

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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)	Case No. EA-2014-0207
Current Transmission Line and an Associated Converter)	
Station Providing an interconnection on the Maywood-)	
Montgomery 345 kV Transmission Line)	

**RECOMMENDATION REGARDING
PROCEDURE TO ADDRESS INFORMATION
FILED BY GRAIN BELT EXPRESS CLEAN LINE LLC**

Grain Belt Express Clean Line LLC (“Grain Belt Express” or “Company”) provides the following recommendation in response to the Commission’s April 16, 2015 Order Directing Filing of Recommendations for Supplemental Procedural Schedule:

1. Grain Belt Express believes that all parties to this proceeding should have an opportunity to address and comment upon the Response to Order Directing Filing of Additional Information (“Response”), as well as the supplemental exhibits attached thereto (“Supplemental Exhibits”), that the Company submitted to the Commission on April 13, 2015. That opportunity has been provided by the Commission in its February 11, 2015 Order Directing Filing of Additional Information, which stated that responses by any party to the additional information filed by Grain Belt Express “shall be filed no later than thirty days after the additional information is filed in EFIS.” Such responses are due on May 13, 2015.

2. To permit meaningful responses, the Company transmitted the workpapers supporting its April 13 Response to Staff, as it requested, on April 16. Grain Belt Express advised all other parties that if they wished to receive copies of those workpapers, to advise counsel for the Company. To date, the Company has provided workpapers in response to the requests it has received.

3. As the Commission stated on March 11, 2015 in its Order Denying Motions for Reconsideration filed by certain parties who objected to its February 11 Order, the Commission may require the production of further evidence upon any issue under 4 CSR 240-2.130(16). That provision provides that “[t]he presiding officer may require the production of further evidence upon any issue. The presiding officer may authorize the filing of specific evidence as part of the record within a fixed time after submission” 4 CSR 240-2.130(16). Moreover, the Commission is well within its power to admit post-hearing exhibits into the record, pursuant to 4 CSR 240-2.130(17).

4. Given that the Commission’s February 11 Order Directing Filing of Additional Information asked for the filing of specific evidence that simply clarified or expanded upon the testimony and evidence already admitted into the record by the Commission, there is no need for any further round of testimony. The supplemental procedure requested by the Commission is to address simply these post-hearing exhibits, the filing of which does not re-open the record and initiate a second round of proceedings.

5. As long as all parties have an opportunity to state a position with regard to the Company’s Response and Supplemental Exhibits, the Commission’s actions are appropriate and consistent with due process. Accordingly, Grain Belt Express recommends that the responses by any party to its Response and Supplemental Exhibits (which the Commission ordered to be filed by May 13, 2015) include any additional briefing by the parties submitting responses.

6. Once Staff or other parties have filed their May 13 responses, Grain Belt Express and any other party should have the opportunity to comment or reply. The Company recommends that such responses be submitted by May 22, 2015.

7. To the extent that the Commission and other parties to the case would like an opportunity to ask questions regarding the Company's April 13 Response and its Supplemental Exhibits, Grain Belt Express has no objection to producing David Berry of Clean Line Energy Partners LLC, Robert Cleveland of Leidos Engineering, LLC, and Judy Chang of The Brattle Group, Inc. at a hearing in Jefferson City within the next 45 days.

8. The Commission's supplemental procedure should be scheduled with consideration given to the time that has already elapsed in this case. The Company filed its Application for a Certificate of Convenience and Necessity on March 26, 2014, over 12 months ago. Staff and other parties conducted extensive discovery regarding the Company's Application, testimony, and schedules. The Commission held eight local public hearings, which occurred on August 12 and 14, and September 3 and 4. Three rounds of pre-filed testimony occurred, and the Commission conducted five days of evidentiary hearings (November 10, November 12-14, and November 21).

9. If these recommendations are accepted, the Commission then will have all the necessary facts and arguments before it to evaluate the Company's Response and Supplemental Exhibits.

10. Grain Belt Express is aware that other parties and the Commission's Staff have filed recommendations in response to the Commission's April 16, 2015 Order Directing Filing of Recommendations for Supplemental Procedural Schedule, to which the Company intends to reply by Friday, April 24, 2014.

WHEREFORE, Grain Belt Express Clean Line LLC provides this response to the Commission's Order Directing Filing of Recommendations for Supplemental Procedural Schedule of April 16, 2015.

/s/ Karl Zobrist

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ATTORNEYS FOR GRAIN BELT EXPRESS
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid, this 22nd day of April 2015.

/s/ Karl Zobrist

Attorney for Grain Belt Express Clean Line LLC