

Exhibit No.:
Issues: Public Interest; Need for Service
Witness: Stephen White
Sponsoring Party: International Brotherhood of Electrical Workers
Locals 2 and 53, AFL-CIO
Type of Exhibit: Rebuttal Testimony
Case No.: EA-2016-0358
Date Testimony Prepared: January 19, 2017

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EA-2016-0358

REBUTTAL TESTIMONY

OF

STEPHEN WHITE

ON

BEHALF OF

**INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL 53, AFL-
CIO**

**Kansas City, Missouri
January, 2017**

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-2016-0358

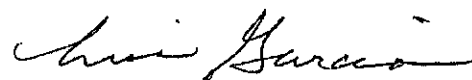
AFFIDAVIT OF STEPHEN WHITE

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

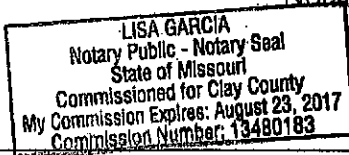
Stephen White, of lawful age, on his oath states: that he has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 5 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.


Stephen White

Subscribed and sworn to before me this 20th day of January, 2017.



Notary Public.



My commission expires _____

REBUTTAL TESTIMONY
OF
STEPHPEN WHITE
SUBMITTED ON BEHALF OF THE IBEW UNIONS
AMEREN
CASE NO. EA-2016-0358

1 **Q. Please identify yourself and your job title.**

2 **A.** My name is Stephen White. I am the Business Manager of International
3 Brotherhood of Electrical Workers Local 53, AFL-CIO (“IBEW 53”), which is
4 headquartered in Kansas City, Missouri, with a wide-ranging geographical
5 presence across the state. IBEW 53 represents approximately 2,634 employees
6 for purposes of collective bargaining.

7 **Q. On whose behalf are you presenting this testimony?**

8 **A.** I am testifying on behalf of IBEW 53 and the coalition of IBEW unions involved
9 in this matter. The coalition consists of the International Brotherhood of
10 Electrical Workers, AFL-CIO, generally, as well as its Locals 2 and 53.

11 **Q. Please describe your history with IBEW 53.**

12 **A.** I worked as a lineman for approximately 11 years. I was elected President of
13 IBEW 53 in 2002, and served as President and Business Agent until June of 2014.
14 At that time, I was elected Business Manager of IBEW 53, and continue to serve
15 n that role. I have worked and trained in the field of electricity for over 25 years,
16 and I understand the transmission of electricity from numerous angles.

17 **Q. Please summarize your knowledge of your other coalition partners.**

1 A. The International Brotherhood of Electrical Workers, AFL-CIO represents
2 approximately 750,000 workers. IBEW Local 2 is headquartered in Saint Louis,
3 Missouri and represents approximately 1,836 total employees for purposes of
4 collective bargaining.

5 **Q. Why is the IBEW Coalition interested in this matter?**

6 A. IBEW 53 represents construction line, line clearance, tree trimming, utility and
7 power plant workers in Missouri. IBEW 2 represents construction line, utility,
8 cooperative, municipal, underground distribution, tree trimming and line
9 clearance workers in Missouri. The IBEW International has an overall interest in
10 improving the electronic transmission grid across the United States. If the
11 Commission grants the Application of Grain Belt Express Clean Line LLC
12 (“Grain Belt”), our members stand to gain employment in construction and
13 maintenance of the transmission lines necessary to conduct wind power from
14 Kansas to Illinois, through Missouri.

15 **Q. What is the purpose of this testimony?**

16 A. I believe that Grain Belt’s Application for a Certificate of Convenience and
17 Necessity to construct, own, operate, manage, and maintain a high voltage direct
18 current transmission line and associated facilities should be granted, because the
19 service provided by the Project is in the public interest. The Grain Belt Project
20 will promote a more environmentally-conscious, low-cost energy service across
21 the Midwest by reducing carbon dioxide, sulfur dioxide, nitrous oxides, mercury
22 and other particulate emissions that would occur if the same electricity were
23 generated by other generation sources; it will improve the electronic transmission

1 grid in Missouri for subsequent transmission of wind generated power; it will
2 reduce wholesale electricity prices in Missouri; and it will enable economic
3 development in Missouri by providing high-paying jobs to a skilled workforce in
4 Missouri.

5 **Q. What is the scope of the project as it impacts the IBEW?**

6 **A.** Grain Belt intends to build approximately 206 miles of high-voltage direct current
7 (HVDC) line in Missouri. A portion of the line will interconnect with an Ameren
8 Missouri line. Ameren Missouri lines are currently constructed and maintained
9 by IBEW-represented workers. Grain Belt intends to deliver up to 500 megawatts
10 (MW) of low-cost electricity to Missouri at one time, as well as up to 3500 MW
11 to Illinois and Indiana. For Missouri, this means that Grain Belt can generate 2.2-
12 2.6 million MW hours of electricity per year.

13 In addition to the transmission line, Grain Belt also intends to build a converter
14 station in Ralls County, Missouri, and various alternating current (AC)
15 interconnecting facilities. Grain Belt anticipates spending approximately
16 \$525,000,000 on the Missouri portion of the Project.

17 **Q. How will Grain Belt's Application, if approved, promote more
18 environmentally-conscious, low-cost electronic service?**

19 **A.** Wind energy is an abundant renewable source of energy in the Midwest.
20 However, the existing electric transmission grid cannot support the transmission
21 of clean wind energy such as that proposed here. By building the first HVDC
22 transmission line in Missouri, Grain Belt will encourage large-scale wind energy
23 development, as well as the construction of additional lines to carry that clean

1 energy to customers in Missouri and throughout the Midwest. These actions
2 should also serve to promote other environmentally friendly energy generation,
3 which is now hampered by the inability of the current grid to adequately convey
4 greener energy to the end user.

5 **Q. Would Grain Belt's Application impact reliability of electric transmission in**
6 **Missouri and, if so, how?**

7 **A.** By interconnecting with the Ameren line, Grain Belt Express would provide
8 another line in the State to transmit electricity. It would also provide another –
9 cleaner and lower-cost – source of electricity to those areas.

10 **Q. How would approval of Grain Belt's Application directly impact your**
11 **membership?**

12 **A.** Grain Belt will need approximately 1,500 workers during the construction phase
13 of the Project. Many of these jobs will require the training and experience of
14 IBEW-represented workers. The jobs created by the construction will be good
15 paying jobs with benefits. After completion of construction, Grain Belt will
16 continue to employ about 90 workers to operate and maintain the line for the first
17 year. These jobs will also require the training and experience of IBEW-
18 represented workers, and will also be good paying jobs with benefits. Grain Belt
19 has not promised or guaranteed employment to members of the IBEW Unions,
20 but the IBEW members' training and experience would make them good
21 candidates for the jobs created by the Project.

1 **Q. How do you respond to critics of Grain Belt's Application who contend the**
2 **jobs it creates will all be temporary, and therefore have no lasting impact on**
3 **the Missouri economy?**

4 **A.** My local union, Local 53, is primarily a construction local. This means that many
5 of the jobs we handle are temporary in nature. Yet this local has been in existence
6 for 100 years. Construction begets future construction. In this case, the building
7 of the first HVDC line is highly likely to lead to the building of future lines and
8 associated facilities to enhance the electronic grid and make it capable of
9 transmitting more renewable energy.

10 **Q. Do you have any recommendations to this Commission?**

11 **A.** On behalf of the International Brotherhood of Electrical Workers, AFL-CIO, and
12 IBEW Local Unions and 53 and 2, I recommend that the Commission grant Grain
13 Belt's Application.

14 **Q. Does that conclude your testimony?**

15 **A.** Yes.

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