

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

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| In the Matter of the Application of |) | |
| Transource Missouri, LLC for a Certificate |) | |
| of Convenience and Necessity Authorizing |) | |
| it to Own, Operate, and Maintain the |) | Case No. EA-2016-0190 |
| Switch Station Necessary for the Interconnection |) | |
| of the Osborn Wind Energy Center with the |) | |
| Sibley-Nebraska City Electric Transmission |) | |
| Project |) | |

**TRANSOURCE MISSOURI'S VERIFIED RESPONSE
TO STAFF'S MEMORANDUM RECOMMENDATION**

COMES NOW, Transource Missouri LLC, by and through counsel, provides the following verified response pursuant to 4 CSR 240-2.080 to "Staff's Memorandum Recommendation" ("Recommendation"):

1. On August 25, 2016 the Commission Ordered Staff to file a recommendation regarding Transource Missouri's application for a certificate of convenience and necessity for a Switch Station to interconnect the Osborn Wind Energy Center with the Applicant's Sibley-Nebraska City transmission line.

2. On September 20, 2016 Staff filed its Recommendation. In the Recommendation Staff agrees that "Transource Missouri meets the criteria that the Commission has used in the recent past for granting a CCN for the construction of electric plant." Recommendation at 14.

3. The Recommendation provides that "as a condition of granting Transource Missouri a CCN in this proceeding, Transource Missouri should direct Transource Missouri to file on an annual basis its current annual FERC FORM 1 with this Commission at the same time it makes its annual filing with the FERC and this filing be deemed to be in lieu of the filing

required by 4 CSR 240-3.164." Recommendation at 15. Transource Missouri commits to file the FERC FORM 1 on an annual basis at the same time it makes such filing with the FERC.

4. The Recommendation also provides, "[T]he Staff proposes that as a condition of granting Transource Missouri a CCN, Transource Missouri should agree to file with the Commission, as soon as they are available, the final engineering deliverables, including design packages, procurement delivery schedules, construction contract bid technical specifications." Recommendation at 16. Transource Missouri will provide these deliverables to the Commission as soon as they are available to Transource Missouri.

5. As Staff recommends approval of the CCN with conditions acceptable to Transource Missouri, Transource Missouri will not respond to either Section 1 of the Recommendation or Paragraph 26 of the Recommendation regarding the requirements of 4 CSR 240-3.105(1)(B)(2). Transource Missouri's acceptance of the recommended conditions provided by Staff should not be deemed agreement, acquiescence, or waiver of any legal position held by Transource Missouri in this case or any future case.

WHEREFORE, Transource Missouri requests the Commission approve Transource Missouri's Application for a Certificate of Convenience and Necessity Authorizing it to Own, Operate, and Maintain a Switchyard Necessary for the Interconnection of the Osborn Wind Energy Center with the Sibley-Nebraska City Electric Transmission Project.

September 22, 2016

Respectfully submitted,

/s/ Karl Zobrist

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Attorneys for Transource Missouri, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Verified Response to Staff's Memorandum Recommendation was served upon the parties listed below by email or U.S. Mail, postage period, below this 22nd day of September, 2016.

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/s/ Joshua Harden

Attorneys for Transource Missouri, LLC

AFFIDAVIT

STATE OF MISSOURI)
) SS.

COUNTY OF Jackson)

I, Todd L. Miller, being duly affirmed according to the law, depose and state that I am Vice President of Transource Missouri, LLC ("Transource Missouri"), that I am authorized to make this affidavit on behalf of Transource Missouri, and that I verify that the facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

Subscribed and sworn to before me this 22 day of September, 2016.

Karen M. Smith
Notary Public

My Commission Expires:

April 16, 2020

