

**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 Current Transmission Line)
and an Associated Converter Station)
Providing an Interconnection on the)
Maywood-Montgomery 345kV transmission)
line.)**

Case No. EA-2016-0358

**RESPONSE OF DONALD LOWENSTEIN TO
FIRST SET OF DATA REQUESTS FROM
GRAIN BELT EXPRESS**

Data Request No. 1.

On page 5, line 2 of your rebuttal testimony you discuss the number of individual and business members of MLA. Please provide a list of these individual and business members as well as the membership agreement for each.

RESPONSE: The MLA stands on the objections previously submitted.

Data Request No. 2.

On page 6, lines of your rebuttal testimony you discuss the contributions made by members of MLA and the internal controls for safekeeping of those funds. Please provide a list of contributions by member and total collected to-date for MLA.

RESPONSE: Total - \$158,957. As to contributions by each member, the MLA stands on the objections previously submitted.

Data Request No. 3.

Therefore, since nobody knows today the future value of GBE (or whoever ends up owning this project), we can correctly assume all of the tax benefit discussion is based solely upon the cost to build, which translates only to the construction period and perhaps to the first year after the line is in operation.

Data Request No. 11. Please provide a numerical value for what you consider “substantial benefit”, “modest benefit” and “negligible benefit” as those terms are used on pg. 16, Line 11-14 of your rebuttal testimony.

RESPONSE: I prefer to look at percentages and ratios and scenarios.

A substantial benefit is a game changer. Using an Ambulance District as an example, if the increase in tax revenues enables them to buy a new ambulance or hire additional employees, I would consider that to be a substantial benefit in my mind. If the revenue increase helps them with routine maintenance costs on the ambulances, I would consider that to be more of a modest benefit. In the examples I used above, increases of \$924 or \$3,110 to an ambulance or fire protection district is immaterial and considered by me to be negligible.


Data Request No. 12.

To your knowledge do any of the existing agri-businesses mentioned in your rebuttal testimony on page 30, line 4-8 operate within a quarter mile or closer to an existing transmission line, railroads, highways, cell towers or other infrastructure asset? If yes, please describe.

RESPONSE: I assume most operate within a ¼ mile of an existing conventional power line except for the Amish businesses that don't use conventional electricity. I'm also sure there are many others that operate near street lights and near highways. Some probably do operate near a railroad. However, these are conventional infrastructure structures. The GBE project is not a conventional infrastructure asset and therefore should not be considered as similar to the

VERIFICATION OF RESPONSE

The answers provided to this set of data requests have been collected from a number of sources and are true and accurate to the best of my knowledge and belief.



Louis Donald Lowenstein

President, MLA

Date: 2-6-2017

[Back](#)