

**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) File No. EA-2016-0358
Voltage, Direct Current Transmission Line and an)
Associated Converter Station Providing an)
Interconnection on the Maywood - Montgomery)
345kV Transmission Line)

POSITION STATEMENT OF WALMART STORES, INC.

COMES NOW Walmart Stores, Inc. (“Walmart”) and respectfully submits its Position Statement in this matter.

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.?

Position: In its decision in the Tartan proceeding,¹ the Commission established five criteria by which it would consider future applications for a certificate of convenience and necessity. Specifically, those criteria are: (1) there must be a need for the service the applicant proposes to provide; (2) the proposed service must be in the public interest; (3) the applicant’s proposal must be economically feasible; (4) the applicant must have the financial ability to provide the service; and (5) the applicant must be qualified to provide the proposed service.

As reflected in the Rebuttal Testimony of Steve Chriss, Walmart only takes a position on the following two criteria from the Commission Tartan decision: (1) there must be a need for the service and (2) the service must promote the public interest.

(1) Need for the Service: As set forth in its application, the Grain Belt transmission project would provide three types of service. Specifically, the transmission project would: (1) provide for the potential delivery of 500 MWs of renewable energy from Ford County, Kansas to

¹ *In re Tartan Energy Co., LLC.*, 3 Mo.PSC3d 173, Case No. GA-94-127, at page 6.

a converter station in Ameren's service area; (2) provide for the potential delivery of 3,500 MWs of renewable energy from Ford County, Kansas to the PJM regional transmission organization footprint; and (3) provide for potential transmission of 500 MWs of off-system sales of Ameren energy to the PJM footprint.² Walmart believes that each facet of the Grain Belt proposal helps to meet a public need.³

Specifically, by allowing for the delivery of 500 MWs of renewable energy into Missouri, Grain Belt will help meet the demands of Missouri regulated utilities, cooperatives and municipalities interested in increasing their purchases of renewable energy. In addition, to the extent that commercial and industrial customers may be allowed in the future to directly arrange for the purchase of renewable energy, the Grain Belt project would allow for the transmission of such renewable wind energy. As such, entities like Walmart, that have made certain commitments to renewable energy and sustainability goals, may be better able to meet these commitments.

Furthermore, since many of these entities also have facilities in PJM, which currently provides the ability for customers to contract for renewable energy, the Grain Belt project will deliver renewable energy to customers that are currently operating in the PJM service area. Clearly then, the Grain Belt project will meet the demand for renewable energy both in Missouri as well as in the PJM footprint.

Finally, while transmitting as much as 500 MWs of renewable energy into Missouri, the Grain Belt project will then allow for the sale and transmission of Ameren energy into the PJM footprint. Certainly the availability of additional markets for the sale of Ameren energy should

² Chriss Rebuttal, page 5 (citing to Berry Direct, page 4).

³ See, Chriss Rebuttal, pages 5-9.

increase the opportunity for off-system sales and allow for the potential to reduce Ameren's cost of service.

(2) The Proposed Service Must be in the Public Interest:

For many of the same reasons that the Grain Belt proposal meets a public need, it also serves the public interest. Specifically, the Grain Belt project will allow for the delivery of renewable energy into Missouri and the PJM footprint while also providing for a new market for the sale of Ameren off-system energy. Furthermore, the delivery of renewable energy in Missouri can help drive economic development in the state as well as providing the opportunity for reduced costs to Missouri customers.⁴

WHEREFORE, Walmart prays that the Commission accepts this Statement of Positions and issues its order consistent with its positions.

Respectfully submitted,

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ATTORNEY FOR WALMART STORES, INC.

⁴ Chriss Rebuttal, pages 9-10.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

/s/ David Woodsmall
David Woodsmall

Dated: March 13, 2017