

**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	)	Case No. EA-2016-0358
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.	)	

**RESPONSE OF RENEW MISSOURI  
TO AGENDA DISCUSSION OF NOTICE REGARDING CASE STATUS**

COMES NOW Renew Missouri Advocates (“Renew Missouri”), by and through its attorney, and states the following in response to the discussion of the proposed Notice Regarding Case Status set forth as item No. 4 on the Commission’s May 24, 2017 Agenda and subsequently withdrawn:

1. At its May 24, 2017 Agenda Meeting, the Commission discussed the potential effects on the above-styled case due to the recent decision of the Missouri Western District Court of Appeals in the *Neighbors United* case. See *Neighbors United Against Ameren’s Power Line v. PSC*, No. WD 79883 (Mo. App. W.D., Mar. 28, 2017), applications for transfer filed, No. SC96427 (Mo., May 16, 2017) (“Neighbors United”). The Commission deliberated on a proposed notice regarding the status of this case before the Chairman ultimately withdrew the proposed notice.

2. As other parties have done – including Grain Belt Express Clean Line LLC (“Grain Belt”), Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), and Infinity Wind Power (“Infinity”) – Renew Missouri wishes to urge the Commission to make a

determination on Grain Belt's Application for a Certificate of Convenience and Necessity ("CCN") rather than delay the decision further.

3. As other parties have observed, the decision in the *Neighbors United* case presents no impediment to a decision in this case. Numerous substantive distinctions exist between *Neighbors United* and this case. Furthermore, the Commission's reasoning in its April 3, 2017 "Order Denying Motion to Dismiss or Hold in Abeyance" is still valid. We echo the arguments put forth in Grain Belt's June 1, 2017 Response filing on this issue.

4. Further delay in this case could threaten the significant cost savings that Missouri utilities and ratepayers anticipate as a result of the wind investments and transmission infrastructure planned by Grain Belt. The need for further electrical transmission to accommodate cheap, plentiful wind energy from Kansas is not in dispute. These infrastructure investments will eventually be made in Missouri, but the Commission's delay could make them more expensive for all parties involved.

WHEREFORE Renew Missouri respectfully requests that the Commission render a determination on the pending issues in this proceeding and issue a Report and Order in a timely manner.

Respectfully Submitted,

/s/ Andrew J. Linhares  
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ATTORNEY FOR RENEW MISSOURI

Certificate of Service

I hereby certify that a copy of the foregoing was served upon all counsel of record in this case on the 1st day of June, 2017.

*/s/ Andrew J. Linhares* \_\_\_\_\_

Andrew J. Linhares