

Comments of Clean Line Energy Partners LLC ("Clean Line")

Re: EX-2015-0225, Proposed Amendment to 4 CSR 240-3.105

Clean Line seeks clarification of the intended purpose and scope of the proposed amendment to 4 CSR 240-3.105.

The proposed amendment refers to assets which "facilitate the operation of electric generating plants in Missouri." See 4 CSR 240-3.105(1)(B), 4 CSR 240-3.105(2)(B). In other places the proposed amendment refers simply to "facilitat[ing] the operation of the electric generating plant(s)" without the Missouri qualifier. See 4 CSR 240.240-3.105(B)(3)-(6).

Within the context of natural gas pipelines, the "facilitating ... generating plants" language draws a clear distinction between natural gas pipelines which are planned and constructed to facilitate electric generating plants and those that are not. However, this distinction is not as clear with electric transmission lines. This is because all transmission assets "facilitate" to some degree the operation of electric generation plants by transmitting their output. If the proposed rule is intended to be limited to transmission lines that are specifically designed to facilitate the operation of a particular generating plant, this proposed language should be clarified.

4 CSR 240.3-105(3) needs to be clarified as to the impact on the Commission's authority to grant a CCN on a conditional basis pending county consents and the legal authority granted to the CCN applicant under a conditional CCN pending county consents.