

**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) Case No. EA-2014-0207
Current Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

IBEW UNIONS' STATEMENT OF POSITION

COME NOW, IBEW Local Union 2, IBEW Local Union 53 and IBEW Local Union 1439 (collectively, the "IBEW Unions"), through counsel, and for their Statement of Position as to the List of Issues for the above-reference matter state as follows:

LIST OF ISSUES

- 1. Does the evidence establish that the high-voltage direct current transmission line and converter station for which Grain Belt Express Clean Line LLC ("Grain Belt Express") is seeking a certificate of convenience and necessity ("CCN") are necessary or convenient for public service?***

Yes. The IBEW Unions deal with electricity and the demand for inexpensive, ecological energy on a daily basis. The IBEW Unions see the proposed high-voltage direct current transmission line and converter station as a necessary addition to the current energy sources in the Midwest. The Grain Belt Express plan also appears to be a convenient method of establishing a high-voltage direct current transmission line and converter station because it ties in with existing infrastructure. Accordingly, Grain Belt Express should be granted the CCN it seeks.

- 2. If the commission grants the CCN, what conditions, if any, should the Commission impose?***

The IBEW Unions take no position as to what conditions the Commission should impose on Grain Belt Express if the CCN is granted.

- 3. If the Commission grants the CCN, should the Commission exempt Grain Belt***

Express from complying with the reporting requirements of Commission rules 4 CSR 240-3.145, 4 CSR 240-3.135, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D)?

The IBEW Unions take no position as to a potential waiver of the reporting requirements.

WHEREFORE, the IBEW Unions respectfully submit the foregoing Statement of Position for the Commission's consideration.

Respectfully submitted,

/s/ Sherrie Hall
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Certificate of Service

I certify that a true and correct copy of the foregoing document was served the parties to this case by email or U.S. Mail, postage prepaid, this 7th day of November, 2014.

/s/ Sherrie Hall