

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

Grain Belt Express LLC for an)
Amendment to its Certificate of)
Convenience and Necessity Authorizing)
it to Construct, Own, Operate, Control,) File No. EA-2023-0017
Manage, and Maintain a High Voltage,)
Direct Current Transmission Line and)
Associated Converter Station)

**STATEMENT OF POSITION OF INTERVENOR
ASSOCIATED INDUSTRIES OF MISSOURI**

Associated Industries of Missouri pursuant to the procedural schedule established in this case and for its Statement of Position states as follows:

ISSUE 1

Does the evidence establish that the following amendments to the Certificate of Convenience and Necessity (“CCN”) held by Grain Belt Express LLC (“Grain Belt Express”) are “necessary or convenient for the public service” within the meaning of that phrase under section 393.170, RSMo:

- a. Relocating the Missouri converter station from Ralls County to Monroe County and increasing the capacity of the Missouri converter station from 500 MW to 2500 MW.
- b. Relocating the AC connector line (the “Tiger Connector”) from Ralls County to Monroe, Audrain, and Callaway Counties.
- c. Constructing the Project in two phases.
 - i. If the Commission determines that constructing the project in two phases is “necessary or convenient for the public service,” should the Commission approve a modification to the “Financing Conditions,” as set forth in Section I of Exhibit 1 to the Report & Order on Remand in Case No. EA-2016-0358, to

allow for constructing the Project in two phases?

Position of AIM

The evidence supports each of the amendments to the CCN currently held by Grain Belt Express and such amendments are in the best interest of the public and necessary and convenient for the public service. The Commission should approve the amendments.

ISSUE 2

Should the Commission approve a modification of the Landowner Protocols, as referenced and incorporated into the Report & Order on Remand in Case No. EA-2016-0358, to modify the compensation package offered to Tiger Connector landowners?

Position of AIM

The evidence supports the modification as proposed by Grain Belt in the testimony in this case and such modification is in the best interest of the State of Missouri, consumers in Missouri, and necessary and convenient for the public service. The Commission should approve the modification.

ISSUE 3

Should the Commission approve a modification of Ordering Paragraph 5 in the Report & Order on Remand in Case No. EA-2016-0358, such that easements obtained by means of eminent domain must be returned to the fee simple title holder if Grain Belt Express LLC does not satisfy the Financing Conditions within seven years, rather than five years, from the date that such easement rights are recorded with the appropriate county recorder of deeds?

Position of AIM

The evidence supports the modification and such modification is in the best interest of the State of Missouri, consumers in Missouri, and necessary and convenient for the public service. The Commission should approve the

modification.

ISSUE 4

If the Commission approves any or all of the foregoing amendments, what conditions, if any, should the Commission impose?

Position of AIM

The Commission should not impose any special or unique conditions to the amendments or modifications. AIM reserves the right to take positions in the future on any conditions proposed by parties at the hearing in this matter.

Other Issues

AIM does not take a position on any other issue at this time but reserves the right to do so as additional evidence is presented to the Commission and reserves the right to cross examine any witness on, and to brief, any issue.

Respectfully submitted,

ELLINGER BELL LLC

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon the parties listed on the official service list by email, this 30th day of May 2023.

/s/ Marc H. Ellinger _____