## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Grain ) Belt Express Clean Line LLC for Approval ) EN of its Acquisition by Invenergy Transmission LLC )

EM-2019-0150

## <u>APPLICATION TO INTERVENE BY THE</u> <u>MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION</u>

The Missouri Joint Municipal Electric Utility Commission (MJMEUC), by and through their attorneys, Douglas L. Healy and Peggy A. Whipple, of Healy Law Offices, LLC, pursuant to Missouri Public Service Commission ("Commission") rule 4 CSR 240-2.075, files its Application to Intervene in the referenced case. In support thereof, MJMEUC states as follows:

- On February 1, 2019, Invenergy Transmission LLC, on behalf of itself and its parent company Invenergy Investment Company LLC, as well as Grain Belt Express Clean Line LLC on behalf of itself and its parent company Grain Belt Express Holding LLC, jointly submitted an application to approve the transaction allowing Grain Belt Express Clean Line LLC to be acquired by Invenergy Transmission LLC.
- On February 4, 2019, the Commission issued its Order Directing Notice and Setting Intervention Date, which set an intervention deadline of February 25, 2019.
- 3. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise the public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Seventy Missouri municipalities are current parties to the joint contract establishing the MJMEUC.

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- 4. The MJMEUC has an interest that is different from that of the general public, in that it represents the interest of municipal electrical systems throughout the state, as well as having entered into a transmission service agreement to utilize the proposed Grain Belt Express Clean Line LLC HVDC transmission line to deliver power to MJMEUC members. Such interest is not currently represented in the proceedings.
- 5. The MJMEUC supports the transaction application and requests the Commission approve such application.
- Granting intervention to the MJMEUC would serve the public interest by allowing the MJMEUC's potential benefit, experience and insight to be part of the transaction application.

WHEREFORE, the MJMEUC prays that this Commission issue an order granting its application to intervene in this proceeding and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

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## **ATTORNEYS FOR MJMEUC**

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Application to Intervene was served by electronically filing with EFIS and serving via email or U.S. mail, postage prepaid, a copy to the following interested persons on this 18th day of February, 2019:

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