

**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 Trans-)
mission Line and an Associated Converter Station)
Providing an Interconnection on the Maywood-)
Montgomery 345kV Transmission Line.)

Case No. EA-2016-0358

RENEW MISSOURI'S STATEMENT OF POSITIONS

COMES NOW Renew Missouri Advocates ("Renew Missouri") and offers the following statement of positions:

Issue 1. Does the evidence establish that the Commission may lawfully issue to Grain Belt Express Clean Line LLC ("Grain Belt") the certificate of convenience and necessity ("CCN") it is seeking for the high-voltage direct current transmission line and converter station with an associated AC switching station and other AC interconnecting facilities?

Renew Missouri Position:

Yes. The Commission may lawfully issue a CCN to Grain Belt.¹

Issue 2. Does the evidence establish that the high-voltage direct current transmission line and converter station for which Grain Belt is seeking a CCN are "necessary or convenient for the public service" within the meaning of that phrase in section 393.170, RSMo.?

Renew Missouri Position:

Yes. The Grain Belt transmission line project is a major infrastructure expansion that will bring economic, market, policy and environmental benefits to Missouri and the surrounding region.² Furthermore, by installing a converter station in Missouri, the project will allow electric

¹ Section 393.170 RSMo; Grain Belt Express Clean Line, LLC v. PSC, No. SC 96993 (Mo. banc 2018).

² Berry Supplemental Direct, p. 1.

purchasers to access some of the lowest cost energy in the country.³ These considerations support a finding that the project is “necessary or convenient for the public service.”

Issue 3. If the Commission grants the CCN, what conditions, if any, should the Commission impose?

Renew Missouri Position:

The Commission should impose the conditions set forth in Staff’s Exhibits 205 and 206.

Issue 4. If the Commission grants the CCN, should the Commission exempt Grain Belt from complying with the reporting requirements of Commission rules 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D)?

Renew Missouri Position:

Renew Missouri supports variances from these rule provisions.

WHEREFORE, Renew Missouri submits its *Statement of Positions*.

Respectfully Submitted,

/s/ Tim Opitz
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 13th day of December 2018:

/s/ Tim Opitz

³ *Id* at 2.