

Exhibit No. _____

Issues: Public Interest and Need for Grain Belt Express Clean Line

Witness: Ashok Gupta

Sponsoring Party: Natural Resources Defense Council

Type of Exhibit: Rebuttal Testimony

Case No. EA-2016-0358

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EA-2016-0358

REBUTTAL TESTIMONY

OF

ASHOK GUPTA

ON BEHALF

OF

NATURAL RESOURCES DEFENSE COUNCIL

January 24, 2017

1 **Q. Please state your name, address, and affiliation.**

2 A: My name is Ashok Gupta. I work for the Natural Resources Defense Council (“NRDC”).

3 My work address is NRDC, 20 N. Wacker Drive, Chicago, Illinois 60606.

4 **Q. Describe your background and professional qualifications?**

5 A: I have been with NRDC since 1991, working as a Senior Energy Economist on energy related
6 matters including energy efficiency, renewables, and utility regulatory policy. I have served as
7 NRDC’s Director of the Air & Energy program for ten years and most recently as Director of
8 Programs for almost three years. I was NRDC’s representative on Mayor Bloomberg’s Energy
9 Policy Task Force and Sustainability Advisory Board. Prior to NRDC, I worked at the City of
10 New York and the Public Utility Law Project of New York as an energy policy analyst.

11 My educational training includes undergraduate degrees in Physics and Math from
12 Georgetown University and a master’s degree in Economics from American University.

13 **Q. On whose behalf are you testifying?**

14 A: I am testifying on behalf of NRDC.

15 **Q. What is the purpose of your testimony?**

16 A: I am responding to the testimony of Grain Belt Express witnesses David Berry, Mark Lawlor,
17 Neil Copeland, James Puckett and James Arndt regarding the need for the service provided by
18 the Grain Belt Express Clean Line LLC and the public interest served by the project.

19 **Q. Please summarize your testimony.**

A20 NRDC supports the Grain Belt Express Application for Certificate of Convenience and
21 Necessity because the project brings needed clean, low-cost renewables to Missouri, helps lower
22 system costs for all customers, provides important health and environmental benefits for all
23 Missourians, and because of the particular care shown in siting the project.

1 **Q. Is there a need for the service from this project in Missouri?**

2 A. Yes, There is a need for the service provided by the Project. First, the Grain Belt Express'
3 Transmission Service Agreement with Missouri Joint Municipal Electric Utility Commission
4 ("MJMEUC") demonstrates the need for this project. Second, the transmission service offered by
5 Grain Belt Express will allow Missouri utilities to meet the requirements of Missouri's
6 Renewable Energy Standard ("RES"). Third, the Project will deliver low-cost renewable wind
7 generation that will save consumers in Missouri millions of dollars annually. Based on the
8 levelized cost of energy analysis provided by witness David Berry, the Project is the lowest-cost
9 way to meet renewable energy and other electric demand.

10 Fourth, substantial environmental and health benefits will be created by this project due
11 to the reduction in harmful emissions as a result of the increased renewable generation and
12 reduced fossil generation. Fifth, Missouri is highly dependent on coal-fired generation which
13 exposes utilities and ratepayers to higher costs of environmental compliance. As explained
14 below, increasing access to low-cost renewables through this project is needed in Missouri to
15 help reduce these compliance costs.

16 **Q. Is there a need for more renewable generation in Missouri?**

17 A. Yes. In addition to the RES, there are multiple environmental regulations pertaining to
18 waste and pollution that fossil fuel generators must comply with. Installing pollution control
19 equipment and new waste disposal requirements will increase the cost of fossil fuel generation
20 for utilities and ratepayers. For example, the Effluent Limitations Guidelines and Standards for
21 Steam Electric Power Generating Units are designed to reduce toxic metals and other harmful
22 pollutants discharged in the wastewater from steam electric power plants. Compliance with this
23 rule begins on November 1, 2018. The Coal Combustion Residual Rule regulates the disposal of

1 coal ash materials generated from coal-fired power plants and took effect in 2015. The Mercury
2 and Air Toxics Standards (MATS) Rule regulates toxic air emissions from coal and oil-fired
3 power plants, and was finalized in March 2016. Due to Missouri's dependence on coal
4 generation, the cost to comply with these regulations will almost certainly result in higher costs
5 for utilities and their customers. This project can lessen the dependence on coal-fired generation
6 in Missouri and have a positive impact on the cost of compliance.

7 **Q. Does the project serve the public interest?**

8 A. Yes. The Grain Belt Express serves the public interest by enabling the delivery of low-
9 cost renewable energy to the benefit of the State of Missouri. The project provides access to low-
10 cost Kansas wind energy that is otherwise unavailable due to lack of adequate infrastructure.
11 The project also provides Missouri load-serving entities with a cost-effective way to meet
12 Missouri's RES requirements as well as cost-effective compliance with current and future
13 emissions mandates. Inexpensive, clean renewable generation enabled by the project is in the
14 public interest of all Missourians.

15 **Q. Are there other aspects of the project that serve the public interest?**

16 A. Yes. The Project will lower emissions by enabling renewable energy and displacing
17 thermal generation which emits sulfur dioxide, nitrogen oxides, and carbon dioxide.

18 **Q. Has Grain Belt Express taken steps to minimize the environmental impact of the
19 project's footprint?**

20 A. Yes. The most effective way to reduce environmental impacts from a transmission
21 project is to avoid them in the first place. As described in the Missouri Route Selection Study,
22 attached as Schedule JGP-1 to witness James Puckett, Grain Belt Express spent years developing
23 the proposed route by collaborating with the conservation community, regulatory agencies, non-

1 governmental organizations and landowners to identify environmentally sensitive resources.
2 Specifically, Grain Belt Express worked closely with The Nature Conservancy of Missouri to
3 identify an alignment that avoided sensitive environmental areas. Further, the protocols Grain
4 Belt Express has developed will protect the land during and after construction of the project.
5 While all infrastructure projects have some impact on the environment, Grain Belt Express has
6 taken important steps to reduce impacts, and undertaken commitments to remediate impacts from
7 the project. As a result the substantial benefits described above make this project vitally
8 important to Missouri's environment and economy.

9 **Q. Does this conclude your pre-filed rebuttal testimony in this case?**

10 A. Yes.

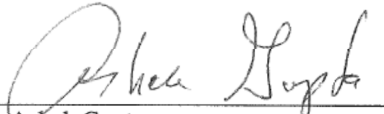
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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,) **File No. EA-2016-0358**
Control, Manage and Maintain a High Voltage, Direct)
Current Transmission Line and an Associated Converter)
Station Providing an Interconnection on the Maywood -)
Montgomery 345kV Transmission Line)

STATE OF KANSAS)
COUNTY OF JOHNSON)

AFFIDAVIT OF ASHOK GUPTA

Ashok Gupta, of lawful age, on his oath states: that he has participated in the preparation of the accompanying rebuttal testimony to be presented in the above case; that the answers in the rebuttal testimony were prepared by him or under his direction and supervision; that he has knowledge of the matters set forth in such answers; and that such answers are true to the best of his knowledge and belief.



Ashok Gupta

In witness whereof I have hereunto subscribed my name and affixed my official seal this 23 day of January, 2017.

