

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

In the Matter of the Application of)	
GridLiance High Plains LLC)	
for Authority to Sell Certain Assets to the)	Case No. EM-2022-0156
Missouri Joint Municipal Electric Utility)	
Commission and, in Connection Therewith,)	
Certain Other Related Transactions.)	

**APPLICATION TO INTERVENE OF THE
MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION**

COMES NOW the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), by and through counsel, pursuant to Commission Rule 20 CSR 4240-2.060, and respectfully files its Application to Intervene in this matter. In support of this Application, MJMEUC states as follows:

1. On December 10, 2021, GridLiance High Plains LLC (“GridLiance HP”) filed an Application and Motion for Waiver (“Application”) for authority to sell certain assets to MJMEUC and certain other related transactions. On December 13, 2021, the Commission issued its Order setting a deadline of January 18, 2022, for filing Applications for Intervention.

2. MJMEUC is a joint action agency and a body corporate and politic of the State of Missouri and, as such, is not subject to the jurisdiction of the Commission. MJMEUC is authorized by §§393.700 to 393.770, R.S.Mo. to construct, operate and maintain jointly owned transmission and generation facilities for the production and transmission of electric power for its members, to purchase and sell electric power and energy, and to enter into agreements with any person for the transmission of electric power. MJMEUC is organized on a state-wide basis to promote efficient wheeling, pooling, generation, and transmission arrangements to meet the

power and energy requirements of the municipal electric utilities in the State of Missouri. MJMEUC's membership includes seventy municipal entities in Missouri and four advisory members in Arkansas. Together, MJMEUC's members serve some 347,000 retail electric customers.

3. Correspondence, communications, orders and the decision in this matter should be addressed to:

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4. As GridLiance HP noted in its Application, GridLiance HP and MJMEUC entered into an Asset Purchase Agreement ("Agreement") on October 12, 2021 for the sale of the Southwest Missouri Assets to MJMEUC.


5. As a party to the Agreement, MJMEUC has an interest that is different from that of the general public, in that it could be directly and adversely affected by any decision of this Commission regarding the sale of the Southwest Missouri Assets to MJMEUC. MJMEUC has a direct and immediate interest in this proceeding that is not currently represented in this matter.

6. MJMEUC supports GridLiance HP's Application and Motion for Waiver.

WHEREFORE, MJMEUC respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this proceeding.

Respectfully Submitted,

HEALY LAW OFFICES, LLC

By: 
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ATTORNEYS FOR MJMEUC

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 30th day of December, 2021.



Douglas L. Healy