

Exhibit No.:  
Issues: Environmental Impacts  
Witness: Shawn E. Lange  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Surrebuttal Testimony  
Case No.: EA-2014-0207  
Date Testimony Prepared: October 14, 2014

**MISSOURI PUBLIC SERVICE COMMISSION**

**REGULATORY REVIEW DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**SHAWN E. LANGE**

**GRAIN BELT EXPRESS CLEAN LINE LLC**

**CASE NO. EA-2014-0207**

*Jefferson City, Missouri  
October 2014*



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**GRAIN BELT EXPRESS CLEAN LINE LLC**

**CASE NO. EA-2014-0207**

13 Q. Please state your name and business address.

14 A. My name is Shawn E. Lange and my business address is Missouri Public  
15 Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

16 Q. Are you the same Shawn Lange who filed rebuttal testimony in this case?

17 A. Yes.

18 **Overview**

19 Q. Have you reviewed the rebuttal testimonies of Michael Goggin, filed on behalf  
20 of Wind on the Wires and the Wind Coalition, and of Frank Costanza, filed on behalf of  
21 Tradewind Energy, Inc.?

22 A. Yes. I have reviewed these filed testimonies, among others.

23 **Response to Constanza and Goggins**

24 Q. Are you familiar with Mr. Constanza's assertion at pages 4-5 of his rebuttal  
25 testimony that "[t]he inherent flexibility of 111(d) allows each state to craft solutions best  
26 suited to its needs. Clearly, one alternative would make Great Plains wind plus gas fired  
27 generation a very likely solution to meet both air emissions goals, while delivering a very cost  
28 effective energy supply solution"?

A. Yes, I have reviewed Mr. Constanza's testimony regarding this assertion.

Surrebuttal Testimony of  
Shawn E. Lange

1 Q. Are you familiar with Mr. Goggins' claim at page 2 of his rebuttal testimony  
2 that "...the Project is needed to deliver low cost wind power to Missouri, and states in MISO  
3 and PJM so they can ... comply with the US EPA's Clean Power Plan rule (pursuant to  
4 section 111(d) of the Clean Air Act)...."?

5 A. Yes, I have reviewed Mr. Goggins' testimony regarding this claim.

6 Q. Do you agree with what Mr. Constanza and Mr. Goggins testify regarding  
7 wind and compliance with the US EPA's Clean Power Plan rule?

8 A. While it is true that the guidelines in the proposed EPA rule under section  
9 111(d) of the Clean Air Act allow for, and include, renewable energy as a "building block"  
10 for compliance, the amount and to what degree the Grain Belt Express project would help  
11 Missouri to comply with the guidelines will not be known until after the guidelines in the final  
12 EPA rule are issued in June 2015, the state compliance plan is developed, reviewed and  
13 accepted by the US EPA and Missouri state rules are promulgated by the Missouri  
14 Department of Natural Resources in June 2016, or later if extensions are requested and  
15 granted.

16 Q. Does this conclude your Surrebuttal Testimony?

17 A. Yes.