

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

ROCKIES EXPRESS PIPELINE LLC’S APPLICATION TO INTERVENE

COMES NOW Rockies Express Pipeline LLC (“REX”), pursuant to 4 C.S.R. 240-2.075,
and for its Application for Intervention in Case No. EA-2016-0358 (“Grain Belt Express’s
Application for a CCN”), states as follows:

1. Rockies Express Pipeline LLC is a Delaware limited liability company registered to do business in the State of Missouri, with its principal office and place of business located at 4200 W. 115th St., Suite 350, Leawood, Kansas 66211-2609.
2. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to:

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3. REX owns an approximately 1,712-mile natural gas pipeline system that currently runs from Colorado and Wyoming to Clarington, Ohio, through which it provides interstate natural gas transportation services subject to the jurisdiction of the Federal Energy Regulatory Commission. As currently constituted, the system primarily consists of 36-inch and 42-inch diameter pipe with a long-haul west-to-east design capacity in Missouri of up to 1.8 billion cubic feet of natural gas per day. The REX pipeline system traverses Missouri through Buchanan, Clinton, Caldwell, Carroll, Chariton, Randolph, Audrain, Ralls and Pike Counties. Per statements in Grain Belt Express's Application for a CCN, Exhibit 3 thereto, and the pre-filed, direct testimony of Grain Belt Express's witness James G. Puckett, the proposed high voltage direct current ("HVDC") transmission line is anticipated to run parallel with and cross REX's facilities at multiple locations in seven of the nine Missouri counties where REX's facilities are located. REX's intervention request should be granted because currents created by the operation of a HVDC transmission line can interfere with the operation of and can damage underground pipelines and pipeline facilities, and because the construction, maintenance and repair of the HVDC transmission line may interfere with the safe and reliable operation of REX's pipeline or harm REX's pipeline. Therefore REX has a unique interest in the Applicant's application for a CCN that is different from that of the general public and an interest that could be adversely affected by any order in this case.

4. At this time REX is unsure whether it supports or opposes the proposed HVDC transmission line, because its position will depend on facts not yet adduced. Nonetheless, REX does take the position that in the events the Commission issues a CCN to Grain Belt Express and approves Grain Belt Express's proposed route, the Commission should mandate that Grain Belt Express (i) conducts a DC interference study (to identify potential negative impacts of the HVDC line to REX's pipeline system) prior to construction, testing or energization of the HVDC

line, (ii) implements all detection and mitigation measures indicated by the DC interference study, and (iii) complies with REX's published guidelines for crossing and engaging in construction work near its pipeline system, all in order to ensure that the HVDC line does not jeopardize the safe and reliable operation of REX's high pressure natural gas pipeline.

WHEREFORE, Rockies Express Pipeline LLC respectfully requests that the Commission grant it leave to intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

SMITH LEWIS, LLP

/s/ Sarah E. Giboney

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**Attorneys for Rockies Express Pipeline
LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Rockies Express Pipeline LLC's Application for Intervention was served via electronic mail (e-mail) or via regular mail on this 13th day of September, 2016 on counsel for all parties of record.

/s/ Sarah E. Giboney

Sarah E. Giboney