BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Entergy Arkansas, Inc.'s)	
Notification of Intent to Change Functional)	
Control of Its Missouri Electric Transmission)	
Facilities to the Midwest Independent)	File No. EO-2013-0431
Transmission System Operator Inc Regional)	
Transmission System Organization or Alternative)	
Request to Change Functional Control and Motions)	
for Waiver and Expedited Treatment)	

APPLICATION TO INTERVENE OF THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION

COMES NOW, the Missouri Joint Municipal Electric Utility Commission ("MJMEUC"), pursuant to Missouri Public Service Commission ("Commission") rule 4 CSR 240-2.075, and files its Application to Intervene in the referenced case. In support thereof, MJMEUC states as follows:

- On March 21, 2013, Entergy Arkansas, Inc. ("EAI") filed a notice of intent to change functional control of its Missouri transmission facilities to the Midwest Independent Transmission System Operator ("MISO")
- 2. On March 22, 2013 the Commission established a deadline for interventions by April 1, 2013.
- 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 public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. MJMEUC members serve approximately 347,000 retail customers, with a combined load of over 2,600 MW.

- 4. MJMEUC has 1 municipal member (Thayer, Missouri) directly embedded in EAI's Missouri transmission system that takes transmission service from Entergy Services which acts as an agent for EAI. Such city does not currently take transmission services from MISO, but would be forced into the MISO market as a result of the application by EAI.
- 5. MJMEUC itself is a transmission customer of Entergy Services acting as an agent of EAI.
- 6. MJMEUC's interest is different from that of the general public, in that it represents the interest of municipal electrical systems, as well as a municipal electrical system that takes transmission through EAI's Missouri assets, and in that MJMEUC and some of its members take transmission service through Entergy Services, which acts as an agent of EAI. Such interest is not currently represented in the proceedings. MJMEUC would be faced with regulatory and operational burdens as a result of a change from the current EAI Open Access Transmission Tariff (OATT) to MISO's OATT. Whether the benefits of such a change outweigh the imposed burden and additional costs between EAI's OATT and MISO's OATT is unknown.
- 7. MJMEUC takes no position on the relief requested by applicants at this time, but reserves the right to change their position.
- 8. Communications in regard to this Application should be addressed to:

Douglas L. Healy Healy & Healy, LLC 939 Boonville, Suite A Springfield, MO 65802 dhealy@mpua.org WHEREFORE, MJMEUC prays that this Commission issue an order granting its application to intervene and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: /s/ Douglas L. Healy
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ATTORNEY FOR MJMEUC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application to intervene was served by emailing a copy to all parties on the Commission's Service List this 1st day of April, 2013.

/s/ Douglas L. Healy
DOUGLAS L. HEALY