

**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-2016-0358

**WIND ON THE WIRES' and THE WIND COALITION'S
POSITION STATEMENT**

COMES NOW Wind on the Wires and The Wind Coalition (“Wind Advocates”), by counsel, **respectfully files its position statement.**

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?

Yes, the Commission may lawfully issue Grain Belt a CCN.

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.?

Yes, the Grain Belt project is “necessary or convenient for the public service” within the meaning of section 393.170 RSMo. Wind on the Wires and The Wind Coalition address three of the five Tartan criteria -- need, public interest and economic feasibility -- and the facts demonstrate those criteria are satisfied.

Grain Belt is needed for utilities to meet the state renewable energy standard, to replace retiring generation, to meet the demands of corporate purchasers, and to deliver energy that can lower wholesale electricity prices. Grain Belt is in the public interest because it delivers energy that is comparable to or lower cost than alternative forms of generation, provides access to renewable energy that can act as a hedge against fuel price volatility, provides electricity with minimal environmental harm, and provides a diversity of wind generation to utilities in Missouri, MISO and PJM. Grain Belt provides all of the preceding benefits and there are no reasonable alternating current or direct current alternatives to it. The project is economically feasible because its energy and delivery costs are below the average wind power purchase agreement in Missouri, MISO and PJM.

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

Wind on the Wires and The Wind Coalition take no position on conditions the Commission should impose upon Grain Belt if it is granted a CCN, at this time.

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)?*

Wind on the Wires and The Wind Coalition take no position on requested waivers of the Commission's reporting requirements listed above.

Respectfully submitted,

/s/ Sean R. Brady

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CERTIFICATE OF SERVICE

The undersigned certifies that this Position Statement was electronically served upon all parties to this case on March 13, 2017.

/s/ Sean R. Brady

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