

**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 Current) File No. EA-2016-0358
Transmission Line and an Associated Converter)
Station Providing an Interconnection on the)
Maywood-Montgomery 345kV Transmission Line)

MISSOURI FARM BUREAU FEDERATION’S STATEMENT OF POSITIONS

COMES NOW the Missouri Farm Bureau Federation (“Missouri Farm Bureau”) and for its Statement of Positions in this case, states as follows:

POSITIONS

- 1. Does the evidence establish that the Commission may lawfully issue to Grain Belt Express Clean Line LLC ("Grain Belt") the certificate of convenience and necessity (“CCN”) it is seeking for the high-voltage direct current transmission line and converter station with an associated AC switching station and other AC interconnecting facilities?**

No. Missouri Farm Bureau’s position is that Grain Belt Express Clean Line LLC (“Grain Belt”) is a consortium of private investors. It is a business venture that does not merit certification by the Missouri Public Service Commission because it is a private business serving purely private interests. Neither its purpose nor potential benefits to Missouri citizens enumerated by Grain Belt justify the authorization to exercise eminent domain power. Moreover, the potential benefits are outweighed by the concerns expressed by many of Missouri Farm Bureau’s members along with hundreds of others

who participated in the Commission's local public hearings and submitted comments in opposition to the project.

Furthermore, under the provisions of RSMo. 229.100, Grain Belt is currently prohibited from any construction on the proposed project in Caldwell County, and may soon be prohibited from construction in Monroe County pending the outcome of litigation. As such, Grain Belt's application is moot because the Public Service Commission cannot issue a CCN to Grain Belt unless Grain Belt receives permission from all county commissions located on the project's proposed route.

- 2. Does the evidence establish that the high-voltage direct current transmission line and converter station for which Grain Belt is seeking a CCN are "necessary or convenient for the public service" within the meaning of that phrase in section 393.170, RSMo.?**

No. The evidence does not show that there is a legitimate need or demand for the few services that Grain Belt now proposes to provide within Missouri, and the Grain Belt project is therefore neither "necessary or convenient."

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

For the reason set out in its response to Issue 1 and 2 above, Missouri Farm Bureau does not believe that the Commission should grant a CCN to Grain Belt Express. However, if the Commission does grant a CCN, Missouri Farm Bureau believes that the

CCN should contain a condition prohibiting Grain Belt Express from exercising eminent domain for the project.

4. If the Commission grants the CCN, should the Commission exempt Grain Belt from complying with the reporting requirements of Commission rules 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D)?

At this point prior to the evidentiary hearing, Missouri Farm Bureau takes no position on this issue. However, Missouri Farm Bureau reserves the right to take a position after hearing and considering all of the evidence.

Respectfully submitted,

HADEN & HADEN LLC



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CERTIFICATE OF SERVICE

I hereby certify the copies of the foregoing have been e-mailed to all parties on the official service list for this case on this 13th day of March, 2017.



Brent E. Haden, Mo. Bar No. 54148