

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Grain Belt)
Express Clean Line LLC for Certificate of)
Convenience and Necessity Authorizing it to)
Construct, Own, Operate, Control, Manage)
And Maintain a High Voltage, Direct Current) Case No. EA-2014-0207
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-2014-0207 (“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 6640 W. 143rd St., Suite 200 Overland Park, Kansas 66223.
2. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to:

Colly J. Durley
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3. REX provides natural gas transportation services to the North American energy sector. REX owns an approximately 1,698-mile natural gas pipeline system that currently runs from Colorado and Wyoming to Clarington, Ohio. As currently constituted, the system consists of 36-inch and 42-inch diameter pipe with a long-haul design capacity 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 and Exhibit 3 thereto, the proposed high voltage direct current ("HVDC") transmission line is anticipated to run parallel with, or otherwise abut, 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 a HVDC transmission line can interfere with the operation of and can damage underground pipelines and pipeline facilities, and therefore REX has an 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. Specifically, REX believes an impact study must be conducted to determine whether Applicant's proposed HVDC transmission line may negatively affect the operation or safety of REX's underground pipeline and facilities and to determine what measures should be taken to mitigate negative impacts.

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 24th day of April, 2014 on counsel for all parties of record.

/s/ Sarah E. Giboney

Sarah E. Giboney