

**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 345kV Transmission Line)

Case No. EA-2016-0358

IBEW UNIONS' STATEMENT OF POSITION

COME NOW, IBEW Local Union 2 and IBEW Local 53 (collectively, the "IBEW Unions"), through counsel, and for their Statement of Position as to the List of Issues for the above-referenced matter state as follows:

LIST OF ISSUES

1. Does the evidence establish that the Commission may lawfully issue to Grain Belt Express Clean Line LLC ("Grain Belt") the certificate of convenience and necessity ("CCN") it is seeking for the high-voltage direct current transmission line and converter station with an associated AC switching station and other AC interconnecting facilities?

Yes. The Commission may lawfully issue Grain Belt a CCN pursuant to Section 393.170 of the Missouri Revised Statutes.

2. Does the evidence establish that the high-voltage direct current transmission line and converter station for which Grain Belt is seeking a CCN are "necessary or convenient for the public service" within the meaning of that phrase in section 393.170, RSMo.?

Yes. Members of the IBEW Unions work with electricity and the demand for inexpensive, ecological energy on a daily basis. The IBEW Unions see the proposed high-voltage direct current transmission line and converter station as a necessary addition to the current energy sources in the Midwest. The Grain Belt Express plan also appears to be a convenient method of establishing a high-voltage direct current transmission line and converter

station because it ties in with existing infrastructure. Accordingly, Grain Belt Express should be granted the CCN it seeks.

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

The IBEW Unions take no position as to what conditions the Commission should impose on Grain Belt Express if the CCN is granted.

4. *If the Commission grants the CCN, should the Commission exempt Grain Belt 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)?*

The IBEW Unions take no position as to a potential waiver of the reporting requirements.

WHEREFORE, the IBEW Unions respectfully submit the foregoing Statement of Position for the Commission's consideration.

Respectfully submitted,

/s/ Emily R. Perez
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Certificate of Service

I certify that a true and correct copy of the foregoing document was served the parties to this case by email or U.S. Mail, postage prepaid, this 13th day of March, 2017.

/s/ Emily R. Perez