BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of South)		
Central MCN LLC for Approval of Transfer of)		
Assets; a Certificate of Convenience and)	File No	
Necessity; and a Motion for Expedited)		
Treatment)		

MOTION FOR EXPEDITED TREATMENT

South Central MCN LLC (SCMCN) hereby submits this Motion for Expedited Treatment pursuant to 4 CSR 240-2.080(14), and in support thereof states as follows:

- 1. On August 19, 2015, SCMCN filed an Application pursuant to Sections 393.170 and 393.190 RSMo., 4 CSR 240-2.060, 4 CSR 240-3.105, and 4 CSR 240-3.110 for a certificate of convenience and necessity and any necessary approval authorizing it to acquire certain existing transmission assets (Assets) from the City of Nixa, Missouri (the City). Upon purchase, the Assets will be transferred to the functional control of the Southwest Power Pool (SPP) and integrated into the SPP transmission system. Because the Assets will be owned by a transmission-only company with no retail customers, the Federal Energy Regulatory Commission will have sole jurisdiction over the rates, terms and conditions of service of the Assets. Because the Assets are currently owned by a non-regulated municipal utility, their use is not subject to rate base, rate-of-return regulation by any state utility commission.
- 2. Action by the Commission by no later than October 30, 2015 is necessary in order for SCMCN and the City to consummate the Transaction effective December 1, 2015.
- 3. SCMCN therefore respectfully requests that the Commission enter an order approving the relief requested by the Application by no later than October 30, 2015.
- 4. There will be no negative effect on SCMCN's customers or the general public if the Commission acts by such date.

5. The Application was filed by SCMCN as soon as reasonably possible after SCMCN and the City executed the asset purchase agreement on August 14, 2015, under which SCMCN agreed to purchase and the City agreed to sell the Assets.

Respectfully submitted,

/s/ Terry M. Jarrett

Terry M. Jarrett, Missouri Bar #45663 Healy Law Offices, LLC 514 East High Street, Suite 22 Jefferson City, MO 65101 Phone: (573) 415-8379

Fax: (573) 415-8379

Email: terry@healylawoffices.com

Alison M. Nelson, Missouri Bar #58004 Husch Blackwell LLP 190 Carondelet Plaza, Suite 600 St. Louis MO 63105-3433 Phono: (214) 490 1502

Phone: (314) 480-1592 Fax: (314) 480-1505

Email: <u>ali.nelson@huschblackwell.com</u>

Lowell Pearson, Missouri Bar #46217 Husch Blackwell LLP 235 East High Street, P.O. Box 1251 Jefferson City, MO 65101-3206

Phone: (573) 761-1115 Fax: (573) 634-7854

Email: lowell.pearson@huschblackwell.com

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing has been served upon all parties of record by forwarding the same by electric mail or U.S. Mail, postage prepaid, this 19th day of August, 2015, to the following:

Office of the Public Counsel P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

General Counsel
Missouri Public Service Commission
P.O. Box. 360
Jefferson City, MO 65102
staffcounselservice@psc.mo.gov

<u>/s/ Lowell Pearson</u>
Lowell Pearson, Husch Blackwell LLP