

**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

**STAFF RESPONSES TO
GRAIN BELT EXPRESS CLEAN LINE LLC'S
FIRST SET OF DATA REQUESTS DIRECTED TO
STAFF WITNESS KLIETHERMES**

For its First Set of Data Requests Directed to Staff of the Missouri Public Service Commission ("Staff"), Grain Belt Express Clean Line LLC ("Grain Belt Express" or "Company") states the following:

Definitions

1. The term "documents" includes all of the items listed in Missouri Rule of Civil Procedure 58.01(a)(1).
2. The term "Grain Belt Express Project" or "Project" means the transmission line and associated facilities described in Paragraph 14 of the Application in this proceeding.

Data Requests

- 1) In reference to page 39 of Staff's testimony where Ms. Kliethermes writes "...each converter station is in effect a new seam, not a resolution of an existing seam." Please provide any references to testimony or data request responses from any Grain Belt witness, including Ms. Kelly, asserting that the Grain Belt Project is resolving an existing seam.

STAFF RESPONSE: The “Application of Grain Belt Express Clean Line LLC for A Certificate of Convenience and Necessity”, verified by the affidavit of Michael P. Skelly, at page 22, states that “Suedeen Kelly: Ms. Kelly is a former Chair of the New Mexico Public Service Commission and a former FERC Commissioner. She explains why a participant-funded business model, like the Project, is a market-driven solution to transmission expansion. She reviews the facts demonstrating that there is a need for the Project, why it is economically feasible and in the public interest, and discusses why the Project fulfills the goals of FERC Order 1000 that encourages interregional transmission projects and the resolution of inter-RTO seams issues.”

Staff does not allege that Ms. Kelly asserts that the Grain Belt Project is resolving an existing seam. Staff indicates that Ms. Kelly’s testimony is unproductively confusing on introducing the concepts of (1) “a limited number of transmission connections across a seam boundary” and (2) Missouri’s investigation *In the Matter of an Investigation Into the Possible Methods Mitigating Identified Harmful Effects of Entergy Joining MISO on non-MISO Missouri Utilities and Their Ratepayers and Maximizing the Benefits For Missouri Utilities and Ratepayers Along RTO and Cooperative Seams*, File No. EW-2014-0156, as apparently intended as factual support for her conclusions at page 32 that “The Project’s participant-funded business model protects Missouri’s captive electric customers from the costs and risks inherent in traditional, rate-based transmission;” and “The Project meets the clear need for interregional transmission—and provides the multiple benefits of interregional transmission--while avoiding the contentious and problematic cost allocation processes across multiple RTOs;” See testimony at Page 15 – 16, Ms. Kelly stating:

14 Q. What happens at the boundaries between regions?

15 A. When the boundary of one regional transmission system abuts the boundary of another
16 regional transmission system, this is called a “seam.” Because there are usually a limited
17 number of transmission connections across a seam boundary, regional seams can create
18 congestion, limit the efficient use of electric infrastructure near the seam boundary, and cut
19 off LSEs from cost-effective generation resources, even those located geographically
20 nearby, but on the other side of the seam. Additionally, transmitting energy across seams
21 usually results in additive transmission costs, i.e. rate pancaking, where the transmission
1 customer pays the postage stamp rate for both regions. As the Commission is aware, the
2 presence of multiple transmission seams within Missouri has resulted in increased costs to
3 consumers.³²

³² See e.g., *In the Matter of an Investigation Into the Possible Methods Mitigating Identified Harmful Effects of Entergy Joining MISO on non-MISO Missouri Utilities and Their Ratepayers and Maximizing the Benefits For Missouri Utilities and Ratepayers Along RTO and Cooperative Seams*, File No. EW-2014-0156, Order Opening a Case to Investigate Methods of Eliminating or Mitigating the Negative Effects of the MISO/SPP Seam (Mo. P.S.C. Nov. 26, 2013).

Response provided by Staff Witness Sarah Lliethermes.

2) In reference to page 39 of Staff’s testimony where Ms. Kliethermes writes “...each converter station is a discrete source or sink, and it is Staff’s understanding that Grain Belt will restrict the free flow of energy through each converter station.”

a. Please provide as many references to testimony or data request responses from any Grain Belt witness, including Ms. Kelly, describing the converter stations as discrete sources or sinks.

STAFF RESPONSE: This question is not grammatically sound and is confusing. Staff does not allege that Ms. Kelly generally acknowledges the converter stations as discreet sources or sinks. However, at one location, at pages 18 – 19, Ms. Kelly does acknowledge that “Direct current lines are particularly valuable during transmission outages, as converters control the flow of power over the line.”

Response Provided By Staff Witness Sarah Kliethermes.

~~b. Does Staff’s statement that each converter station is a “discrete source or sink” align with the discussion found Section V of the direct testimony of Grain Belt Express witness Dr. Galli, Coordination, Dispatch, and Operation of the Project, related to scheduling power: from SPP to MISO and/or PJM (page 31), from the MISO or PJM to SPP (page 31-32), and from MISO to SPP and/or PJM (page 32)?~~

b. Staff makes a statement that each converter station is a “discrete source or sink”. However, as discussed in Section V of the direct testimony of Grain Belt Express witness Dr. Galli, Coordination, Dispatch, and Operation of the Project, power can be scheduled from SPP to MISO and/or PJM (page 31), from the MISO or PJM to SPP (page 31-32), and from MISO to SPP and/or PJM (page 32) utilizing existing processes for request and procurement of transmission services for these interchange transactions. What does Staff mean by stating that each of the Project’s converter stations is a “discrete source or sink”?

STAFF RESPONSE: Staff is referencing the fact that a given converter station cannot physically operate to both uptake and inject energy from an AC power system at the same time or switch between uptake and injection without some form of operator input. Staff is not speaking as to whether a given converter station can be switched to perform either function.

Response Provided By Staff Witness Sarah Kliethermes.

c. Does Staff believe that loop flows, which are a result of “the free flow of energy” are desirable? If not, why not? If so, why?

STAFF RESPONSE: Staff does not believe that loop flows are “desirable” as a goal of system design. Staff does believe that loop flows are preferable to system failure due to thermal overload of the segment bypassed by the loop flow.

Response Provided By Staff Witness Sarah Kliethermes

d. Is it Staff’s understanding that the Grain Belt Project, which is utilizing HVDC technology – a completely controllable transmission solution – is capable of being operated in a manner that allows the “free flow of energy”? If so,

STAFF RESPONSE: No.

Response provided by Staff Witness Sarah Kliethermes.

i. How would operation of the Project to allow the “free flow of energy” be accomplished?

ii. Would the Project be able to remain a merchant project? If so, how would the Project determine who the shippers are that are utilizing the Project?

e. Does Staff believe that a transmission solution that allows the “free flow of energy” provides greater reliability benefits than one that can control exactly how much power is transmitted?

STAFF RESPONSE: Neither provides greater reliability benefits in the abstract. Staff’s use of this term was not with reference to reliability, but rather with reference to Mr. Skelly’s verified statement that Ms. Kelly’s testimony would discuss the Project’s fulfillment of “the resolution of inter-RTO seams issues” as stated in the Application he verified.

Response provided by Staff Witness Sarah Kliethermes.

- 3) With regard to page 39 of Staff’s testimony, please identify the specific reference in Ms. Kelly’s or any other Grain Belt witness’s testimony and/or data request responses which states that the Grain Belt Project will “address the Missouri-specific seams issues concerning potentially uncompensated flows...”.

STAFF RESPONSE: Staff indicates that Ms. Kelly’s testimony (at page 15 line 14 through page 16 line 3, including footnote 32) is unproductively confusing on introducing the concept of Missouri’s investigation *In the Matter of an Investigation Into the Possible Methods Mitigating Identified Harmful Effects of Entergy Joining MISO on non-MISO Missouri Utilities and Their Ratepayers and Maximizing the Benefits For Missouri Utilities and Ratepayers Along RTO and Cooperative Seams*, File No. EW-2014-0156, as apparently intended as factual support for her conclusions at page 32 that “The Project’s participant-funded business model protects Missouri’s captive electric customers from the costs and risks inherent in traditional, rate-based transmission;” and “The Project meets the clear need for interregional transmission—and provides the multiple benefits of interregional transmission—while avoiding the contentious and problematic cost allocation processes across multiple RTOs;”

The “Application of Grain Belt Express Clean Line LLC for A Certificate of Convenience and Necessity”, verified by the affidavit of Michael P. Skelly, at page 22, states that “Suedeen Kelly: Ms. Kelly is a former Chair of the New Mexico Public Service Commission and a former FERC Commissioner. She explains why a participant-funded business model, like the Project, is a market-driven solution to transmission expansion. She reviews the facts demonstrating that there is a need for the Project, why it is economically feasible and in the public interest, and discusses why the Project fulfills the goals of FERC Order 1000 that encourages interregional transmission projects and the resolution of inter-RTO seams issues.”

See testimony at Page 15 – 16, Ms. Kelly stating:

14 Q. What happens at the boundaries between regions?

15 A. When the boundary of one regional transmission system abuts the boundary of another
16 regional transmission system, this is called a “seam.” Because there are usually a limited
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Mitigating the Negative Effects of the MISO/SPP Seam (Mo. P.S.C. Nov. 26, 2013).

Response provided by Staff Witness Sarah Kliethermes.

- 4) Please provide Staff's understanding of the in-service date of the most recent Extra High Voltage (i.e. voltage of 345 kV or higher) transmission line projects built from, into, or across Missouri between the following Transmission Providers:
- a. SPP and AECI
 - b. SPP and MISO
 - c. MISO and AECI
 - d. SPP and SWPA
 - e. MISO and SWPA
 - f. SWPA and AECI

STAFF RESPONSE: This is not information that is readily available to Staff.

Response provided by Staff Witness Sarah Kliethermes.

- 5) Does Staff believe that there's a need for construction of new transmission interconnections/facilities between Transmission Providers that operate in Missouri? If not, why not? If so, why?

STAFF RESPONSE: Staff does not have an opinion.

Response provided by Staff Witness Sarah Kliethermes.

- 6) Does Staff believe that construction of new transmission interconnections/facilities between Transmission Providers that operate in Missouri involves a straightforward, defined process and is working to the benefit of Missouri customers? Why or why not?

STAFF RESPONSE: Staff does not have an opinion.

Response provided by Staff Witness Sarah Kliethermes.

- 7) On page 40 of Staff’s testimony, Ms. Kliethermes states “These additional seams and the discrete interconnection of the Project exacerbates the issues...”. What is meant by “the issues”? Specifically what issues are being referenced here?

STAFF RESPONSE: As stated at page 40, “the issues” refers to “the issues that Ms. Kelly appears to imply the Project would help to resolve at page 18 of her direct testimony, where she states; ‘The ability of interregional transmission to import power from outside of a region also provides reliability benefits. In times of generation scarcity within a region, excess resources from another region can be imported using the interregional line. The availability of resources from outside a given region can also reduce the reserve margin necessary to ensure reliability for the region. Lowered reserve margins decrease consumer costs in the region, as ratepayers no longer have to support extra resources within the region.’”

Response provided by Staff Witness Sarah Kliethermes.

- 8) On page 40 of Staff’s testimony there is an excerpt from Ms. Kelly’s testimony. Please identify where within this excerpt, or otherwise within Ms. Kelly’s testimony, Ms. Kelly implies resolution of something that she also identifies as needing to be resolved.

STAFF RESPONSE: The “Application of Grain Belt Express Clean Line LLC for A Certificate of Convenience and Necessity”, verified by the affidavit of Michael P. Skelly, at page 22, states that “Suedeen Kelly: Ms. Kelly is a former Chair of the New Mexico Public Service Commission and a former FERC Commissioner. She explains why a participant-funded business model, like the Project, is a market-driven solution to transmission expansion. She reviews the facts demonstrating that there is a need for the Project, why it is economically feasible and in the public interest, and discusses why the Project fulfills the goals of FERC Order 1000 that encourages interregional transmission projects and **the resolution of inter-RTO seams issues.**” [emphasis added]

Response provided by Staff Witness Sarah Kliethermes.

- 9) In reference to page 40 of Staff’s testimony where Ms. Kliethermes states that “To the extent that contingency planning for the region would need to account for the sudden failure of a 500MW generator, this would increase reserve margin requirements to preserve existing reliability.”
- a. Please identify “the region” as it is referred to in this statement. Is “the region” a local resource zone within MISO?

STAFF RESPONSE: Staff’s use of “the region” is intentionally vague as Staff is uncertain what “the region” is intended to mean in the language quoted from Ms. Kelly, which is referenced.

Response provided by Staff Witness Sarah Kliethermes.

b. Please identify what is meant by “contingency planning” as it is referred to in this statement.

STAFF RESPONSE: Staff’s use of “contingency planning” is intentionally vague as Staff is uncertain what exact scenario or set of scenarios is intended to be described in the language quoted from Ms. Kelly, which is referenced.

Response provided by Staff Witness Sarah Kliethermes.

c. Please identify what is meant by “reserve margin requirements” as it is referred to in this statement.

STAFF RESPONSE: Staff’s use of “reserve margin requirement” is intentionally vague as Staff is uncertain what “lowered reserve margins” are intended to be described in the language quoted from Ms. Kelly, which is referenced

Response provided by Staff Witness Sarah Kliethermes.

d. Please identify the specific reliability planning criteria, processes, and procedures that are applicable to “the region” which Staff relief upon for their assertion that an increase to “reserve margin requirements” would occur if contingency planning was required to consider the injection from the Missouri converter station.

STAFF RESPONSE: See responses to parts a, b, c, above

Staff Response Provided by Staff Witness Sarah Kliethermes.

e. Please provide the study results performed for or by Staff where the 500MW injection from the Missouri converter station has been considered and resulted in an increase in the reserve margin requirements for “the region”.

STAFF RESPONSE: Staff has not stated or alleged that the 500MW injection from the Missouri converter station has any impact to increase or

decrease the reserve margin requirements for “the region” as described by Ms. Kelly.

Response Provided by Staff Witness Sarah Kliethermes.

f. Please provide the calculations relied upon for the assertion that considering the 500MW injection from the Missouri converter station will result in an increase in the reserve margin requirements for “the region”.

STAFF RESPONSE: Staff has not stated or alleged that the 500MW injection from the Missouri converter station has any impact to increase or decrease the reserve margin requirements for “the region” as described by Ms. Kelly.

Response Provided by Staff Witness Sarah Kliethermes.

g. Is Staff aware of any Missouri-located generating units that are exempt from being considered in transmission planning analyses performed by any of the Transmission Providers in the State of Missouri? If so, please list those units.

STAFF RESPONSE: Staff does not have an opinion.

Response Provided by Staff Witness Sarah Kliethermes.

h. Please provide Staff’s opinion or knowledge, in general (e.g. as a percentage of nameplate), on the amount of capacity (as opposed to energy) that is attributable to wind plants located within the State of Missouri which contribute to meeting reserve margin requirements for “the region”.

STAFF RESPONSE: See response to parts a, above.

Response Provided by Staff Witness Sarah Kliethermes.

i. How would a planning authority consider the outage of a Missouri-located wind plant within “contingency planning” in the determination of impacts to “reserve margin requirements”?

STAFF RESPONSE: See responses to parts b and c, above.

Response Provided by Staff Witness Sarah Kliethermes.

j. How would a planning authority consider the outage of a fossil-fueled generator within “contingency planning” in the determination of impacts to “reserve margin requirements”?

STAFF RESPONSE: See responses to parts b and c, above.

Response Provided by Staff Witness Sarah Kliethermes.

k. What is the largest generating unit within “the region” as it is defined in response to part a)?

STAFF RESPONSE: See response to parts a, above.

Response Provided by Staff Witness Sarah Kliethermes.

l. Would introduction of a generating unit of a smaller nameplate capacity than that which was identified in response to part k increase the reserve margin requirements as defined in part c)?

STAFF RESPONSE: See response to parts a, above.

Response provided by Staff Witness Sarah Kliethermes.

10) Please provide the reference(s) within Ms. Kelly’s testimony that indicates that the Grain Belt Project is being studied by the relevant RTOs as a generator.

STAFF RESPONSE: As stated at page 40 of the Staff Report “...Ms. Kelly does not indicate that MISO is studying the Project as a generator...” Specifically, at pages 28-29, Ms. Kelly testifies, “The Project will go through the relevant interconnection study processes to determine whether it can be reliably interconnected to the transmission grid.” Staff suggests that this is needlessly confusing and would benefit from inclusion of the word “generator” between the words “relevant” and “interconnection”.

Response provided by Staff Witness Sarah Kliethermes.

11) Please provide the reference(s) within Ms. Kelly’s testimony that indicates that the Grain

Belt Project is being studied by the relevant RTOs as a transmission line.

STAFF RESPONSE: As stated at page 40 of the Staff Report “However, Ms. Kelly does not indicate that MISO is studying the Project as a generator, as opposed to studying it as a ‘transmission line.’” Specifically, at pages 28-29, Ms. Kelly testifies, “The Project will go through the relevant interconnection study processes to determine whether it can be reliably interconnected to the transmission grid.” Staff suggests that this is needlessly confusing and would benefit from inclusion of the word “generator” between the words “relevant” and “interconnection”. Absent reference to the word “generator” as constructed, this statement appears to imply that the interconnection study process is a study of transmission interconnection.

Response provided by Staff Witness Sarah Kliethermes.

- 12) In reference to page 40 of Staff’s testimony,
 - a. Please explain what is confusing about the “interconnection status of the Missouri converter station”.

STAFF RESPONSE: Staff is not stating that the interconnection status of the Missouri converter station is confusing. Staff is stating that Grain Belt’s testimony concerning the interconnection status is confusing, in that sections of Grain Belt’s testimony imply that the interconnection study process will study Grain Belt as a transmission line as opposed to as a generation interconnection.

Response provided by Staff Witness Sarah Kliethermes.

- b. Please clarify if the status of the interconnection requests is confusing. If so, what additional information will help address Staff’s confusion?

STAFF RESPONSE: The status of the interconnection requests is confusing only in the context of Grain Belt’s testimony.

Response provided by Staff Witness Sarah Kliethermes.

- c. Please clarify whether Staff is confused about the process of studying transactions to support energy transfers from MISO to PJM utilizing the Project in the manner described by Dr. Galli in the exchange excerpted on page 40-41 of Staff’s testimony.

STAFF RESPONSE: Staff is confused by Dr. Galli’s testimony to the extent that “any one can request” to initiate a process that has not yet been established. Staff is further confused by the interaction of Dr. Galli’s testimony quoted at page 40 of the Staff Report with Mr. Lawlor’s testimony quoted at page 40 of the Staff Report, as stated on page 40 of the Staff Report. Staff is further confused by the interaction of these quoted statements with the statement at page 7 of the Application verified by Mr. Skelly that “In addition, the Missouri converter station will have bi-directional functionality, allowing Missouri utilities the opportunity to sell up to 500 MW of excess power into the energy markets operated by PJM. The additional revenue from these off-system sales can be used to reduce the cost of electricity for the end-use customers of these Missouri utilities.”

Response Provided by Staff Witness Sarah Kliethermes.

- 13) Is Staff aware of a process for requesting transmission service from MISO for export of energy to Transmission Providers adjacent to MISO?

STAFF RESPONSE: Staff does not have an opinion as this question is presented in the abstract.

Transmission service is typically procured by other market participants, rather than a transmission provider, for the purpose of transmitting energy from a specified source to a specified load. For sources located outside a market participant’s RTO, the market participant can use point-to-point service, establish a contract path, or establish a pseudo-tie to move the energy from the source RTO to a border location at the participant’s RTO. From there, the market participant can use network integrated transmission service to transmit the energy to their load node.

Response Provided by Staff Witness Michael Stahlman

- 14) In the discussion with Staff in November 2016 referenced on page 41 of Staff’s testimony, Grain Belt highlighted the development of the HVDC interconnection process currently taking place among MISO stakeholders within the MISO Merchant HVDC Task Team (“MHTT”).

- a. Have any members of Staff been engaged in the MHTT? If not, why not?

STAFF RESPONSE: No. Staff does not have an opinion.

Response provided by Staff Witness Sarah Kliethermes.

b. In reference to Staff’s testimony at page 41 where Ms. Kliethermes states that “the process to establish a process has not yet been established”, is this statement regarding a process to study energy withdrawals from the MISO system via a HVDC project?

STAFF RESPONSE: No

Response Provided by Staff Witness Sarah Kliethermes.

c. If the answer to part b is “no”, please clarify what the “process” is for which Ms. Kliethermes asserts that a process has yet to be developed to establish.

STAFF RESPONSE: The process that does not which have a process developed to be established is the process of applying to MISO for study to convert AC MISO energy to DC energy for export from the MISO system.

Response Provided by Staff Witness Sarah Kliethermes.

d. If the answer to part b is “yes”, does Staff believe that the discussions and process materials that are part of the MHTT meetings do not constitute “a process to establish a process”? If not, please explain why Staff believes that a MISO stakeholder-driven task force with regular meetings to discuss the implementation of an interconnection process for a HVDC project, including provisions related to injection and withdrawal of energy, does not meet Staff’s expectations.

15) In reference to Staff testimony on page 41, what is meant by the statement “uploading Missouri energy”?

STAFF RESPONSE: Taking MISO AC energy into a DC converter station for conversion to DC and export out of MISO.

Response provided by Staff Witness Sarah Kliethermes.

16) A new transmission line has been constructed and placed in-service which interconnects Ameren Missouri to Associated Electric. The line was identified as needed in order to support power transfers primarily in the direction from Associated Electric to

Ameren Missouri.

a. If a MISO market participant desires to transmit energy from Ameren Missouri to Associated Electric, what study process, if any, would that market participant be required to utilize in order to obtain the right to effectuate transmission of energy as described?

STAFF RESPONSE: Staff does not have an opinion as this question is presented in the abstract

Response Provided by Staff Witness Sarah Kliethermes.

b. Please provide an explanation supporting the need to undergo study of the transfer described in a), if any.

c. Please describe why your response to a) could not apply to transfers from Ameren Missouri to PJM and provide any evidence that supports your position.

17) Is there a process available for transmission customers within MISO to procure transmission service to sink energy into PJM?

STAFF RESPONSE: This question is vague to the extent that it is unclear whether “procure transmission service” refers to a contractual or tariff-governed transaction or to the literal flow of energy. Staff takes no position on whether or not paying a through and out rate is a “process” within the meaning of this question, but Staff states that MISO does allow market participants to schedule both physical and financial export transactions.

Staff Response Provided by Staff Witness Sarah Kliethermes.

a. If not, does this mean that energy transfers from MISO to PJM cannot exist?

b. If so, what process would a MISO transmission customer go through?

STAFF RESPONSE: Staff takes no position on whether or not paying a through and out rate is a “process” within the meaning of this question, but Staff states that MISO does allow market participants to schedule both physical and financial export transactions.

Staff Response Provided by Staff Witness Sarah Kliethermes.

18) Considering the existing transmission topology of MISO and PJM (that is, without consideration of the Grain Belt Project), if a MISO transmission customer was able to procure transmission service from [source = Ameren Missouri] to [sink = PJM]...

a. Would that power get transmitted directly between Ameren Missouri and PJM or would that power need to be transmitted across intermediate and/or adjacent Transmission Owner transmission systems? Why?

STAFF RESPONSE: MISO does allow market participants to schedule both physical and financial export transactions. Staff cannot speculate on the specifics of any given transaction, including whether any energy actually left a given RTO.

Staff Response provided by Staff Witness Sarah Kliethermes.

c. In Staff's opinion, could there be loop flows (aka "uncompensated flows") that would occur as a result of this energy transfer?

STAFF RESPONSE: MISO does allow market participants to schedule both physical and financial export transactions. Staff cannot speculate on the specifics of any given transaction, including whether any energy actually left a given RTO.

Staff Response provided by Staff Witness Sarah Kliethermes.

19) Please clarify the final statement by Ms. Kliethermes on page 41 of Staff's testimony.

a. Specifically, please outline the "assertions" that are being referenced.

STAFF RESPONSE: See Staff Report from page 39 – 41, which specifies what assertions are referred to as "these assertion" and includes citations. See also Staff responses to questions 1, 2-2e, 3, 7, 8, 9-9I, 10, 11, 12-12c, and 15, provided above.

Staff Response provided by Staff Witness Sarah Kliethermes.

b. What are the assertions "internal" to?

STAFF RESPONSE: Grain Belt's direct testimony and Application.

Staff Response provided by Staff Witness Sarah Kliethermes.

c. What and with whom are the assertions conflicting against?

STAFF RESPONSE: See Staff Report from page 39 – 41, which specifies what assertions are referred to as “these assertion” and includes citations. See also Staff responses to questions 1, 2-2e, 3, 7, 8, 9-9l, 10, 11, 12-12c, and 15, provided above.

Response provided by Staff Witness Sarah Kliethermes.

/s/ Karl Zobrist

Karl Zobrist MBN 28325
Joshua K.T. Harden MBN 57941
Dentons US LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111
(816) 460-2400
karl.zobrist@dentons.com
joshua.hardens@dentons.com

Cary J. Kottler
General Counsel
Erin Szalkowski
Corporate Counsel
Clean Line Energy Partners LLC
1001 McKinney Street, Suite 700
Houston, TX 77002 (832) 319-
6320
ckottler@cleanlineenergy.com

eszalkowski@cleanlineenergy.com

Attorneys for Grain Belt Express Clean Line
LLC

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Data Request was served upon the party to which it was directed by email or U.S. Mail, postage prepaid, this ___3rd___ day of February, 2017.

/s/ Karl Zobrist

Karl Zobrist MBN 28325

Joshua K.T. Harden MBN 57941

Dentons US LLP

4520 Main Street, Suite 1100

Kansas City, MO 64111

(816) 460-2400

karl.zobrist@dentons.com

joshua.hardens@dentons.com

Cary J. Kottler

General Counsel

Erin Szalkowski

Corporate Counsel

Clean Line Energy Partners LLC

1001 McKinney Street, Suite 700

Houston, TX 77002 (832) 319-

6320

ckottler@cleanlineenergy.com

eszalkowski@cleanlineenergy.com

Attorneys for Grain Belt Express

Clean Line LLC