

FILED
December 5, 2014
Data Center
Missouri Public
Service Commission

Exhibit No.: 750
Issues: Public Interest; Need for Service
Witness: David Desmond
Sponsoring Party: International Brotherhood of Electrical Workers
Local 2, AFL-CIO
Type of Exhibit: Rebuttal Testimony
Case No.: EA-2014-0207
Date Testimony Prepared: September 15, 2014

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EA-2014-0207

REBUTTAL TESTIMONY

OF

DAVID DESMOND

ON

BEHALF OF

**INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 2, AFL-
CIO**

St. Louis, Missouri
September, 2014

IBEW Exhibit No. 750
Date 11-21-14 Reporter AF
File No. EA-2014-0207

**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 Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood -)
Montgomery 345 kV Transmission Line)

Case No. EA-2014-0207

AFFIDAVIT OF DAVID DESMOND

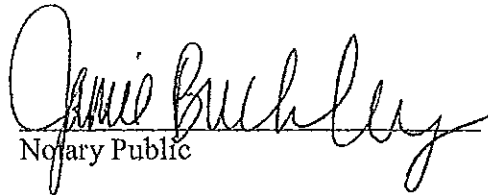
STATE OF MISSOURI)
) ss
COUNTY OF ST. LOUIS)

David Desmond, of lawful age, on his oath states: that he has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 5 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.



David Desmond

Subscribed and sworn to before me this 15th day of September, 2014.



Notary Public

My commission expires November 7, 2015



JAMIE BUCKLEY
My Commission Expires
November 7, 2015
St. Charles County
Commission #11285167

REBUTTAL TESTIMONY

OF

DAVID DESMOND

SUBMITTED ON BEHALF OF THE IBEW UNIONS

AMEREN

CASE NO. EA-2014-0207

1 **Q. Please identify yourself and your job title.**

2 **A.** My name is David Desmond. I am the Business Manager of International
3 Brotherhood of Electrical Workers Local 2, AFL-CIO ("IBEW 2"). My labor
4 organization represents about 1800-2000 members.

5 **Q. On whose behalf are you presenting this testimony?**

6 **A.** I am testifying on behalf of IBEW 2 and the coalition of IBEW unions involved in
7 this matter. The coalition consists of the International Brotherhood of Electrical
8 Workers, AFL-CIO, generally, as well as its Locals 2, 53, and 1439.

9 **Q. Please describe your history with IBEW 2.**

10 **A.** I worked as a lineman for approximately 20 years. Then I became Assistant
11 Business Manager for IBEW 2 for eight years, returned to work as a journeyman
12 lineman for one more year, and then was elected Business Manager in 2004. I
13 have worked and trained in the field of electricity for almost 40 years, and I
14 understand the transmission of electricity from numerous angles.

15 **Q. Please summarize your knowledge of your other coalition partners.**

16 **A.** The International Brotherhood of Electrical Workers, AFL-CIO represents
17 approximately 775,000 workers. IBEW 53 is headquartered in Kansas City,

1 Missouri with a wide-ranging geographical presence across Missouri. It
2 represents approximately 2000 members who include outside workers in line
3 clearance and tree trimming and utilities. IBEW 1439 is located in St. Louis,
4 Missouri. It represents approximately 1,000 Ameren workers.

5 **Q. Why is the IBEW Coalition interested in this matter?**

6 **A.** IBEW 2 represents construction linemen, utility, cooperative, municipal,
7 underground distribution technicians, tree trimmers and line clearance workers in
8 Missouri. IBEW 53 represents tree trimmers, line clearance and utility workers in
9 Missouri. IBEW 1439 represents Ameren employees who work in multiple facets
10 involving construction and maintenance of electrical transmission lines. The
11 IBEW International has an overall interest in improving the electronic
12 transmission grid across the United States. Our members stand to gain
13 employment in the construction and maintenance of the transmission lines
14 necessary to conduct wind power from Kansas to Illinois if the Application of
15 Grain Belt Express Clean Line LLC ("Grain Belt") is granted.

16 **Q. What is the purpose of this testimony?**

17 **A.** I believe Grain Belt's Application for a Certificate of Convenience and Necessity
18 to construct, own, operate, manage, and maintain a high voltage direct current
19 transmission line and associated facilities should be granted, because the service
20 provided by the Project is in the public interest. The Grain Belt Project will
21 promote a more environmentally-conscious, low-cost energy service across the
22 Midwest by reducing carbon dioxide, sulfur dioxide, nitrous oxides, mercury and
23 other particulate emissions that would occur if the same electricity were generated

1 by other generation sources; it will improve the electronic transmission grid in
2 Missouri for subsequent transmission of wind generated power; it will reduce
3 wholesale electricity prices in Missouri; and it will enable economic development
4 in Missouri by providing high-paying jobs to a skilled workforce in Missouri.

5 **Q. What is the scope of the project as it impacts the IBEW?**

6 **A.** Grain Belt intends to build approximately 206 miles of high-voltage direct current
7 (HVDC) line in Missouri.. A portion of the line will interconnect with an Ameren
8 Missouri line. Ameren Missouri lines are currently constructed and maintained
9 by IBEW-represented workers. Grain Belt intends to deliver up to 500 megawatts
10 (MW) of low-cost electricity to Missouri at one time, as well as up to 3500 MW
11 to Illinois and Indiana. For Missouri, this means that Grain Belt can generate 2.2-
12 2.6 million MW hours of electricity per year.

13 In addition to the transmission line, Grain Belt also intends to build a converter
14 station in Ralls County, Missouri, and various alternating current (AC)
15 interconnecting facilities. Grain Belt anticipates spending approximately
16 \$500,000,000 in Missouri building these facilities.

17 **Q. How will Grain Belt's Application, if approved, promote more**
18 **environmentally-conscious, low-cost electronic service?**

19 **A.** Wind energy is an abundant renewable source of energy in the Midwest.
20 However, the existing electric transmission grid cannot support the transmission
21 of clean wind energy such as that proposed here. By building the first HVDC
22 transmission line in Missouri, Grain Belt will encourage large-scale wind energy
23 development, as well as the construction of additional lines to carry that clean

1 energy to customers in Missouri and throughout the Midwest. These actions
2 should also serve to promote other environmentally friendly energy generation,
3 which is now hampered by the inability of the current grid to adequately convey
4 the product to the end user.

5 **Q. Would Grain Belt's Application impact reliability of electric transmission in**
6 **Missouri and, if so, how?**

7 **A.** Yes, approval of the Application would improve reliability of electric
8 transmission. By interconnecting with the Ameren line, Grain Belt Express
9 would provide another line in the State to transmit electricity. It would also
10 provide another -- cleaner and lower-cost -- source of electricity to those areas.

11 **Q. How would approval of Grain Belt's Application directly impact your**
12 **membership?**

13 **A.** Grain Belt will need approximately 1000 workers to build the transmission line in
14 Missouri. Many of these jobs will require the training and experience of IBEW-
15 represented workers. The construction of the Grain Belt Project will take
16 approximately 2.5 years. The jobs created by the construction will be good
17 paying jobs with benefits. After completion of construction, Grain Belt will
18 continue to employ about 70 workers to operate and maintain the line. Many of
19 those workers will also be IBEW-represented. These will also be good paying
20 jobs with benefits.

21 **Q. How do you respond to critics of Grain Belt's Application who contend the**
22 **jobs it creates will all be temporary, and therefore have no lasting impact on**
23 **the Missouri economy?**

1 | A. My local union, Local 2, is primarily a construction local. This means that most
2 | of the jobs we handle are temporary in nature. Yet this local has been in existence
3 | for more than 100 years. Construction begets future construction. In this case,
4 | the building of the first HVDC line is highly likely to lead to the building of
5 | future lines and associated facilities to enhance the electronic grid and make it
6 | capable of transmitting more renewable energy.

7 | **Q. Do you have any recommendations to this Commission?**

8 | A. On behalf of the International Brotherhood of Electrical Workers, AFL-CIO, and
9 | IBEW Local Unions 2, 53, and 1439, I recommend that the Commission grant
10 | Grain Belt's Application.

11 | **Q. Does that conclude your testimony?**

12 | A. Yes.

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