## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

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In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing It to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood – Montgomery 345 kV Transmission Line

File No. EA-2014-0207

## APPLICATION OF TRANSOURCE MISSOURI LLC FOR LEAVE TO INTERVENE

Pursuant to 4 CSR 240-2.075 and the order issued by the Missouri Public Service Commission ("Commission") on March 27, 2014 in the above-captioned proceeding, Transource Missouri LLC ("Transource") hereby applies to intervene and to become a party to the abovecaptioned case. In support thereof, Transource state as follows:

1. Transource is a Delaware limited liability corporation qualified to conduct business in Missouri, with its principal place of business located at 1 Riverside Plaza, Columbus, Ohio 43215. A copy of Transource Missouri's certificate from the Missouri Secretary of State authorizing it to do business in Missouri was filed in File No. EA-2013-0098.

2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Todd Fridley Vice President, Transource Missouri, LLC 1200 Main Street, 15<sup>th</sup> Floor Kansas City, Missouri 64105 Phone: (816) 654-1811 Fax: (816) 556-2787 E-mail: todd.fridley@kcpl.com

3. Transource interests differ from those of the general public. Although Transource does not currently know what position it will take in this case, the interests of Transource will be directly affected and could be adversely affected by a final order issued in this case because the

proposed line will cross Transource's Sibley to Nebraska City 345 kV transmission line. Transource should therefore be allowed to fully participate in this case so that it can protect its interests.

4. Good cause exists for allowing the intervention of Transource at this time since it will be able to provide the Commission with the perspective of another transmission-related company, and it will afford Transource an opportunity to provide useful and relevant information that may aid the Commission it in its deliberations. Transource respectfully submits that good cause also exists for filing this application after the intervention date established by the Commission due to the delay in retaining counsel to represent it in this matter. Pursuant to 4 CSR 240-2.070(1), Transource accepts the record established in this case, including the requirements of any orders of the Commission, as of the date this motion is filed. At this point, no procedural schedule has been established by the Commission, and no party will be prejudiced by the granting of this application at this time.

**WHEREFORE**, Transource respectfully requests that the Commission issue an order authorizing it to intervene out of time in the above-captioned matter.

Respectfully submitted,

## |s| James M. Fischer

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Attorneys for Transource Missouri, LLC

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been handdelivered, emailed or mailed, postage prepaid, to all counsel of record in this case this 2nd day of May, 2014.

<u>|s|James M. Fischer</u>

James M. Fischer