

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 )

**MR. FRANK B. COSTANZA’S, TRADEWIND ENERGY, INC.,  
SUPPLEMENTAL OBJECTIONS AND RESPONSES TO MISSOURI LANDOWNERS  
ALLIANCE’S SECOND SET OF DATA REQUESTS**

Frank B. Costanza (“**Mr. Costanza**”), TradeWind Energy, Inc. (“**TradeWind**”), supplements his response to Missouri Landowners Alliance’s Second Set of Data Requests, served October 1, 2014, as follows:

2.1 With respect to the over 1,000 MW of operating wind projects referred to in your testimony at page 1, lines 18-19, please provide the following information for each separate project or wind farm:

- (a) the location of each such project (closest city, and state).
- (b) the total nameplate capacity of the turbines at that site.
- (c) dates on which the first and last turbines were installed.
- (d) locations (by state) of all customers purchasing energy from the project over the past 12 months.
- (e) the contractual transmission path(s) used to deliver the energy to each customer buying energy from the project over the past 12 months.

**OBJECTIONS:** Mr. Costanza and TradeWind object because this data request is overbroad in scope because it seeks information regarding projects that have no relation to the proposed Grain Belt transmission line. Therefore, the data request seeks information that is not relevant to the proceeding and that is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, Mr. Costanza and TradeWind object because this data request seeks highly confidential and proprietary information that should not be produced. The information sought in this data request potentially includes trade secrets and confidential and proprietary technical, financial, business, research, and development information. In addition, this data request seeks information that was the subject of Missouri Landowners Alliance’s Motion to Compel, which was denied on September 24, 2014, and TradeWind’s Motions for Protective Order, which were granted

on September 24, 2014. As such, the information sought in this data request is protected from disclosure by the Public Service Commission's September 24, 2014 rulings.

Without waiving the objection,

Project	County	State	Project Size (MW)	Date of Operation	First Turbine Installed	Customer Location	Transmission Path
Smoky Hills I	Lincoln & Ellsworth	Kansas	100.8	Dec-08	Jul-07	KS	Busbar
Smoky Hills II	Lincoln & Ellsworth	Kansas	148.5	Dec-09	Jun-08	KS/MO	Busbar
Chisholm View	Grant & Garfield	Oklahoma	235.2	Dec-12	Jul-12	AL	Busbar
Caney River	Elk	Kansas	199.8	Dec-11	Jun-11	TN	Busbar
Rocky Ridge	Kiowa & Washita	Oklahoma	148.8	Jun-12	Feb-12	OK	Busbar
Buffalo Dunes	Grant & Haskell	Kansas	249.75	Dec 2013	Jun 2013	AL	Busbar

Dated: October 31, 2014

Respectfully Submitted,

DOUTHIT FRETTS ROUSE GENTILE &  
RHODES, LLC

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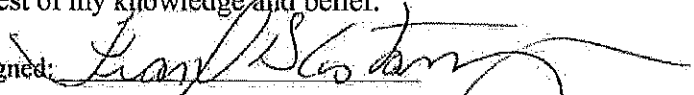
**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid this 31<sup>st</sup> day of October 2014.

/s/ Christopher L. Kurtz, Esq.  
Christopher L. Kurtz

**VERIFICATION OF RESPONSE**

The answers provided to Missouri Landowners Alliance's Second Set of Data Requests to Mr. Frank Costanza are true and accurate to the best of my knowledge and belief.

Signed: 

Position: EXEC. VICE PRESIDENT

TradeWind Energy, Inc.

Date: Oct 31, 2014