

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

In the Matter of the Application of Grain Belt Express)
Clean Line LLC for Approval of its Acquisition by) File No. EM-2019-0150
Invenergy Transmission LLC)

**RENEW MISSOURI'S
STATEMENT OF POSITIONS**

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”),
and offers its *Statement of Positions*:

Issue 1: Does the Commission have jurisdiction and statutory authority under Section 393.190, RSMo., to approve the sale of Grain Belt Express Clean Line LLC ("Grain Belt") to Invenergy Transmission LLC ("Invenergy")?

Renew Missouri Position

Yes. Grain Belt is a public utility and so the applicants must get Commission approval before the sale moves forward.¹ The Commission issued Grain Belt a Certificate of Convenience and Necessity (“CCN”) in Case No. EA-2016-0358 after determining the transmission line is in the public interest. Now, prior to selling its assets to Invenergy, Section 393.190 RSMo requires Grain Belt to apply for Commission approval.

Issue 2: If so, should the Commission find that Invenergy’s acquisition of Grain Belt is not detrimental to the public interest, and approve the transaction?

Renew Missouri Position

Yes. With the Commission’s approval, Invenergy’s ownership will ensure that this transmission project has the resources, financial ability, and qualifications to develop, construct and operate the project. The transmission line will link customers in Missouri to low-cost wind energy that will help them save money and meet sustainability metrics. Furthermore, because the

¹ Owen Rebuttal, p. 4; Staff Rebuttal Report, pp. 1-2.

project facilitates additional renewable energy, there will be environmental, system reliability, and other economic benefits to Missouri.² Weighing the many benefits against any possible detriment, the application exceeds the “no detriment” standard because it is *beneficial* to the public interest and so the Commission should approve the transaction.

Issue 3: Should the Commission condition its approval of Invenergy’s acquisition of Grain Belt and, if so, what should such conditions be?

Renew Missouri Position

The conditions outlined by the Commission in its March 20, 2019 Report and Order on Remand in Case No. EA-2016-0358 have been agreed to by Invenergy and are appropriate in this case.

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

Respectfully,

/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 12th day of April 2019:

/s/ Tim Opitz

² Owen Rebuttal, pp. 5-9.