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Service Commission

Exhibit No. 103

Staff – Exhibit 103
Jordan T. Hull
Rebuttal Testimony
File No. EA-2023-0017

Exhibit No.:
Issue(s): *Qualified to
Operate/Maintain*
Witness: *Jordan T. Hull*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *EA-2023-0017*
Date Testimony Prepared: *April 19, 2023*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

JORDAN T. HULL

GRAIN BELT EXPRESS, LLC

CASE NO. EA-2023-0017

Jefferson City, Missouri
April 2023

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **JORDAN T. HULL**

4 **GRAIN BELT EXPRESS, LLC**

5 **CASE NO. EA-2023-0017**

6 Q. Please state your name and business address.

7 A. My name is Jordan T. Hull, and my business address is Missouri Public Service
8 Commission; 200 Madison Street, PO Box 360, Jefferson City, MO 65102.

9 Q. By whom are you employed and in what capacity?

10 A. I am employed by the Missouri Public Service Commission as an Associate Engineer
11 in the Energy Resources Department in the Industry Analysis Division.

12 Q. Please describe your educational and work background.

13 A. Please See Schedule JTH-r1.

14 Q. What is the purpose of your testimony?

15 A. The purpose of my rebuttal testimony is to discuss the application of Grain Belt
16 Express LLC (“Grain Belt”) in regards to providing more information to the Commission about
17 whether Invenergy LLC (“Invenergy”) is qualified to own, operate, maintain, and otherwise control
18 and manage the project.

19 Q.W ho is Invenergy?

20 A. Invenergy is a privately held, global developer and operator of sustainable energy
21 solutions.

22 Q. Who is Grain Belt?

23 A. Grain Belt Express LLC (Grain Belt) is owned by and is an affiliate of Invenergy.

24 Q. What do Invenergy’s projects generally consist of?

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Jordan T. Hull

1 A. Invenergy develops, owns, and operates large-scale renewable and other clean energy
2 generation and storage facilities worldwide. The home office is located in Chicago, IL with regional
3 development offices in North America, Latin America, Asia, and Europe. According to their website,
4 Invenergy has successfully completed 190 projects.

5 Q. How long has Invenergy been in business?

6 A. Invenergy has been in business since 2001.

7 Q. Has the Commission previously found that Grain Belt and Invenergy together have the
8 qualifications to develop, construct, and operate projects such as this one?

9 A. Yes, in the *Report and Order on Remand* (“Report and Order”) from Case No.
10 EA-2016-0358. The Report and Order stated that “Invenergy’s project management team has
11 extensive experience in construction of energy generation projects, contract negotiation, material
12 procurement, right-of-way issues, utility interconnections, and construction of electrical transmission
13 and substations.”¹ It went on to state that, “the Commission concludes that the substantial and competent
14 evidence in the record supports the conclusion that Grain Belt has met, by a preponderance of the
15 evidence, its burden of proof to demonstrate that it is qualified for a certificate of convenience and
16 necessity...”²

17 Q. Is Staff aware of any changes in qualifications from the previous case (EA-2016-0358)
18 that would make Staff question if Grain Belt and Invenergy are qualified to execute this project?

19 A. No

20 Q. Did staff review the testimony in this case?

21 A. Yes.

22 Q. Does it still appear that Grain Belt and Invenergy are capable of executing this project?

23 A. Yes. According to Invenergy’s website they have successfully developed 195 projects
24 along with 4,100 miles of transmission infrastructure successfully.

¹ Case No. EA-2016-0358, Report and Order on Remand, page 20.

² Case No. EA-2016-0358, Report and Order on Remand, page 50.

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1 Q. Who will provide vegetation control and maintenance for this project?

2 A. According to the direct testimony of Aaron White. “Engagement with local workforce
3 and material sourcing includes a range of services throughout development and construction and
4 includes but is not limited to land survey, environmental surveys, right-of-way acquisition, vegetation
5 clearing contractors, material procurement and construction labor.”³ Therefore, Grain Belt will be
6 responsible for making sure contractors maintain this project into the future.

7 Q. Are Grain Belt Express LLC and Invenergy qualified to execute the scope of
8 this project?

9 A. Yes, based on the Commission’s previously finding that Grain Belt and Invenergy are
10 competent and their ability to find contractors, Staff concludes Invenergy is qualified to construct and
11 install this project and Grain Belt Express LLC with the help of Invenergy is qualified to own, operate,
12 maintain, and otherwise control and manage the project.

13 Q. Does this conclude your rebuttal testimony?

14 A. Yes.

³ Case No. EA-2023-0017, Direct Testimony of Aaron White, pages 13-14.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Grain Belt)
Express LLC for an Amendment to its) Case No. EA-2023-0017
Certificate of Convenience and Necessity)
Authorizing it to Construct, Own, Operate,)
Control, Manage, and Maintain a High Voltage,)
Direct Current Transmission Line and)
Associated Converter Station)

AFFIDAVIT OF JORDAN T. HULL

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW JORDAN T. HULL and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Jordan T. Hull*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

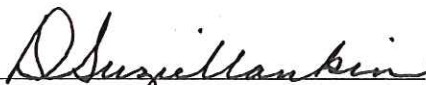


JORDAN T. HULL

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 17th day of April 2023.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public

Jordan T. Hull

CURRENT POSITION:

I am currently an Associate Engineer in the Energy Resources Department, Industry Analysis Division, of the Missouri Public Service Commission.

EDUCATIONAL BACKGROUND & WORK EXPERIENCE:

I received my Bachelor of Science Degree in Biological Engineering from the University of Missouri-Columbia in May of 2016. In June of 2016 I began employment with the Missouri Department of Natural Resources in the Air Pollution Control Program as an Environmental Engineer I. In June of 2017, I was promoted to an Environmental Engineer II within the Air Pollution Control Program. I began employment with the commission in November of 2018.

SUMMARY OF CASE INVOLVEMENT:

Case Number	Utility	Type	Issues
EO-2019-0067	KCP&L GMO	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0068	KCP&L	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0049	Liberty-Empire Electric Company	Integrated Resource Plan	Misc.
EO-2019-0132 & EO-2019-0133	KCP&L	MEEIA	Misc.
EO-2019-0257	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
ER-2019-0335	Ameren- Missouri	Rate Case	Heat Rates
ER-2019-0374	Liberty-Empire Electric Company	Rate Case	Heat Rates
EO-2020-0059	Liberty-Empire Electric Company	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2020-0262	EvergyWest	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment.

EO-2020-0263	Evergy Metro	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0021	Ameren- Missouri	Integrated Resource Plan	Misc.
EO-2021-0281	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0035	Evergy- Metro	Integrated Resource Plan	Misc.
EO-2021-0036	Evergy- West	Integrated Resource Plan	Misc.
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
ER-2021-0240	Ameren- Missouri	Rate Case	Heat Rate
ER-2021-0312	Liberty- Empire	Rate Case	Heat Rate
EO-2021-0331	Liberty Empire	Integrated Resource Plan	Misc.
EA-2022-0099	Ameren- Missouri	CCN	Qualified to construct
EO-2022-0337	Ameren- Missouri	Rate case	Heat Rate
EO-2022-0245	Ameren- Missouri	CCN	Qualified to construct
EO-2023-0087	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EA-2023-0017	Grain Belt Express LLC	CCN	Qualified to construct
EA-2023-0131	Liberty-Empire	CCN	TBA
EO-2023-0180	Ameren- Missouri	MEEIA Prudency Review	Demand Response
EO-2023-0136	Ameren- Missouri	MEEIA	Misc.