

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) Case No. EA-2014-0207
Current Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood-)
Montgomery 345 kV Transmission Line)

**TRADEWIND ENERGY, INC.'S REPLY BRIEF TO THE POST-HEARING BRIEF OF
THE MISSOURI LANDOWNERS ALLIANCE**

Pursuant to the Order Setting Procedural Schedule and Other Procedural Requirements, entered June 18, 2014, TradeWind Energy, Inc. (“**TradeWind**”) timely submits this Reply Brief. This Reply Brief is submitted for the limited purpose of responding to the Initial Post-Hearing Brief of the Missouri Landowners Alliance (“**MLA**”), filed on December 8, 2014.¹ More specifically, on pages 24 through 28, MLA asserts that “Kansas wind farms will prefer to sell their energy into higher priced markets east of Missouri.”

In an attempt to advance its argument, MLA misstates and mischaracterizes the testimony of Frank Costanza, Executive Vice President Legislative and Regularly Affairs at TradeWind. First, MLA states that “Mr. Costanza made it quite clear that TradeWind Energy has no intention of selling its energy into Missouri.”² Second, MLA cites to testimony that TradeWind wants to transport wind energy from western Kansas to markets east of the Mississippi River.³ MLA makes similar arguments regarding the testimony of Matt Langley, Inifinity Wind Power.⁴

Such argument blindly ignores the testimony in this matter. For example, Mr. Costanza testified that:

¹ Documents 471 and 472.

² *Id.* at 26.

³ *See id.* at 26-27.

⁴ *See id.* at 26.

The Grain Belt project will produce significant economic development benefits of its own to the states within which it would be constructed because it would allow the delivery of low cost energy into Missouri with the installation of a converter station, and it would enhance the delivery of low cost wind energy to locales outside the SPP RTO that do not have ability to build cost effective wind projects in their own regions.⁵

Yes, Mr. Costanza testified about the transmission of energy to markets east of the Mississippi River.⁶ However, as shown by the quoted excerpt above, Mr. Costanza testified about the benefits the proposed Grain Belt project may provide to Missouri. He specifically stated that construction of the line “would allow the delivery of low cost energy into Missouri with the installation of a converter station.” Likewise, Matt Langley, Infinity Wind Power, testified that the proposed Grain Belt project “delivers power to Missouri” and will benefit the residents of Missouri.⁷ Similarly, Michael Goggin, Wind on the Wires / The Wind Coalition, testified regarding the benefits of wind energy in Missouri.⁸ Mr. Goggin explicitly testified that: “The GBE Project is critical for enabling further wind development to occur and for additional low-cost wind to be delivered to Missouri.”⁹

The entities in this case that are providers of wind energy and support the expansion of wind energy have testified unequivocally about the benefits of the proposed Grain Belt project to Missouri. The proposed Grain Belt project will provide an alternative means to transport wind energy into Missouri and other states to the east.

For the reasons set forth herein, and in TradeWind’s Post-Hearing Brief, filed December 8, 2014, TradeWind supports the approval of the CCN for Grain Belt with the conditions that Grain Belt has stated that it will accept.

⁵ Exhibit 725, Rebuttal Testimony of Frank Costanza, pages 2-3 (emphasis added).

⁶ *Id.*, at 5-6.

⁷ Exhibit 875, Rebuttal Testimony of Matt Langley, pages 3-6.

⁸ Exhibit 700, Rebuttal Testimony of Michael Goggin, page 3.

⁹ Exhibit 701, Cross Rebuttal Testimony of Michael Goggin, pages 7-8

Dated: December 19, 2014

Respectfully Submitted,

DOUTHIT FRETTS ROUSE GENTILE &
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid this 19th day of December 2014.

/s/ Christopher L. Kurtz, Esq.

Christopher L. Kurtz