

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Joint Application)
of Entergy Arkansas, Inc., Mid South)
TransCo LLC, Transmission Company)
Arkansas, LLC and ITC Midsouth LLC)
for Approval of Transfer of Assets and) File No. EO-2013-0396
Certificate of Convenience and Necessity,)
and Merger and, in connection therewith,)
Certain Other Related Transactions)

ITC MIDSOUTH LLC’S REPLY REGARDING
APPLICATIONS TO INTERVENE AND SCOPE OF PROCEEDINGS

COMES NOW ITC Midsouth LLC (“ITC Midsouth”), pursuant to 4 CSR 240-2.080, and hereby replies to the applications to intervene filed herein as follows:

1. This matter only concerns the specific issues presented in the Joint Application, which involve whether Entergy Arkansas, Inc.’s limited transmission assets in Missouri that were the recent subject of File No. EA-2012-0321 can be ultimately transferred to an affiliate of ITC Midwest LLC, which already operates in Missouri with certificate issued in File No. EO-2007-0485, and related changes to and/or issuance of certificates of convenience and necessity and waivers.
2. Such proceedings typically are resolved by the Commission promptly and without hearing.
3. MJMEUC’s Application to Intervene does not identify any particular issues or concerns with the Application.

4. Empire's Application to Intervene appears to discuss issues related to its transmission connections with Entergy in Arkansas.

5. KCPL's and GMO's Application to Intervene erroneously describes the Application as being related to Entergy's entry into the MISO RTO, when in actuality that is a separate matter being pursued by Entergy before FERC and the commissions in states in which Entergy has regulated retail operations.

6. Because the proposed transaction is time-sensitive, ITC respectfully requests that the Commission require any parties to this proceeding to promptly and specifically identify the issue(s) related to the limited scope of this proceeding which are of concern to them.

WHEREFORE, ITC Midsouth LLC requests that the Commission grant the relief requested herein in connection with its consideration of the applications to intervene.

Respectfully submitted,

/s/ Carl J. Lumley

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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 electronic mail and/or first class mail, postage prepaid this 7th day of March 2013 to the following:

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