2011.03.24 15:12:29 Kansas Corporation Commission /S/ Susan K. Duffy STATE CORPORATION COMMISSION

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

MAR 2 4 2011

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In the Matter of the Application of ITC Great Plains, LLC for a Siting Permit for the Construction of a Double-Circuit 345 kV Transmission Line in Ford, Clark, Kiowa, and Barber Counties, Kansas

Docket No. 11-ITCE-644-MIS

PETITION OF PRAIRIE WIND TRANSMISSION, LLC TO INTERVENE

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Prairie Wind Transmission, LLC (Prairie Wind) moves that the Commission issue its order allowing Prairie Wind to intervene in the above-captioned matter. In support of its Petition, 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. ITC Great Plains, LLC (ITC) proposes in the above-captioned docket to construct a double-circuit 345 kV transmission line from the Spearville Substation south to a new substation in Clark County, Kansas, and continuing east to a new substation in Barber County near Medicine Lodge, Kansas. The line proposed by ITC would connect to the line segments proposed by Prairie Wind in its siting application in Docket No. 11-PWTE-600-MIS at the new substation near Medicine

3. Because the lines proposed by Prairie Wind and ITC interconnect and jointly form an SPP priority project, Prairie Wind could be affected by any Commission order or activity in the above-captioned docket. 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 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

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

Cathyn Vinges Martin J. Bregman, #12618

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)

Cathryn J. Dinges, being duly sworn upon her oath deposes and says that she is one of the attorneys for Prairie Wind Transmission, LLC; that she is familiar with the **Petition of Prairie Wind Transmission**, LLP to Intervene and that the statements therein are true and correct to the best of her knowledge and belief.

<u>Cathryn Minges</u> Cathryn J. Dinges

SUBSCRIBED AND SWORN to before me this $34^{4^{\prime\prime}}$ day of March, 2011.

Sally Wilson

Notary Public

My Appointment Expires:

(0/19/2011

CERTIFICATE OF SERVICE

I hereby certify that on this 24^{44} day of March, 2011, the original and eight copies of the **Petition of Prairie Wind Transmission, LLP to Intervene** were hand-delivered to:

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

and that one copy was delivered to:

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

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

DELLA SMITH CITIZENS' UTILITY RATEPAYER BOARD 1500 SW ARROWHEAD ROAD TOPEKA, KS 66604

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CARL A. HUSLIG, PRESIDENT ITC GREAT PLAINS, LLC I100 SW WANAMAKER ROAD, SUITE 103 TOPEKA, KS 66604

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. athryn Jinges hryn J. Dinges



CATHRYN J. DINGES Corporate Counsel

March 24, 2010

STATE CORPORATION COMMISSION

MAR 2 4 2011

Julian Lake

Susan K. Duffy **Executive Director** Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, Kansas 66604

Re: In the Matter of the Application of ITC Great Plains, LLC for a Siting Permit for the Construction of a Double-Circuit 345 kV Transmission Line in Ford, Clark, Kiowa, and Barber Counties, Kansas; Docket No. 11-ITCE-644-MIS

Dear Ms. Duffy:

Enclosed please find the original and eight (8) copies of the Petition of Prairie Wind Transmission, LLC to Intervene.

Please file stamp one copy for my files.

Thank you for your assistance.

Sincerely,

Catheryn Vinges Cathryn J. Dinges

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Service List cc: