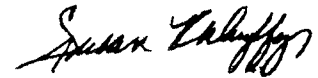


JAN 13 2009

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS



Before Commissioners: Thomas E. Wright, Chairman
 Michael C. Moffet
 Joseph F. Harkins

In the Matter of the Application of ITC Great)
Plains, LLC to Amend Its Certificate of Public)
Convenience and Authority to Transact the) 2009.01.13 10:16:19
Business of an Electric Public Utility in the) Kansas Corporation Commission
State of Kansas (Ford, Kiowa, Clark and) /s/ Susan K. Duffy
Comanche Counties).) Docket No. 08-ITCE-936-COC

In the Matter of the Application of Prairie Wind)
Transmission, LLC, for a Certificate of Public)
Convenience to Transact the Business of an) Docket No. 08-PWTE-1022-COC
Electric Public Utility in Ford, Kiowa, Clark,)
Comanche, Barber, Pratt, Harper, Kingman,)
Sumner and Sedgwick Counties, Kansas.)

CURB's Response to Petitions for Reconsideration

The Citizens' Utility Ratepayer Board (CURB) responds in support of the petitions for reconsideration of (1) Mid-Kansas Electric Company, LLC and Sunflower Electric Power Corporation, and (2) ITC Great Plains, LLC, which were filed in the above-captioned dockets on January 5, 2009.

1. In their petitions, the Petitioners raised numerous substantive legal questions that must be resolved by the Commission before these dockets can move forward. Without taking a position at this juncture for or against any of the parties or their substantive positions in this docket, CURB agrees with the Petitioners that the Commission needs to resolve the inconsistencies and conflicts between its December 18, 2009, procedural order in this docket and

its approval in Docket No. 07-ITCE-380-COC of procedures to be utilized in certification proceedings. Further, the incumbent transmission owners have raised legitimate concerns about their rights and obligations vis-à-vis the 380 Docket, the Open Access Transmission Tariff and relevant Kansas statutes in light of the December 18 order. It is virtually impossible to move forward with settlement talks in any meaningful fashion without resolving the conflicts and inconsistencies identified by the Petitioners in their petitions for reconsideration. Failure to do so would considerably add to the time and expense of settlement efforts and would risk delay in finally resolving the substantive questions that are the subject matter of this docket.

Therefore, CURB respectfully requests that the Commission grant the Petitioners reconsideration and clarification of the issues they raised in their January 5 petitions.

Respectfully submitted,



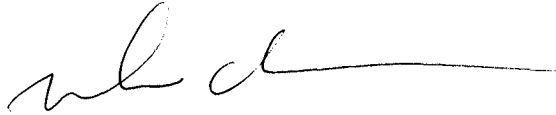
Niki Christopher #19311
David Springe #15619
Citizens' Utility Ratepayer Board
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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

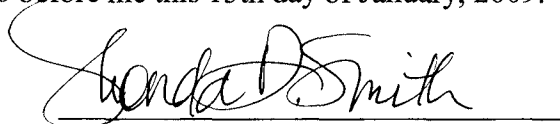
I, Niki Christopher, of lawful age, being first duly sworn upon her oath states:

That she is an attorney for the above named petitioner; that she has read the above and foregoing document, and, upon information and belief, states that the matters therein appearing are true and correct.



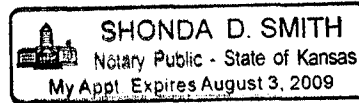
Niki Christopher

SUBSCRIBED AND SWORN to before me this 13th day of January, 2009.



Notary of Public

My Commission expires: 8-03-2009.



CERTIFICATE OF SERVICE

08-ITCE-936-COC & 08-PWTE-1022-COC

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 13th day of January, 2009, to the following:

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