

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

**INITIAL BRIEF OF INTERVENOR
ASSOCIATED INDUSTRIES OF MISSOURI**

Associated Industries of Missouri (“AIM”) is the oldest business organization in the State of Missouri. It was founded and continues to work for the benefit of its members and all business and industry in the State of Missouri. Economic growth and expansion in Missouri is dependent upon a number of varied factors; but in today’s modern world reliable and accessible electricity has become critical. To that end, AIM supports the expansion of transmission infrastructure in Missouri to all current businesses to have dependable power for current operations and for expansion and for new businesses to have the power to locate in Missouri and grow our economy.

The proposed amendments to the Certificate of Convenience and Necessity (“CCN”) held by Grain Belt Express LLC (“Grain Belt Express”) are not just beneficial for Missouri and businesses in Missouri but are necessary for the long-term economic health of Missouri.

In the course of the above-captioned case, there are now only three issues still in dispute. The record reflects that each issue should be ruled in favor of Grain Belt Express and the proposed project should go forward.

While there are three issues presented by agreement of the parties at hearing, AIM focuses on Issue 1 in this Initial Brief.

ISSUE 1

Does the evidence establish that the following amendments to the Certificate of Convenience and Necessity (“CCN”) held by Grain Belt Express LLC (“Grain Belt Express”) are “necessary or convenient for the public service” within the meaning of that phrase under section 393.170, RSMo:

- a. Relocating the Missouri converter station from Ralls County to Monroe County and increasing the capacity of the Missouri converter station from 500 MW to 2500 MW.
- b. Relocating the AC connector line (the “Tiger Connector”) from Ralls County to Monroe, Audrain, and Callaway Counties.
- c. Constructing the Project in two phases.
 - i. If the Commission determines that constructing the project in two phases is “necessary or convenient for the public service,” should the Commission approve a modification to the “Financing Conditions,” as set forth in Section I of Exhibit 1 to the Report & Order on Remand in Case No. EA-2016-0358, to allow for constructing the Project in two phases?

Position of AIM

The evidence supports each of the amendments to the CCN currently held by Grain Belt Express and such amendments are in the best interest of the public and necessary and convenient for the public service. The Commission should approve the amendments.

Discussion

The Commission set a five-part test to evaluate such applications.¹ AIM focuses on the fifth factor: “The service must promote the public interest.”²

¹ *In re Tartan Energy*, 3 Mo.P.S.C.3d 173, Case No. GA-94-127, 1994 WL 762882, 1994 Mo. PSC LEXIS 26 (September 16, 1994).

² *Id.*

Based upon the testimony and evidence this part has easily been bet by Grain Belt Energy.

The testimony in this matter reflects that the proposed amendments to the CCN will inure to the benefit of Missouri and should be approved. The moving of the converter station, the construction of the Tiger Connector and the phasing of such construction benefits Missouri consumers, including Missouri businesses, because it allows a larger amount of energy to come to Missouri customers since Phase I as proposed would result in the transmission line running from Kansas to Missouri (as opposed to the existing CCN which runs across Missouri through Illinois to Indiana). Furthermore, the energy available to the grid in Missouri would be much larger than under the existing, unamended CCN.³ Additionally, Phase II would likely have no Missouri customers (albeit allowing an interconnection to PJM.)⁴ Finally, the construction in phases allows for Missouri consumers to access that power more quickly than waiting for construction in other states (e.g., Illinois and Indiana) for the line to become operational making the Phase I benefits primarily to Missouri customers.⁵

Testimony further demonstrated that there are a large number of major businesses located in Missouri or considering moving to Missouri which would be prospective customers.⁶ The phasing of the power line construction and the other proposed amendments will allow those businesses to access such power and would facilitate economic development in Missouri.⁷

The benefits to Missouri and to our economy overwhelmingly support the

³ Direct Testimony of Shashank Sane, p. 10. and Tr. 284:9-15

⁴ Tr. 287:13-17.

⁵ Surrebuttal of Kevin Chandler, pp. 7–8.

⁶ Direct Testimony of Shashank Sane, p. 15, Tr. 278:3-7 and Tr.278:25-279:5.

⁷ Tr. 789:2-19 and Tr. 790:3-8

approval of the Amendment to the CCN.

Conclusion

The proposed amendments to the CCN inure the benefit of all Missouri electricity consumers. Missouri businesses, many of whom are members of AIM, will also see significant benefits from the approval of the amendments to the CCN as proposed by Grain Belt Energy in this case. Those benefits serve to insure the existing vitality of Missouri's economy and to foster economic growth and development in the future.

Economic growth and development is an important, perhaps the most important, mission of state government. Without a vibrant economy, Missouri would slowly watch its population flee, its cities atrophy and die, and ultimately become a failed state. Approval of forward-looking projects, such as the Tiger Connector, will ensure that Missouri will be able to grow and thrive. On this basis, and as noted above, approval of the amendments to the CCN are in the best interests of the citizens and businesses of the State of Missouri and serve is necessary and convenient for the public service. The *Tartarun* factors, especially the fifth factor, have been met.

The Commission should approve the amendments to the CCN, modify the compensation package to landowners, and not add any additional conditions to such approvals.

Respectfully submitted,

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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 7th day of July 2023.

/s/ Marc H. Ellinger