

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

In the Matter of the Joint Application of)	
Sunflower Electric Power Corporation and)	
Mid-Kansas Electric Company, Inc. for an)	Docket No. 19-SEPE-054-MER
Order Approving the Merger of Mid-Kansas)	
Electric Company, Inc. into Sunflower Electric)	
Power Corporation)	

PETITION TO INTERVENE OF ITC GREAT PLAINS, LLC

COMES NOW ITC Great Plains, LLC. ("ITC Great Plains") and, pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, respectfully petitions the State Corporation Commission of the State of Kansas ("Commission") for intervention in the above-captioned matter. For its Petition to Intervene ("Petition"), ITC Great Plains states as follows:

1. On August 3, 2018, Sunflower Electric Power Corporation ("Sunflower") and Mid-Kansas Electric Company ("Mid-Kansas") filed an Application for approval of the merger of Sunflower and Mid-Kansas.

2. ITC Great Plains is an independent, stand-alone transmission company engaged exclusively in the development, ownership and operation of facilities for the transmission of electric energy in interstate commerce. ITC Great Plains is a subsidiary of ITC Holdings Corp., which is majority owned by Fortis Inc. and minority owned by GIC Private Limited. ITC Holdings Corp. invests exclusively in the electric power transmission grid to improve electric reliability, facilitate access to renewable and other generation, improve access to power markets, and reduce the overall cost of delivered electric power. Transmission service over facilities developed and owned by ITC Great Plains is provided by Southwest Power Pool ("SPP") pursuant to its Open Access Transmission Tariff. ITC Great Plains is a Transmission Owner member of SPP.

3. Many of ITC Great Plains' transmission facilities are located in Sunflower's and Mid-Kansas' service territories in Kansas, including facilities which are directly interconnected to facilities which will be owned by the newly-combined Sunflower proposed herein. As a result, ITC Great Plains has a direct interest in the issues to be addressed in this docket and such interest cannot be adequately represented by any other party.¹ Further, ITC Great Plains' legal interests are not adequately represented by any existing party. Finally, the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by allowing ITC Great Plains to intervene.²

4. In addition to the undersigned counsel, copies of all pleadings, notices, orders and other documents should be mailed to the following individual:

James W. Bixby
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¹ K.A.R. 82-1-225(a)(2).

² K.A.R.82-1-225(a)(3).

WHEREFORE, for the above and foregoing reasons, ITC Great Plains respectfully requests that the Commission grant its Petition to Intervene in this docket.

Respectfully submitted,



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Attorney for ITC Great Plains, LLC

VERIFICATION
(K.S.A. 56-601)

STATE OF KANSAS

COUNTY OF SHAWNEE)

I, Holly L. Fisher, being of lawful age and duly sworn, state that I am the counsel of record for ITC Great Plains, LLC. I have caused the foregoing Motion for Admission Pro Hac Vice of James W. Bixby to be prepared; I have read and reviewed the Motion; and the contents thereof are true and correct to the best of my information, knowledge and belief.

Executed on August 15, 2018

A handwritten signature in blue ink, reading "Holly L. Fisher", is written over a horizontal line.

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was served via electronic mail, U.S. Mail or hand-delivered on this 15th day of August, 2018, to the persons appearing on the Commission's service list, as last modified on August 15, 2018

Holly L. Fisher

A handwritten signature in blue ink, reading "Holly L. Fisher", is written over a horizontal line.