

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

**MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION'S
REPLY IN SUPPORT OF SUPPLEMENTATION OF HEARING EXHIBIT 479**

The record in this matter already contains Missouri Joint Municipal Electric Utility Commission's ("MJMEUC's") Hearing Exhibit 479¹ which includes, in response to a data request served by Missouri Landowners' Alliance ("MLA"), copies of the executed contracts between MJMEUC and the cities of Kirkwood and Hannibal for renewable Kansas wind energy delivered via the Grain Belt Express Clean Line Project ("Project").² The record in this matter also already contains the testimony of MJMEUC's CEO and President Duncan Kincheloe, in response to questions by both Staff and the Commissioners, that he expected contracts would soon be executed by the City of Columbia for an additional 35 MW and from the City of Centralia for an additional 1 MW of renewable energy delivered via the Project.³ Thus, MJMEUC's June 14th supplementation of Hearing Exhibit 479 is truly that – supplementation of an exhibit already received with the actual documents discussed during hearing testimony.

¹ Significantly, Hearing Exhibit 479 was received into the record of evidence during the hearing on this matter with no objection lodged by any party. See, Transcript, March 23, 2017, page 1005 line 4 to line 21 ("Tr. 1005:4 – 21").

² Tr. 980:19 – 981:8.

³ Tr. 980:21 – 981:15; 984:16-24; 995:1 – 997:2.

MLA does not claim any prejudice as grounds for its Motion to Strike MJMEUC's simple supplementation – and understandably so. Counsel for MLA was well aware during its cross-examination of Mr. Kincheloe that MJMEUC was working to complete contracts with Columbia and Centralia, and counsel further learned that MJMEUC's contracts with the 35 MoPEP cities, Kirkwood, Hannibal, Columbia and Centralia are all identical – excepting only the dates, names of the signing cities and the number of megawatts committed.⁴

MLA's objection is purely procedural – it has raised no substantive objection to the record of evidence in this matter being made full and complete by MJMEUC's supplementation of Hearing Exhibit 479. The Columbia and Centralia contracts are relevant to this matter, this Commission “has broad discretion in evidentiary determinations,”⁵ and MLA's motion to strike MJMEUC's supplementation of Hearing Exhibit 479 should be overruled.

Respectfully Submitted,

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⁴ Tr. 993:10 – 994:2.

⁵ *Deaconess Manor Assoc. v. PSC*, 994 S.W.2d 602, 611 (Mo. App. W.D. 1999).

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Missouri Joint Municipal Electric Utility Commission's Reply in Support of Supplementation of Hearing Exhibit 479 was served by electronically filing with EFIS and emailing a copy to the following interested persons on this 16th day of June, 2017:

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