

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Grain Belt)
Express LLC for an Amendment to its Certificate)
Of Convenience and Necessity Authorizing it to) File No. EA-2023-0017
Construct, Own, Operate, Control, Manage, and)
Maintain a High Voltage, Direct Current)
Transmission Line and Associated Converter)
Station)

Motion Requesting Local Public Hearings

Pursuant to Rule 20 CSR 4240-2.015, the Missouri Landowners Alliance (MLA) et al. respectfully request the Commission to schedule local public hearings in Callaway, Audrain and Monroe counties concerning the project described in Grain Belt’s application of August 24, 2022.¹

1. In the last Grain Belt CCN case, File No. EA-2016-0358, the Commission held local public hearings in each of the eight counties in Missouri which were to be crossed by the proposed HVDC line in northern Missouri.²

2. That was not the first set of local public hearings held in those counties. In the first Grain Belt CCN case, File No. EA-2014-0207, local public hearings were also held in those same eight counties.³

3. The purpose of the Commission’s local public hearings is of course to allow members of the general public a chance to state their support or opposition to the Grain Belt project.⁴

¹ This filing is being submitted on behalf of the MLA, the Eastern Missouri Landowners Alliance d/b/a Show Me Concerned Landowners, Norman Fishel, Gary and Carol Riedel, and Dustin Hudson. For convenience, this group will be collectively referred to herein simply as the MLA.

Also, the Commission Rules apparently do not specifically provide for a request for public hearings. To the extent deemed necessary, the MLA respectfully asks the Commission to accept this filing pursuant to Rule 20 CSR 4240-2.015, Waiver of Rules.

² Report and Order on Remand, issued March 20, 2019, p. 6.

³ Order Setting Local Public Hearings and Directing Notice, issued June 27, 2014, EFIS 104.

4. During the two CCN cases cited above, none of the Grain Belt facilities were to encroach on either Audrain or Callaway County. In the instant case, however, Grain Belt is proposing a new 40-mile “Tiger Connector” line which would run from the converter station now proposed for Monroe County, through Audrain County, and into Callaway County where Grain Belt hopes to connect to the transmission system in Missouri.⁵

5. Inasmuch as the general public in Audrain and Callaway Counties had no reason to believe they would be directly affected by the Grain Project until well after the close of the last case, as a practical matter they have had no real opportunity to express their views on the Grain Belt project at a hearing conducted by the Commission.

6. The proposed DC line crossing the eight counties in northern Missouri would be approximately 206 miles in length, thus producing an average span of only about 26 miles through each county.⁶

7. In contrast, the 40-mile Tiger Connector will cover only 3.7 miles in Monroe County,⁷ leaving approximately 36 miles of high-voltage transmission line to be built in Audrain and Callaway Counties, combined. The average impact from this new 40-mile, high-voltage AC line will clearly be just as significant to the residents of Audrain and Callaway Counties as would be the impact of the DC line on the eight counties where the public hearings were held on two separate occasions.

⁴ See statement by Judge Bushmann at the public hearing in the last Grain Belt CCN case, ER-2016-0358, Tr. Vol. IV, p. 5, lines 13-17, EFIS 114.

⁵ See Grain Belt’s Application, filed in the instant case on August 24, 2022, p. 8, par. 19.b.

⁶ See Report and Order on Remand, issued March 20, 2019 in File No. EA-2016-0358, p. 9 par. 5-6. 206 miles/8 counties equals approximately 26 miles per county.

⁷ Direct testimony of Andrew Burke, Schedule AB-2, pages 40 and 42 of 87.

8. A converter station is a large collection of electrical facilities capable of converting alternating current (AC) power to direct current (DC) power, or vice versa.⁸ The converter station initially proposed for Ralls county was to be of a type which typically would occupy an area of approximately 45 to 60 acres.⁹ That converter station would itself have constituted an unsightly nuisance. The larger one now proposed for Monroe County will be all that and more.

9. In particular, the converter station now proposed for Monroe County would have a capacity of 2,500 MW, compared to the original proposal for a converter station of only 500 MW in Ralls County.¹⁰ The revised version of the converter station will cost some \$500 million more to build than the converter station originally proposed, and will of course be larger in size to some extent not yet known.¹¹

10. Because the converter station was originally to be built in Ralls County, the general public in Monroe County had no reason to be concerned about the direct impact of a converter station in their vicinity. Moreover, the converter station now proposed for Monroe County is a much different facility than what they were led to believe would be installed. Accordingly, the citizens of Monroe County have had no realistic opportunity at this point to voice their concerns to the Commission about the massive structure Grain Belt is now proposing to add to their community.

⁸ See GBE's Application in File EA-2016-0358, par 18; Report and Order on Remand in that case, p. 9, par. 7; Direct testimony of Grain Belt witness Dr. Anthony Wayne Galli in that same case, p. 7 lines 7-8, EFIS 37; and description of the components of a converter station in the Direct Testimony of Dr. Galli in Case No. EA-2014-0207, EFIS 7, p. 7 lines 9-14 and his Schedule AWG-1.

⁹ See Direct Testimony of Grain Belt witness Thomas Shiflett in File No. EA-2016-0358, page 14, Sec. 2.2.2 of Schedule TFS-4 and page 16, Sec. 2.1.4.

¹⁰ Grain Belt's Application to Amend in the instant case, p. 9, par. 21 and p. 19, par. 41.

¹¹ See File No. EC-2021-0059, testimony of Grain Belt witness Mr. Kris Zadlo, Tr. Vol. 1, p. 80 lines 17-24 and p. 81 line 19 – p. 82 line 13.

11 In scheduling the local public hearings in the last Grain Belt case, the Commission used several approaches for making the general public aware of the local hearings: i.e., notice of the public hearings was provided to the county commission in each of the counties where the hearings were to be held; notice was provided to members of the General Assembly who represent residents of those counties, as well as to the media that serve any of the eight counties; and Grain Belt was directed to provide specified forms of notice of the public hearings through newspaper ads in newspapers serving the counties in question.¹² There is no logical reason why the residents of the three counties in question here should not be provided with the same notice of the public hearings as was utilized in the last case.

WHEREFORE, the MLA respectfully asks the Commission (1) to schedule public hearings in Monroe, Callaway and Audrain Counties concerning the revised project proposed by Grain Belt in the instant case; (2) to adopt the same means of notice for those public hearings as the Commission utilized in Grain Belt's last CCN case, as referenced in the preceding paragraph; and (3) to the extent deemed necessary, to accept this Motion pursuant to the Commission's Rule 20 CSR 4240-2.015, Waiver of Rules.¹³

¹² Order Setting Local Public Hearings and Directing Notice, File EA-2016-0358, issued October 19, 2016, p. 3, par. 3-5, EFIS 97

¹³ See par. 2 of footnote 1 above.

Respectfully submitted,

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Certificate of Service

A copy of this filing was served by electronic mail this 1st day of November, 2022, to all parties of record.

/s/Paul A. Agathen