

**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-2016-0358
Current Transmission Line and an Associated)
Converter Station Providing an Interconnection on the)
Maywood - Montgomery 345kV Transmission Line.)

**STATEMENT OF POSITION
OF RENEW MISSOURI**

COMES NOW Renew Missouri Advocates (“Renew Missouri”), by and through its undersigned counsel, and for its Statement of Position in this case states the following:

Issue I: 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?

Position: Yes, Renew Missouri believes that Grain Belt Express Clean Line LLC (“Grain Belt”) has met the requirements to be granted a CCN. Additionally any deficiencies may be waived by the Commission for good cause shown.

Issue II: 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: Renew Missouri believes that Grain Belt’s proposal meets the Tartan Factors and therefore is “necessary or convenience for the public services” within the meaning of that phrase in section 393.170 as interpreted by current caselaw. There is clearly a need for this

service. 200MW have already been purchased by Missouri utilities. Additionally, there are a myriad of Missouri businesses who would like to increase the amount of renewable energy they purchase and are currently unable to do so.

As Grain Belt has illustrated, this project is economically feasible. Missouri utilities have already committed to purchase the resulting power in part for economic reasons. However, it is important to note that this is not a typical CCN case and therefore this factor should not be analyzed in the same way as it is in other CCN application. A typical CCN application involves a public utility, which passes its costs on to ratepayers through rates. In this case, Grain Belt is not a typical utility with ratepayers. The underlying point in addressing economic feasibility is to ensure that that fiscally irresponsible projects do not get included in the rate base and that necessary public utilities do not stop providing services because they no longer have the financial ability to do so. Here however, Grain Belt is being funded through private means. Therefore, there isn't the danger of rates becoming burdensome to consumers due to an economically infeasible project. Additionally, if through some unforeseen and improbable series of events, Grain Belt ceases to exist, no entity will be without power.

While it is clear that Grain Belt meets the economic feasibility factor, and it is also clear that this will be a point of some contention in this proceeding. The Commission should bear in mind the unique nature of this undertaking.

The public interest will be served in this case, as lower rates, economic development and increased air quality from reduced emissions may all result from approval.

Issue III: If the Commission grants the CCN, what conditions, if any, should the Commission impose?

Position: Renew Missouri takes no position on this issue at this time and reserves the right to assert a position later in this proceeding.

Issue IV: *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)?*

Position: Renew Missouri takes no position on this issue at this time. Renew Missouri reserves the right to assert a position later in this proceeding.

Respectfully Submitted,

/s/ Andrew J. Linhares

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ATTORNEY FOR RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was mailed, faxed, or emailed to all counsel of record on this 13th day of March 2017.

/s/ Andrew J. Linhares

Andrew J. Linhares