

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

In the Matter of the Joint Application of)
GridLiance High Plains LLC, GridLiance GP,)
LLC, and GridLiance Holdco, LP (“GridLiance”))
NextEra Energy Transmission Investments, LLC,) Case No. EM-_____
and NextEra Energy Transmission, LLC)
 (“NextEra Entities”) for approval of the)
Acquisition of GridLiance by the NextEra)
Entities)

**JOINT APPLICANT’S REQUEST FOR WAIVER OF REQUIREMENT TO FILE
NOTICE OF INTENDED CASE FILING**

COME NOW NextEra Energy Transmission Investments, LLC (“NETI”), and NextEra Energy Transmission, LLC (“NEET”), as well as GridLiance High Plains LLC (“GridLiance HP”), GridLiance GP, LLC, and GridLiance Holdco, LP (“GridLiance Holdco”) (collectively the “GridLiance Entities”) together, the “Joint Applicants,” and, pursuant to 20 CSR 4240-4.017(1)(D), hereby file this request for waiver of the notice provision of 20 CSR 4240-4.017(1). In support of this request, Joint Applicants respectfully state as follows:

1. As described in more detail in the Joint Application and the attached supporting materials, NEET and NETI have agreed to acquire the upstream ownership interests of the GridLiance Entities, including GridLiance HP (the “Proposed Transaction”). This acquisition will occur at the holding company level and GridLiance HP will remain the operating public utility in Missouri. The Proposed Transaction will leave in place the direct and indirect wholly-owned subsidiaries of GridLiance Holdco, including GridLiance HP, and all intermediary holding companies, and all of the subsidiaries’ licenses, registrations, permits, personnel, facilities, and credit facilities.

2. To the extent the Commission finds that it has jurisdiction over the Proposed Transaction, Joint Applicants seek waiver of the 60-day notice requirement under 20 CSR 4240-4.017(1). 20 CSR 4240-4.017(1) provides, in part, as follows:

Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall detail the type of case and issues likely to be before the commission and shall include a summary of all communication regarding substantive issues likely to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice.

3. 20 CSR 4240-4.017(1)(D) permits a party to request a waiver of the above-cited rule for good cause. The rule specifically provides that good cause may be established by submitting a verified declaration that the filing party has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case. Joint Applicants confirm that there has been no communication with a member of the office of the Commission, and have attached to this request verified declarations that the Joint Applicants nor any person or entity acting on behalf of any of the Joint Applicants have had a communication with a member of the office of the Commission in the last 150 days regarding any substantive issue likely to arise in the case. For this reason, Joint Applicants request that the Commission grant a waiver of the 60-day notice requirement.

4. Independent of this justification, Joint Applicants also assert that good cause exists for a waiver of the 60-day notice requirement in that the terms of the Purchase and Sale Agreement governing the Proposed Transaction were finalized on September 29, 2020. Since September 29, 2020, Joint Applicants have had informal discussions with the Commission Staff to explain the Proposed Transaction, to answer any immediate questions the Staff may have, and to note that a Joint Application would be forthcoming in the near term. Accordingly, Staff is aware of the Proposed Transaction and Joint Applicants intention to file the Joint Application, and, therefore,

Staff will not be prejudiced by a waiver of the 60-day notice requirement. Also, no other party will be prejudiced by waiver of the 60-day notice requirement, because the Joint Application raises limited issues, in part because GridLiance HP is rate-regulated by the Federal Energy Regulatory Commission and not this Commission. To the extent there are other issues, interested parties will be given a reasonable opportunity to explore those issues pursuant to a procedural schedule established at a prehearing conference, which Joint Applicants are requesting in another Motion filed simultaneously herewith.

5. Finally, granting this request for waiver will allow the Joint Application to be considered by the Commission on a more expedited basis, and, if the Proposed Transaction is approved, the financial, managerial and technical expertise of NEET will benefit GridLiance HP's Missouri operations in a timely fashion.

Respectfully submitted,

/s/ Anne E. Callenbach

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ATTORNEYS FOR NEXTERA TRANSMISSION
INVESTMENTS, LLC AND NEXTERA ENERGY
TRANSMISSION, LLC

/s/ Dean L. Cooper

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Jefferson City, MO 65102
Phone: (573) 635-7166
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ATTORNEYS FOR GRIDLIANCE GP, LLC,
GRIDLIANCE HOLDCO, LP., AND
GRIDLIANCE HIGH PLAINS LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by e-mail or U.S. mail, postage prepaid, this 20th day of October, 2020.

/s/ Anne E. Callenbach

ATTORNEYS FOR NEXTERA TRANSMISSION
INVESTMENTS, LLC AND NEXTERA ENERGY
TRANSMISSION, LLC

**BEFORE THE PUBLIC SERVICE COMMISSION
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NextEra Energy Transmission Investments, LLC,) Case EM-
and NextEra Energy Transmission, LLC)
 (“NextEra Entities”))
for approval of the Acquisition of GridLiance by)
the NextEra Entities)

VERIFIED DECLARATION

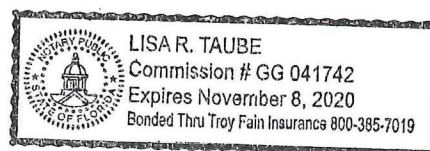
State of Florida)
)
) ss
)
County of Palm Beach)

I, Eric Gleason, being of lawful age, hereby state that I am President of NextEra Energy Transmission, LLC, that I have read the foregoing Request for Waiver, and hereby declare that neither NextEra Energy Investments, LLC, NextEra Energy Transmission LLC, nor any person or entity acting on behalf thereof has had communications with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the above-referenced matter.


Eric Gleason

Subscribed and sworn to before this 19th day of October, 2020.


Notary Public



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

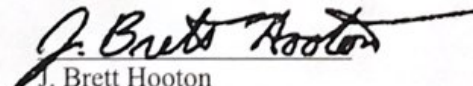
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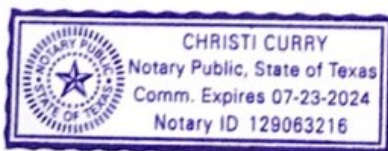
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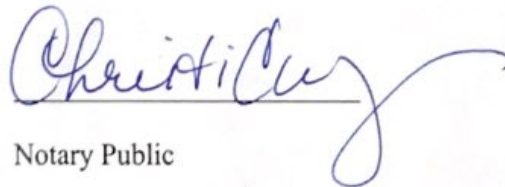
State of Texas)
)
) ss
)
County of Dallas)

I, J. Brett Hooton, being of lawful age, hereby state that I am President of GridLiance High Plains LLC that I have read the foregoing Request for Waiver, and hereby declare that neither GridLiance High Plains LLC, GridLiance GP, LLC, and GridLiance Holdco, LP nor any person or entity acting on behalf thereof has had communications with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the above-referenced matter.


J. Brett Hooton

Subscribed and sworn to before this 19th day of October, 2020.




Notary Public