

**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 ) File No. EA-2014-0207  
Current Transmission Line and an Associated )  
converter Station Providing an Interconnection on the )  
Maywood-Montgomery 245 kV Transmission Line. )

**MOTION TO CORRECT TESTIMONY**

Infinity Wind Power (Infinity), by and through counsel, hereby moves the Missouri Public Service Commission (Commission) to allow Infinity to amend the pre-filed cross-surrebuttal testimony of Infinity witness Mr. Matt Langley, stating:

1. Through the course of discovery, Infinity was served with data requests related to a specific sentence contained in the cross-surrebuttal of Mr. Langley. The parties were unable to reach an agreement as to the appropriateness of disclosure of the requested data. In compromise, Infinity agrees to strike the related sentence from the testimony of Mr. Langley.

2. Infinity has attached a red-lined and clean version of page 2 of Mr. Langley's cross-surrebuttal testimony. The clean version has been formatted to keep intact the pagination of the remaining pages of Mr. Langley's testimony.

WHEREFORE, Infinity respectfully requests the Commission accept the amended page two (2) of the cross-surrebuttal testimony of Mr. Langley.

Respectfully submitted,

*/s/ Terri Pemberton*

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**ATTORNEYS FOR INFINITY WIND POWER**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon the parties to this proceeding by email this 7<sup>th</sup> day of November 2014.

*/s/ Terri Pemberton*

Terri Pemberton

Attorney for Infinity Wind Power

1           **capacity factor for Kansas wind and his use of a 50% capacity factor for potential**  
2           **projects connecting to the Grain Belt Express project in 2018?**

3    A.    I disagree that a 45% or even 50% capacity factor for wind projects in Kansas is an  
4           appropriate figure when discussing projects that will be built in conjunction with the  
5           Grain Belt Express Project in 2018. The capacity factor on wind projects is an ever  
6           changing statistic, and is particularly dependent on turbine technology. Compared to  
7           fossil generation, wind energy technology is still relatively young, and the gains that are  
8           being made in the technology are significant, so what we see today in terms of capacity  
9           factors will most certainly differ in the future as technology continues to advance. ~~For~~  
10          ~~example, while I cannot share specific project details because of confidentiality issues, I~~  
11          ~~can say that net capacity factors have improved by an average of about 10% across~~  
12          ~~Infinity's wind projects between 2012 and today.~~ Given the competitive nature of this  
13          industry, we would expect to see continued improvements over the next four years. Even  
14          if the capacity factors improved at a slower rate than the last two years, we would still  
15          expect to see capacity factors above 50%, for even the lowest performing turbines in the  
16          market. In fact, with the leading technology of today on the most competitive sites, the  
17          industry is easily able to achieve capacity factors above 50%, and in many locations even  
18          above that. To illustrate this point, I've attached as **Exhibit ML-1**, information from a  
19          recent filing made by Southwestern Public Service Company (SPS) in support of a  
20          Purchase Power Agreement approval matter that was before the New Mexico Public  
21          Regulatory Commission. Specifically, Exhibit ML-1 is attachment BFW-2 from the  
22          testimony of Bennie F. Weeks of SPS, consisting of a table from all of the bids SPS

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