BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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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, and NextEra Energy Transmission, LLC ("NextEra Entities") for approval of the Acquisition of GridLiance by the NextEra Entities

Case No. EM-2021-0114

BRIEF OF THE MISSOURI JOINT MUNICIPAL ELECRIC UTILITY COMMISSION

COMES NOW the Missouri Joint Municipal Electric Utility Commission ("MJMEUC"), by and through counsel, and with respect to the above-captioned matter states as follows:

On January 5, 2021, the Commission issued its *Order Directing the Filing of Briefs Regarding the Issue of the Commission's Jurisdiction*. In that Order, the Commission directed that staff shall, and any other party may, file a brief addressing whether the Commission has jurisdiction over this matter on or before January 19, 2021.

In its Application to Intervene in this matter, MJMEUC stated that its interest in intervening in this matter is not to interfere with the proposed transaction between GridLiance and NextEra, but to preserve all of MJMEUC's rights, claims, and interests pursuant to the terms of MJMEUC's contract with GridLiance—including, but not limited to, its right to re-purchase the Nixa Assets. That continues to be MJMEUC's interest in this matter.

MJMEUC takes no position on whether the Commission has jurisdiction over this matter. However, if the Commission determines that it does have jurisdiction, then MJMEUC requests that the Commission take into consideration MJMEUC's interests and contractual rights relating to the Nixa Assets. WHEREFORE, MJMEUC respectfully submits its Brief.

Respectfully Submitted,

ARMSTRONG TEASDALE LLP

By: <u>/s/ Jeffrey L. Schultz</u>

ATTORNEYS FOR MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION

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 19th day of January, 2021.

/s/ Jeffrey L. Schultz