

**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 )  
Construct, Own, Operate, Control, Manage )  
And Maintain a High Voltage, Direct Current ) Case No. EA-2014-0207  
Transmission Line and an Associated Converter )  
Station Providing an Interconnection on the )  
Maywood-Montgomery 345 kV transmission line. )

**POSITION STATEMENT OF  
ROCKIES EXPRESS PIPELINE LLC**

COMES NOW Rockies Express Pipeline LLC (“REX”), by and through counsel, and for its Position Statement states as follows:

1. *Does the evidence establish that the high-voltage direct current transmission line and converter station for which Grain Belt Express Clean Line LLC (“Grain Belt Express”) is seeking a certificate of convenience and necessity (“CCN”) are necessary or convenient for the public Service?*

REX takes no position on this issue.

2. *If the Commission grants the CCN, what conditions, if any, should the Commission impose?*

REX’s position on this issue is that the Commission should impose the recommendations outlined in the rebuttal testimony of REX witness, Robert Allen, and the schedule attached thereto, in order to ensure that the construction and operation of the Grain Belt Express HVDC line does not interfere with, or jeopardize the safety of, the existing REX 42-inch diameter natural gas pipeline in Missouri.

3. *If the Commission grants the CCN, should the Commission exempt Grain Belt Express from complying with the reporting requirements of Commission Rules 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D)?*

REX takes no position on this issue.

WHEREFORE, REX submits its Statement of Position regarding the issues in this matter pursuant to the Commission's Order Setting Procedural Schedule and Other Procedural Requirements issued June 18, 2014.

Respectfully submitted,

SMITH LEWIS, LLP

**/s/ Sarah E. Giboney**

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**Attorneys for Rockies Express Pipeline  
LLC**

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Rockies Express Pipeline LLC's Application for Intervention was served via electronic mail (e-mail) on this 7<sup>th</sup> day of November, 2014 on counsel for all parties of record.

**/s/ Sarah E. Giboney**

Sarah E. Giboney