

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) Case No. EA-2014-0207
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”), submits the following to the Missouri Public Service Commission (“Commission”):

1. Energy for Generations is a limited liability company organized under the laws of the State of Oklahoma. Petitioner 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.

2. Petitioner’s principal offices are located at 4613 E. 91 Street, Tulsa, Oklahoma 74137. Correspondence, communications, orders and the decision in this matter should be addressed to:

¹ Commission Rule 4 CSR 240-2.075 (11) provides:

(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.

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3. On March 26, 2014, 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 Petitioner is a potential customer of the transmission line capacity and the other services for which Grain Belt seeks authority by this application to provide. Additionally, issues related to renewable energy sources, like power derived from wind, and commerce involving renewable energy sources are important to the public and to the electric power industry in Missouri and nationwide. In its brief, Energy for Generations can provide a broader industry perspective on such issues. Energy for Generations asserts that the matters addressed in its brief will assist the Commission in reaching a well-informed decision on the issues anticipated in this case.

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

WHEREFORE, Energy for Generations, LLC respectfully requests leave of the Commission to file a brief in the above-styled matter as an *amicus curiae*.

Respectfully submitted,

/s/ Mark W. Comley

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 25th day of April, 2014, to:

General Counsel's Office at staffcounsel@psc.mo.gov;
Nathan Williams at Nathan.williams@psc.mo.gov;
Office of Public Counsel at opcservice@ded.mo.gov;
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/s/ Mark W. Comley