

Show me Exhibit No. 412
Date 3-22-17 Reporter MLC
File No. EA-2016-0358

BEFORE THE PUBLIC SERVICE
COMMISSION OF THE STATE OF MISSOURI

FILED
April 4, 2017
Data Center
Missouri Public
Service Commission

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

**GRAIN BELT EXPRESS RESPONSES TO SHOW ME CONCERNED LANDOWNER'S
SECOND SET OF DATA REQUESTS TO GRAIN BELT EXPRESS CLEAN LINE LLC**

Item No.

Description

If possible, please respond to all data requests, excluding any attachments, in one document.

With respect to Grain Belt's representation in its Application in FERC Docket No. ER14-409, at page 13, stating, "Further, because potential customers can pursue alternative transmission service from incumbent transmission owners operating where the Project will be built at cost-of-service rates (capped at the incumbent utility's cost of expansion), . . .," please provide the following:

(a) An explanation of the reasons justifying the representation,

RESPONSE: A potential customer of Grain Belt Express could also request transmission service from the applicable regional transmission organizations (RTOs) SPP, MISO, and PJM. The RTOs would coordinate with the incumbent transmission owners to determine the necessary transmission infrastructure needed to grant the requested service. The incumbent transmission owners are obligated to expand their transmission network to accommodate any such transmission service request at the requestor's expense. If it is more cost-effective for a customer to pay for any potential new facilities and network upgrades, and acquire transmission service through the RTO and incumbent transmission owners, they would not acquire Grain Belt Express service.

(b) The name, employer, position, and business address of the person primarily responsible on behalf of Grain Belt for providing the factual information supporting the representation,

RESPONSE: David Berry, CFO of Clean Line Energy Partners LLC, is familiar with this statement and able to address its factual basis. Mr. Berry's business address is 1001 McKinney St, Ste 700, Houston, TX 77002.

- (c) A list of the "incumbent transmission owners" Grain Belt meant in the representation,

RESPONSE: All transmission owner members of SPP, MISO, and PJM.

- (d) The method Grain Belt anticipated "potential customers can pursue alternative transmission service from incumbent transmission owners," and

RESPONSE: See response to 2.1(a).

- (e) The amount of transmission service Grain Belt anticipated potential customers can pursue from incumbent transmission owners.

RESPONSE: There is no limit to the amount of transmission service a potential customer can pursue. However, it is likely that a large request would require significant expenditures in order to build new facilities.

With respect to Grain Belt's representation in its Application in FERC Docket No ER14-409, at page 13, stating, "customers will purchase transmission service from Applicant only to the extent that it is cost-effective to do so," please provide the following:

- (a) An explanation of the reasons justifying the representation,

RESPONSE: The customer would not purchase transmission service if it is not cost-effective to do so because they could obtain energy from other sources or make an alternative transmission arrangement. See 2.1 (a) above.

- (b) The name, employer, position, and business address of the person primarily responsible on behalf of Grain Belt for providing the factual information supporting the representation, and

RESPONSE: David Berry, CFO of Clean Line Energy Partners LLC, is familiar with this statement and able to address its factual basis. Mr. Berry's business address is 1001 McKinney St, Ste 700, Houston, TX 77002.

- (c) A definition or explanation of what Grain Belt meant by "cost-effective"

in the representation.

RESPONSE: Cost-effective means that Grain Belt Express' service is less expensive than alternative transmission solutions and provides for a competitive delivered cost of energy.

With respect to Grain Belt's representation in its Application in FERC Docket No. ER14-409, at page 13, stating, "Moreover, there are potentially competing transmission projects being considered in the area that provide an alternative to the Project and therefore will discipline Applicant's negotiated rates," please provide the following:

- (a) An explanation of the reasons justifying the representation,

RESPONSE: SPP and MISO have undergone planning processes to improve their high voltage transmission system by building new transmission lines that, among other benefits, facilitate the addition of new renewable and non-renewable generation in the region. See <https://www.spp.org/engineering/transmission-planning/priority-projects/> and <https://www.misoenergy.org/Planning/TransmissionExpansionPlanning/Pages/MVPAnalysis.aspx>.

- (b) The name, employer, position, and business address of the person primarily responsible on behalf of Grain Belt for providing the factual information supporting the representation, and

RESPONSE: David Berry, CFO of Clean Line Energy Partners LLC, is familiar with this statement and able to address its factual basis. Mr. Berry's business address is 1001 McKinney St, Ste 700, Houston, TX 77002.

- (c) A list of the "potentially competing transmission projects being considered in the area,"

RESPONSE: The SPP Priority and MISO MVP projects are alternative and potentially competing transmission projects in the area.

- (d) A definition or explanation of the word "discipline" in the representation.

RESPONSE: Other transmission projects provide Grain Belt Express transmission customers with another means of obtaining service, therefore limiting the rates that Grain Belt Express can charge.

With respect to Grain Belt's representation in its Application in FERC Docket No. ER14-409, at page 16, stating, "Applicant's proposed criteria are intended to incent early movers and minimize commercial risks that could adversely affect the

economic viability of the Project,” please provide the following:

- (a) An explanation of how the “proposed criteria” is “intended to incent early movers,”

RESPONSE: The selection and ranking criteria that Grain Belt Express proposed in its open solicitation process reward generation projects in advanced development stages and customers willing to make commitments to Grain Belt Express that align with Grain Belt Express’ development needs and project schedule.

- (b) A list of the “commercial risks” the proposed criteria is intended to minimize,

RESPONSE: 1) that Grain Belt Express would need to make large capital outlays prior to shippers making commitments to the project and 2) that generation projects could not be completed on time in order to generate energy to be carried on the Grain Belt Express.

- (c) An explanation of how each “commercial risk” could “adversely affect the economic viability of the Project,” and


RESPONSE: Without sufficient revenue commitments and developed wind generation projects, the Project may not be able to obtain financing and be constructed.

- (d) The name, employer, position, and business address of the person primarily responsible on behalf of Grain Belt for providing the factual information supporting the representation.

RESPONSE: David Berry, CFO of Clean Line Energy Partners LLC, is familiar with this statement and able to address its factual basis. Mr. Berry’s business address is 1001 McKinney St, Ste 700, Houston, TX 77002.

VERIFICATION OF RESPONSE

The answers provided to this Set of Data Requests have been collected from various sources at Clean Line Energy Partners LLC and Grain Belt Express Clean Line LLC, and are true and accurate to the best of my knowledge and belief.

Signed:  _____

Position: General Counsel

Clean Line Energy Partners LLC

Date: 12/2/16

