

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

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

**ENERGY FOR GENERATIONS, LLC’S
PETITION FOR LEAVE TO APPEAR AND FILE BRIEF AS *AMICUS CURIAE***

COMES NOW Energy for Generations, LLC (“Energy for Generations” or “Petitioner”), pursuant to Commission Rule 4 CSR 240-2.075(11),¹ and for its Petition for Leave to Appear and File Brief as Amicus Curiae in support of the application of Grain Belt Express Clean Line LLC (“Grain Belt”), hereby states to the Missouri Public Service Commission (“Commission”) as follows:

1. Energy for Generations is a limited liability company organized under the laws of the State of Oklahoma. Energy for Generations is generally engaged in the business of developing, and encouraging development, of state-of-the-art wind power projects intended to generate, export, and sell renewable energy at prices lower than locally generated energy.

¹ Commission Rule 4 CSR-2.075(11) provides as follows:

(11) Any person not a party to a case may petition the commission for leave to file a brief as an *amicus curiae*. The petition for leave must state the petitioner’s interest in the matter and explain why an *amicus* brief is desirable and how the matters asserted are relevant to the determination of the case. The brief may be submitted simultaneously with the petition. Unless otherwise ordered by the Commission, the brief must be filed no later than the initial briefs of the parties and comply with all applicable briefing requirements. If leave to file a brief as an *amicus curiae* is granted, the brief shall be deemed filed on the date submitted. An *amicus curiae* may not file a reply brief.

2. Petitioner's principal offices are located at 4613 E. 91 Street, Tulsa, Oklahoma 74137. Please direct all correspondence, communications, orders, and any other documentation in this matter to:

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3. On August 30, 2016, Grain Belt filed an application with the Commission for a certificate of convenience and necessity to construct, own, operate, control, manage and maintain a high voltage, direct current transmission line and associated facilities within Buchanan, Clinton, Caldwell, Carroll, Chariton, Randolph, Monroe and Ralls Counties, Missouri, as well as an associated converter station in Ralls County.

4. Energy For Generations has an interest in this proceeding because it is a potential customer of the transmission line capacity and associated services for which Grain Belt seeks Commission authority in this docket. Further, issues related to renewable energy sources, such as wind power, and commerce involving renewable energy sources have significant benefits to the public and to the electric industry in Missouri and nationwide. In its brief, Energy for Generations will provide a more comprehensive industry perspective on such issues. Petitioner

asserts that the matters addressed in its brief in support of Grain Belt's application will aid the Commission in its assessment of the public interest standards to be applied to Grain Belt's request for a certificate of convenience and authority. Energy for Generations will not overburden the record with a lengthy brief, and instead intends to focus on supporting Grain Belt's demonstration that granting its application is in the public interest.

5. Energy for Generations hereby requests the Commission's leave and permission to file its *amicus curiae* brief no later than the date established for the filing of initial briefs in this matter.

WHEREFORE, Energy for Generations, LLC respectfully requests leave to file a brief in the above-captioned docket as an *amicus curiae*.

/s/ Anne E. Callenbach

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Attorneys for Energy for Generations, LLC

Certificate of Service

I hereby certify that a true and copy of the above and foregoing document was sent via electronic mail on this 10th day of April, 2017 to all parties on the Commission's official service list in this proceeding.

/s/ Anne E. Callenbach