

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

In the Matter of the Application of)	
Transource Missouri, LLC for a Certificate)	
of Convenience and Necessity Authorizing)	
it to Own, Operate, and Maintain a)	Case No. EA-2016-0188
Switch Station Necessary for the Interconnection)	
of the Rock Creek Wind Project with the)	
Sibley-Nebraska City Electric Transmission)	
Project)	

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

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

1. As directed by the Commission Order issued March 9, 2016 Staff filed its "Staff's Memorandum Recommendation" (Staff's Recommendation) on March 16, 2016.

2. Staff's Recommendation provides 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." Staff's Recommendation, p. 10. The Staff also concurs with Transource Missouri's request for a waiver the 60-day filing rule, expedited treatment and relief from other filing requirements. Id.

3. Staff also requests that the Commission impose the following condition:

Transource Missouri has not filed plans and specifications for the complete construction project pursuant to 4 CSR 240-3.105(1)(B)(2). As a consequence, the Staff proposed 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 engineering deliverables, including design packages, procurement delivery schedules, construction contract bid technical specifications, and Holt County testing and checkout, etc. that are addressed in the Table below: "Project Development And Coordination Milestones," on page C-4, of Appendix C to the Generation Interconnection Agreement, which is Exhibit 4 to Transource Missouri's Application, starting with 30% design submittal. Id. at 10-11.

4. While Transource Missouri believes it has "filed plans and specifications for the complete construction project[.]" sufficient to comply with Commission rule 4 CSR 240-3.105(1)(B)(2), Staff correctly notes, on the basis of the "Generation Interconnection Agreement between Transource Missouri, Rock Creek Wind Project and Southwest Power Pool" (hereinafter, "Rock Creek GIA"), that more detailed plans and specifications will become available as the project progresses. Regardless, Transource Missouri agrees to file the documents Staff has requested when those documents become available to Transource Missouri. All additional design and specification documents provided to Staff will be marked and should be considered Highly Confidential.

5. As Staff recommends approval of Transource Missouri's CCN application and Transource Missouri agrees to provide Staff with the documents it requested, Transource Missouri will not respond to Section I of Staff's Recommendation regarding PSC jurisdiction. Transource Missouri's decision not to respond does not indicate its agreement with Section I of Staff's Recommendation.

THEREFORE, 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 Rock Creek Wind Project with the Sibley-Nebraska City Electric Transmission Project.

_____, 2016

Respectfully submitted,

/s/ Karl Zobrist

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application was served upon the parties listed below by email or U.S. Mail, postage period, below this 21st day of March, 2016.

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/s/ Karl Zobrist
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AFFIDAVIT

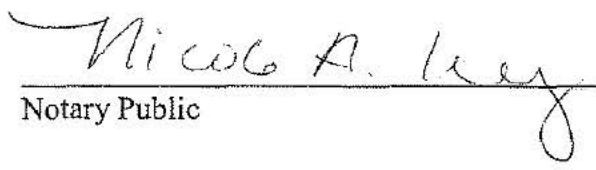
STATE OF MISSOURI)
) SS.
COUNTY OF JACKSON)

I, Todd E. Fridley, 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.



Todd E. Fridley

Subscribed and sworn to before me this 21st day of March, 2016.



Notary Public

My Commission Expires:

