

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 345 kV Transmission Line)

Motion for Intervention of the Missouri AFL-CIO

COMES NOW the Missouri AFL-CIO, affiliated with the American Federation of Labor and Congress of Industrial Organizations (“Missouri AFL-CIO”), by counsel, and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this motion, the Missouri AFL-CIO states:

1. The Missouri AFL-CIO is a democratic, voluntary federation of 36 labor unions along with additional labor councils and central labor councils that represent approximately 180,000 working people. The Missouri AFL-CIO is an unincorporated entity within the State of Missouri with its principal place of business located at 227 Jefferson St., Jefferson City, Missouri 65101.

2. Correspondence, communications, orders and the decision in this matter should be addressed to:

<p>MISSOURI AFL-CIO</p> <p>Michael Louis – President Jake Hummel – Secretary-Treasurer 227 Jefferson St., Jefferson City, Missouri 65101 Telephone: 573-634-2115</p>	<p>HARTNETT GLADNEY HETTERMAN, L.L.C.</p> <p>JAMES P. FAUL 4399 Laclede Avenue St. Louis, MO 63108 Telephone: 314-531-1054 Facsimile: 314-531-1131 jfaul@hghllc.net</p>
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3. As the representatives of its members, including public education employees, firefighters, police officers, and other public sector workers, construction workers, and thousands of families who are energy consumers, the Missouri AFL-CIO has interests in this proceeding which are clearly different than the general public, and any other party. This project benefits our schools and our public institutions and their union members through anticipated property tax revenues, it is expected to support hundreds of jobs during the three-year construction phase, and it is expected to reduce energy bills by millions of dollars for Missouri's energy consumers.

4. Intervention by the Missouri AFL-CIO is a sensible and practicable means for a large number of public education employees, public sector workers, construction workers, and energy consumers to be given a voice in a proceeding in which they have a vital interest.

5. No other party in this proceeding can adequately represent the interests of Missouri AFL-CIO and its members, and Missouri AFL-CIO asserts that its participation in this case could be valuable to the Commission's decision making process in this matter.

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Wherefore, Missouri AFL-CIO respectfully asks the Commission to grant this Motion, thereby permitting Missouri AFL-CIO to intervene in this proceeding.

Respectfully Submitted

HARTNETT GLADNEY
HETTERMAN, L.L.C.

/s/ James P. Faul

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Attorneys for Missouri AFL-CIO

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served upon the parties to this proceeding by email or U.S. Mail, postage prepaid, this 13th day of September 2016

Respectfully Submitted

HARTNETT GLADNEY
HETTERMAN, L.L.C.

/s/ James P. Faul

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