

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

JUL 09 2008

In the Matter of the Application of ITC)
Great Plains, LLC for a Limited Certificate)
of Public Convenience to Transact the)
Business of an Electric Public Utility in the)
State of Kansas.)

Docket Nos. 08-ITCE-936-COC
08-ITCE-937-COC
08-ITCE-938-COC

Susan K. Duffy Docket Room

**PETITION TO INTERVENE OF
KANSAS CITY POWER & LIGHT COMPANY**

Kansas City Power & Light Company (“KCPL”) respectfully requests that the Kansas Corporation Commission (“Commission”) grant it leave to intervene in the above-captioned proceedings. In support of its motion, KCPL offers the following:

1. On April 11, 2008, ITC Great Plains, LLC (“ITC”) submitted applications to amend its certificate of public convenience in the above-captioned dockets (the “Applications”). In the Applications ITC requests authority to construct, own and operate a transmission project referred to as the “V-Plan.” The V-Plan involves upgrades to the transmission systems of south central Kansas and north central Oklahoma. Specifically, ITC states that the V-Plan consists of three sections.

2. The first section is to run from the Spearville substation of Sunflower Electric Power Corporation (“Sunflower”) in Ford County to a switchyard that ITC intends to construct in Comanche County or Clark County. The second section is to run from the proposed ITC switchyard to a new substation located near Medicine Lodge in Barber County. The third section is to run from the proposed Medicine Lodge substation to a Westar substation near Wichita, Kansas. ITC filed three Applications in each of the respective above-captioned dockets, one for each of the three sections.

3. KCPL is a corporation duly organized and existing under the laws of the State of Missouri, and is located at 1201 Walnut, Kansas City, Missouri. It is engaged in the generation, transmission, distribution and sale of electric energy. KCPL distributes and sells electric service to the public in its certificated areas in the States of Kansas and Missouri, and is a “public utility” subject to

the jurisdiction, supervision and control of the Commission under Chapter 66 of the Kansas Statutes Annotated. KCPL is also a transmission owning member of SPP.

4. As a transmission owner operating in the same region as ITC, KCPL's operations will be impacted by ITC's proposed projects. As such, KCPL has a direct interest in these proceedings that cannot adequately be represented by any other party. Allowing KCPL to intervene at this time will not prejudice any party to the proceedings and will not impair the orderly conduct thereof.

5. All pleadings, orders, notices or other documents should be served on counsel named below and on the following:

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WHEREFORE, KCPL respectfully requests that the Commission issue an order permitting it to intervene and fully participate in any proceedings in these matters and for such further and other relief as may be appropriate.

Respectfully submitted,



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Counsel for Kansas City Power & Light Company

Dated: July 8, 2008

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was mailed, postage prepaid, this 8th day of July 2008, to all counsel of record in these proceedings.

A handwritten signature in black ink, appearing to read "C. Blanc", written over a horizontal line.

Curtis Blanc