

**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 Certificate)
of Convenience and Necessity Authorizing it to)
Construct, Own, Operate, Control, Manage, and) File No. EA-2023-0017
Maintain a High Voltage, Direct Current)
Transmission Line and Associated Converter)
Station)

APPLICATION TO INTERVENE OF ASSOCIATED INDUSTRIES OF MISSOURI

Pursuant to 20 CSR 4240-2.075, and the Missouri Public Service Commission’s September 1, 2022 *Order Directing Notice, Setting Intervention Deadline, Setting Time for Responses and Directing Filing*, Associated Industries of Missouri (“AIM”) hereby files this Application to Intervene and states the following:

1. AIM is a not-for-profit corporation organized and existing pursuant to the laws of the State of Missouri and is in good standing in all respects. AIM is a business association formed for the purpose of empowering its members through communication, education, and advocacy before legislative bodies, administrative agencies, courts, and the public. AIM currently represents the interests of approximately over 250 Missouri retail, professional, industrial and manufacturing businesses. These businesses are retail electric customers of Missouri utilities, including but not limited to Ameren and Evergy, and many are also retail electric customers in other states, including states which the project will cross and to which it may provide power transmission. All of AIM’s members may benefit from reduced electric rates resulting from the Grain Belt Express Project referenced in the Application filed by Grain Belt Express, LLC in this docket (“Amended Project”).

2. AIM is an “incorporated association” pursuant to 20 CSR 4240-2.075(4) and is requesting intervention in the name of the incorporated association.

3. As retail electric customers in Missouri, AIM-represented companies will pay electric rates affected by the Amended Project’s impacts to the energy economy in Missouri and costs passed to customers from utilities that may purchase energy from the Amended Project. Given that AIM-represented businesses use a large amount of power, in the multiple mega-watt hours in Missouri every year, the Amended Project will have a substantial effect on these businesses’ energy costs and therefore AIM has a particular interest in participating in this matter.

4. Granting AIM’s invention will serve the public interest by contributing to the Commission’s record for decision in this case as to how the Amended Project may affect Missouri customers, and no party will be adversely affected by such intervention. Accordingly, AIM meets the standards for intervention pursuant to 20 CSR 4240-2.075(3).

5. Should the Commission grant this Application, notices and other correspondence in this case should be directed to the undersigned counsel.

WHEREFORE, Associated Industries of Missouri prays that this Commission grant its Application to Intervene.

Respectfully submitted,

ELLINGER AND ASSOCIATES, LLC

/s/ Marc H. Ellinger

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ATTORNEYS FOR ASSOCIATED INDUSTRIES OF
MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon the parties listed on the official service list by email, this 30th day of September, 2022.

/s/ Marc H. Ellinger