

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

In the Matter of the Application of Grain Belt)
Express Clean Line LLC for Certificate of)
Convenience and Necessity Authorizing it to) Case No. EA-2016-0358
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.)

**RESPONSE OF INFINITY WIND POWER TO THE MISSOURI JOINT MUNICIPAL
ELECTRIC UTILITY COMMISSION’S RESPONSE TO AGENDA
DISCUSSION REGARDING CASE STATUS**

Infinity Wind Power (Infinity) hereby supports the comments offered by the Missouri Joint Municipal Electric Utility Commission (MJMEUC) in response to the Commission’s agenda discussion regarding the case status in this matter, and states the following:

1. On May 31, 2017, MJMEUC filed its *Response to Agenda Discussion Regarding Case Status* (MJMEUC Response), noting that any undue delay by the Commission in issuing a decision in this matter could result in thousands of Missouri retail customers being denied hundreds of millions of dollars in savings, because such delay could impeded the development of the Grain Belt Express Project and further implicate the Power Purchase Agreement with Infinity.¹ MJMEUC argued that the non-final *Neighbors United* decision issued by the Western District of the Missouri Court of Appeals² was not applicable to the Commission’s decision in this matter because *Neighbors United* involved different legal and factual issues than those

¹ MJMEUC Response, p. 2.

² *Neighbors United Against Ameren’s Power Line v. PSC*, No. WD79883 (Mar. 28, 2017), applications for transfer filed, No. SC96427 (May 16, 2017) (*Neighbors United*).

before the Commission as part of Grain Belt Express' application for a line certification pursuant to Section 393.170.1.³

2. Infinity supports MJMEUC's comments and arguments, and with regard to the *Neighbors United* matter, notes that multiple parties, including Infinity, filed responses to the Commission's March 29, 2017, *Order Directing Filing Regarding Motion to Dismiss, or in Alternative, Hold Case in Abeyance* (March Order), arguing that *Neighbors United* is not applicable to the instant case.⁴ Rather than restate those arguments here, Infinity incorporates herein by reference its response to the Commission's March Order, and further notes its support for the referenced parties' arguments on this issue.

3. Infinity appreciates the thoughtfulness with which the Commission is approaching its decision in this matter and urges the Commission to issue its Order in this matter as expediently as possible.

WHEREFORE, Infinity Wind Power respectfully requests the Commission expediently issue an Order finding the Grain Belt Express Project to be in the public interest, and thereby granting the requested certificate of convenience and necessity.

Respectfully submitted,

³ MJMEUC Response, pp. 2-3.

⁴ See responses of Grain Belt Express, MJMEUC, Wind on the Wires/The Wind Coalition, Renew Missouri, and the Missouri Industrial Energy Consumers, filed Mar. 31, 2017.

/s/ Terri Pemberton

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ATTORNEYS FOR INFINITY WIND POWER

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon the parties to this proceeding by email or U.S. Mail, postage prepaid, this 1st day of June 2017.

/s/ Terri Pemberton

Terri Pemberton

Attorney for Infinity Wind Power