

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-2014-0207

**REPLY TO STAFF’S RESPONSE TO THE
RECOMMENDATION OF GRAIN BELT EXPRESS CLEAN LINE LLC**

Grain Belt Express Clean Line LLC (“Grain Belt Express” or “Company”) states the following in reply to Staff’s June 18, 2015 Response to the Recommendation filed by the Company on June 10:

1. Although Staff did not take a position on the Company’s Recommendation, it noted that certain of the information requested by the Commission such as interconnection agreements and RTO planning studies would not be available for several more months. See Staff Response, ¶ 2-4, 6. Staff indicated that if “significant new information” became available regarding “the design or planned operation of the project, it is likely that such information would be best considered in a new proceeding.” Id., ¶ 7.

2. As a result of these comments, the Company conferred with Staff regarding the state of the record and its view that certain facts regarding the Project need to be clarified and supplemented. Staff indicated that if the Commission granted a suspension of the proceedings, it would meet with the Company regarding issues that needed to be addressed. The Company advised Staff that if a suspension were granted, Grain Belt Express would confer with Staff in an effort to improve the production cost modeling and related studies that have been presented to the Commission.

3. Holding this case in abeyance would also permit Grain Belt Express, Staff and other parties to assess the regulations that the U.S. Environmental Protection Agency has announced it will issue in August as the Clean Power Plan, pursuant to Section 111(d) of the Clean Air Act. Although the Missouri Department of Natural Resources and other state environmental agencies will then begin a process of determining how to comply with such rules, the regulatory landscape from an environmental and energy perspective will be much clearer after the final EPA rules are promulgated.

4. The Company proposes that the case be suspended for a period of time to be determined by the Commission, but in any event no longer than six months. Once the period of suspension has ended, Grain Belt Express will work with the other parties to develop a procedural schedule to govern the final stage of this proceeding.

5. In order to assure the Commission that progress is being made during any period of abeyance, the Company proposes to file status reports on a 60-day basis to keep the Commission advised of the work that is being pursued.

6. Given the important public policy issues presented in this case, as well as the Commission's desire to ascertain whether the Project meets the factors required for the issuance of a certificate of public convenience and necessity, holding this matter in abeyance for a period not to exceed six months for the purposes outlined above and in the Company's June 10, 2015 Recommendation would be appropriate.

WHEREFORE, Grain Belt Express Clean Line LLC asks that its Recommendation be accepted by the Commission.

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ATTORNEYS FOR GRAIN BELT EXPRESS

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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 23rd day of June 2015.

/s/ Karl Zobrist

Attorney for Grain Belt Express Clean Line LLC