

**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-2016-0358  
Current Transmission Line and an Associated )  
Converter Station Providing an Interconnection on the )  
Maywood - Montgomery 345kV Transmission Line. )

**APPLICATION TO INTERVENE OF RENEW MISSOURI**

COMES NOW Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), pursuant to 4 CSR 240-2.075 and the Commission’s August 31, 2016 Order, and files its Application to Intervene in the above-styled case, and for its Application states as follows:

1. Renew Missouri is a project of Earth Island Institute, a not-for-profit corporation organized under the laws of California. Renew Missouri is a registered fictitious name of Earth Island Institute under Section 417.200, RSMo. Earth Island Institute has a Certificate of Authority for a Foreign Nonprofit granted by the Missouri Secretary of State.

2. As not-for-profit advocates for advancing renewable energy and energy efficiency policy in Missouri, Renew Missouri’s interests are different than those of the general public and may be adversely affected by a final order in this case.

3. Renew Missouri was instrumental in the passage of Proposition C, or Missouri’s Renewable Energy Standard (“RES,” § 393.1025-1030, RSMo.) in 2008, and continues to work to expand renewable energy in Missouri. Renew Missouri supports the proposal put forth in this case by Grain Belt Express Clean Line, LLC (“Clean Line”) in that it will lead to increasing the amount of renewable energy in various municipal utilities’ portfolios and potentially that of more utilities in the future. In addition, the expected cost of wind energy from Clean Line’s proposed project is likely cheaper than electricity from any other form of new generation today, and

presents the least-cost option for Missouri's investor-owned utilities to meet the requirements of the RES. Renew Missouri reserves the right to take further specific positions as this case proceeds.

4. Good cause exists to grant Renew Missouri intervention. Renew Missouri has a unique perspective that is not yet represented in this case. Granting Renew Missouri leave to intervene in this case will serve the public interest by assisting the Commission's record for decision in this case.

5. No party will be adversely affected by such intervention.

WHEREFORE, Renew Missouri requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully Submitted,

/s/

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ATTORNEY FOR EARTH ISLAND  
INSTITUTE d/b/a RENEW MISSOURI

#### CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 13<sup>th</sup> day of September, 2016.

/s/

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Andrew J Linhares, # 63973