

**BEFORE THE PUBLIC SERVICE COMMISSION  
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,	)	<b>File No. EA-2014-0207</b>
Own, Operate, Control, Manage, and	)	
Maintain a High Voltage, Direct Current	)	
Transmission Line and an Associated	)	
Converter Station Providing an	)	
Interconnection on the Maywood -	)	
Montgomery 345 kV Transmission Line	)	

**VERIFIED APPLICATION OF IBEW LOCALS 2, 53 AND 1439 TO INTERVENE**

COME NOW International Brotherhood of Electrical Workers Locals 2, 53 and, 1439, AFL-CIO (“IBEW Unions”), by counsel, and respectfully apply to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075.

In support of this application, the Unions state:

1. This matter involves Respondents’ intention to upgrade the current electrical grid in Missouri.
2. The IBEW Unions are labor organizations that represent a large number of non-managerial, construction and maintenance electrical employees across Missouri. The IBEW Unions are the leading employee organization in the electrical industry.
3. The IBEW Unions are unincorporated associations. However, since labor unions are not required to register their names as fictitious names with the Missouri Secretary of State, the IBEW Unions do not have evidence of any such registration. The IBEW Unions may be contacted at the address and telephone number listed here:

Dave Desmond  
Business Manager  
IBEW Local 2

2131 59th Street  
St. Louis MO 63110  
(314) 645-2236

4. Though the IBEW Unions are “associations,” they do not seem to be the type of associations to which 4 CSR 240-2.060(1)(J) and 4 CSR 240-2.075(3) is directed. It does not appear to be the intent of those regulatory subsections for the Unions to file a list of all of their members, and the Unions hereby respectfully request a waiver of complying with said requirement. Should this Commission determine that the IBEW Unions must comply with the subsection, the required list will be tendered immediately.

5. All correspondence, communications, orders, and decisions of the Commission here should be sent to:

Sherrie Hall, MBN 40949  
Emily Perez, MBN 62537  
HAMMOND and SHINNERS, P.C.  
7730 Carondelet Avenue, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)  
[sahall@hammondshinners.com](mailto:sahall@hammondshinners.com) (e-mail)  
[eperez@hammondshinners.com](mailto:eperez@hammondshinners.com) (email)

6. The IBEW Unions do not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

7. The IBEW Unions do not have any annual reports or assessment fees that are overdue.

8. The IBEW Unions seek permission to intervene in this matter pursuant to 4 CSR 240-2.075.

9. As the exclusive collective bargaining representatives of non-managerial, non-professional electrical employees across Missouri, the IBEW Unions and the

employees they represent have interests in this proceeding which are clearly different from those of the complainant, the respondent, the general public, or any other party. The IBEW Unions have an obligation to provide a qualified, trained workforce to maintain the electrical transmission system. Determinations about construction and upgrades to the electrical grid will directly or indirectly impact the contracts connected to the electrical system in some manner, and therefore will impact the employees represented by the IBEW Unions. These separate interests could be adversely affected by a final order arising from the case.

10. Moreover, the IBEW Unions' expertise could be invaluable in assisting in determining the safest and most efficient manner to deal with issues arising from changes to the grid. Specifically, the IBEW Unions are concerned with the effects and handling of the addition of DC feeders on typical AC transmission lines, and with ensuring reliability of the grid.

11. The present grid was constructed in, or prior to, the 1950s and 1960s. It undoubtedly needs to be replaced and upgraded for larger energy transmission capacity. Based on the present information available to the IBEW Unions, they support Respondents' intentions to upgrade the grid in order to address the significant need for a more robust and reliable grid in the United States. In addition, the IBEW Unions support the proposed upgrades to address the need to provide a transmission system that will support renewable energy sources, many of which derive from remote locations.

12. No other party to this proceeding can adequately represent the additional, legitimate concerns of the IBEW Unions and the employees they represent here.

WHEREFORE, the IBEW Unions respectfully ask the Commission to grant this application and to permit the IBEW Unions to intervene here.

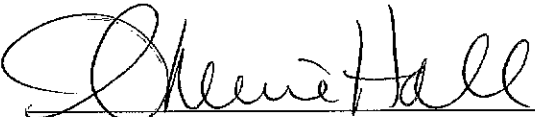
Respectfully submitted,

/s/ Sherrie Hall \_\_\_\_\_  
SHERRIE HALL, MBN 40949  
EMILY R. PEREZ, MBN 62537  
HAMMOND and SHINNERS, P.C.  
7730 Carondelet Avenue, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)

sahall@hammondshinners.com (email)  
eperez@hammondshinners.com (email)  
Attorneys for the IBEW Unions


**VERIFICATION**

COMES NOW Sherrie Hall and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Hall further states that she has been authorized to sign and file this application on behalf of the Unions.

  
\_\_\_\_\_  
SHERRIE HALL

Subscribed and sworn to before me this 11<sup>th</sup> day of April 2014.

My Commission Expires:

  
\_\_\_\_\_  
Notary Public



MARY M. SCHALLOM  
My Commission Expires  
June 13, 2014  
St. Louis County  
Commission #10482050

**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing was served on April 11, 2014, by United States mail, hand-delivery, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

/s/ Sherrie Hall\_\_\_\_\_