BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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 Certificate of Convenience and Necessity, and Merger and, in connection therewith, Certain Other Related Transactions.	) Case No. EO-2013-0396
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 Transmission System Operator, Inc. Regional Transmission System Organization or Alternative Request to Change Functional Control and Motions for Waiver and Expedited Treatment.	) Case No. EO-2013-0431

MISSOURI JOINT MUNCIPAL ELECTRIC UTILITY
COMMISSION'S STATEMENT OF POSITION

COME NOW, the Missouri Joint Municipal Electric Utility Commission ("MJMEUC") and, pursuant to the Commission's April 18, 2013 Order Granting Interventions and Setting Procedural Schedule, hereby files its Statement of Position on the issues identified in the List of Issues filed by Kansas City Power & Light ("KCPL"), KCPL-GMO ("GMO"), Empire and MJMEUC.

I. LIST OF ISSUES

I. Issues in Case No. EO-2013-0396

A. Have the Joint Applicants in Case No. EO-2013-0396[1] met their burden to provide sufficient information to the Commission so that the Commission may make a determination regarding whether the transfer of EAI's Missouri transmission assets and its certificate of convenience and necessity is not detrimental to the public interest?

MJMEUC Position: No.

[1] Joint Applicants are Entergy Arkansas, Inc. ("EAI"), Mid South TransCo LLC ("Mid South"), Transmission Company Arkansas, LLC ("TC Arkansas") and ITC Midsouth LLC ("ITC Midsouth").

B. Have the Joint Applicants in Case No. EO-2013-0396 demonstrated that there is no net detriment to Missouri customers that may result from the contemplated merger?

MJMEUC Position: No.

C. Have the Joint Applicants in Case No. EO-2013-0396 documented and supported the increase in transmission rates that is likely to occur as a result of the merger?

MJMEUC Position: No.

D. Have the Joint applicants demonstrated any incremental benefit to Missouri customers that will offset the projected increases in transmission rates caused by the increased ROE and higher equity component in capital structure associated with the transfer of its Missouri transmission assets to ITC?

MJMEUC Position: No.

E. Have the Joint Applicants adequately addressed the issues of safety and reliability that may arise as a result of the proposed transaction?

MJMEUC Position: No.

II. Issues in Case No. EO-2013-0431

A. Has EAI met its burden to provide sufficient information to the Commission so that the Commission may make a determination regarding whether the transfer of functional control of EAI's Missouri transmission assets to MISO is not detrimental to the public interest?

MJMEUC Position: No.

B. Has EAI documented and supported the increase in transmission rates that is likely to occur as a result of the transfer of functional control to MISO?

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MJMEUC Position: No.

C. Has EAI adequately addressed the issues of safety and reliability that may arise as a result of the proposed transaction?

MJMEUC Position: No.

D. Has EAI demonstrated that there will be no net detriment to Missouri transmission operations and the power market seam in Missouri as a result of the proposed transaction?

MJMEUC Position: No.

E. Has EAI demonstrated any incremental benefit to Missouri customers that will offset the projected increases in transmission rates caused by the application of Through and Out rates as a result of transmission service moving to the MISO Tariff?

MJMEUC Position: No.

F. Has EAI demonstrated a net benefit to Missouri customers that will offset the rate impacts to such customers as a result of the decrease in KCP&L's off-system sales margin?

MJMEUC Position: No.

G. Has EAI demonstrated that KCP&L, GMO, Empire, and MJMEUC will be held harmless with respect to cost compensation due to EAI's voluntary choice to place its transmission assets under MISO?

MJMEUC Position: No.

H. Are there conditions that the Commission could impose on this transfer that would allow for a finding that the transfer of functional control is not detrimental to the public interest?

MJMEUC Position: Yes. The Joint Applicants have the burden of proof before the Commission to show that these transactions are not detrimental to the public interest. If these transactions are not detrimental to the public interest, then it should not be a burden to the Joint Applicants to be required to hold MJMEUC harmless from the results of these transactions.

Respectfully submitted,

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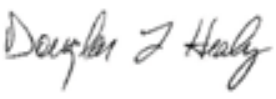
CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to all counsel of record in this case this 12th day of June, 2013.



Douglas L. Healy