1026 SW WEBSTER AVENUE
TOPEKA, KS 66604

JOHN WINE, JR.
410 NE 43RD
TOPEKA, KS 66617

KARL ZOBRIST, ATTORNEY
SONNENSCHN NATH & ROSENTHAL
4520 MAIN STREET, SUITE 1100
KANSAS CITY, MO 64111

CURTIS D. BLANC, MANAGING
ATTORNEY-REGULATORY
KANSAS CITY POWER & LIGHT CO.
1201 WALNUT (64106), PO BOX 418679
KANSAS CITY, MO 64141-9679

LINDSAY A SHEPARD, ATTORNEY
WATKINS CALCARA CHTD.
1321 MAIN ST, STE 300, PO DRAWER 1110
GREAT BEND, KS 67530

RICHARD A. SPRING, VICE PRESIDENT
KANSAS CITY POWER & LIGHT CO.
1201 WALNUT (64106), PO BOX 418679
KANSAS CITY, MO 64141-9679



Martin J. Bregman