

**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)	Case No. EA-2016-0358
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)	

APPLICATION TO INTERVENE BY
WIND ON THE WIRES and THE WIND COALITION

COMES NOW Wind on the Wires and The Wind Coalition (“Wind Advocates”), by counsel, and hereby petitions the Public Service Commission of the State of Missouri ("PSC" or "Commission") for an order permitting Wind on the Wires and The Wind Coalition to intervene in this proceeding under 4 CSR 240-2.075 as interested entities. In support of this Application to Intervene, Wind on the Wires and The Wind Coalition state and allege as follows:

1. Wind on the Wires is a not-for-profit corporation organized and existing under the laws of the State of Minnesota. Wind on the Wires is a collaborative organization dedicated to wind energy’s fair access to the electric transmission system and market throughout the Midwest. Our Board of Directors and members are comprised of wind developers, environmental organizations, wind energy experts, tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry in Missouri and across the country. Members of Wind on the Wires operate plants in Missouri and also have contracts to provide energy to utilities in Missouri. Wind on the Wires is located at 570 Asbury Street, Suite 201, St. Paul, MN 55104. Notice and

mailings may be sent to:

Sean R. Brady
Attorney -- Regional Counsel & Policy Manager
P.O. Box 4072
Wheaton, IL 60189-4072
Telephone: 312-867-0609
Email: sbrady@windonthewires.org.

2. The Wind Coalition is a not for profit association formed to encourage the development of the vast wind energy resources of the south central United States. The Wind Coalition is active in two particular regions: the Southwest Power Pool (“SPP”) and the Electric Reliability Council of Texas (“ERCOT”) grid systems, which cover all or part of twelve states (Texas, Oklahoma, Kansas, Nebraska, Missouri, Arkansas, Louisiana, New Mexico, South Dakota, North Dakota, Iowa and Montana). The Wind Coalition’s members include developers, manufacturers and public interest advocates. Members of The Wind Coalition operate plants in Missouri and also have contracts to provide energy to utilities in Missouri. Per Commission Rule 2.075(2)(D) a list of members is attached to this application as Exhibit A. Mailings and notices may be sent to:

Jeff Clark
Executive Director
610 Brazos Street, Suite 210
Austin, TX 78701
Telephone: 512-651-0291
Email: jeff@WindCoalition.org.

3. This motion is brought within the deadline to seek intervention established in the Commission’s Order Directing Notice, Setting Intervention Deadline.
4. Wind on the Wires and The Wind Coalition will be directly impacted by the decision to grant or deny Grain Belt Express Clean Line L.L.C. (“Grain Belt”) a certificate of convenience and necessity. Grain Belt seeks permission to build, operate and maintain a high voltage, direct current (“HVDC”) transmission line that will traverse Missouri

from Kansas to Illinois and terminate in Indiana. Electricity converter station facilities will be built to deliver low-cost electricity generated by wind energy facilities in Kansas to load and population centers in Missouri, Illinois, Indiana and to utilities operating in other states in the Midcontinent ISO (“MISO”) and PJM footprints. If the certificate of need is not granted, Wind on the Wires and The Wind Coalition members will be materially harmed because they lose the opportunity to build wind energy facilities in Kansas that would deliver cost effective renewable energy into Missouri, Illinois and Indiana and other states served by SPP, MISO and PJM.

5. Wind on the Wires and The Wind Coalition will be supporting the certificate of convenience and necessity sought by Grain Belt.
6. No other party or entity interested in this proceeding can adequately represent the interests of Wind on the Wires and The Wind Coalition because their interest differs from those of Infinity Wind Power, Missouri Industrial Energy Consumers, Eastern Missouri Landowners Alliance, and International Brotherhood of Electrical Workers Local Unions 2 and 53 granting intervention will advance the interests of justice and will in no way impair the prompt consideration and resolution of this matter by the Commission.
7. Wind on the Wires’ and The Wind Coalition’s intervention will serve the public interest by assisting the development of a full and complete record for the PSC's decision in this case.

Wherefore, Wind on the Wires and The Wind Coalition seek permission to intervene and provide additional information, which will serve the public interest in the referenced case.

Respectfully submitted,

/s/Deirdre K. Hirner
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*Attorney for Wind on the Wires and
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/s/ Sean R. Brady
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*Attorney for Wind on the Wires and
The Wind Coalition*

Exhibit A: Members of The Wind Coalition

Members of The Wind Coalition represent a diverse cross-section of America's leading energy companies. For more information about the Members, their web sites are provided as hyperlinks.

- [AES Wind Generation](#)
- [Acciona](#)
- [American Wind Energy Association \(AWEA\)](#)
- Advanced Energy Technology Council
- [Apex Clean Energy](#)
- [Blattner Energy, Inc.](#)
- [BP Alternative Energy North America](#)
- [Clean Line Energy](#)
- D.E. Shaw and Company
- [Duke Energy](#)
- [Edison Mission Energy](#)
- [EDP Renewables](#)
- [ENEL](#)
- [EDF Renewables](#)
- [E.ON](#)
- [Exelon](#)
- [Electric Power Engineers, Inc](#)
- [GE Energy](#)
- [Google](#)
- [Iberdrola Renewables](#)
- [Infinity Wind](#)
- [Invenergy](#)
- [Lincoln Clean Energy](#)
- [NextEra Energy Resources](#)
- [Novus Windpower](#)
- [Pattern](#)
- [RES Americas](#)
- [Siemens](#)
- Southern Company
- [Third Planet](#)
- [TradeWind Energy, LLC](#)
- [Vestas-Americas, Inc.](#)

Wind Coalition members also include several environmental and consumer-focused non-profit organizations, including:

- [Environmental Defense Fund \(EDF\)](#)
- [Public Citizen](#)
- [Texas Renewable Energy Industries Association \(TREIA\)](#)

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on September 12, 2016.

/s/ Deirdre K. Hirner
Attorney for Wind on the Wires and
The Wind Coalition