

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

Case No. EA-2014-0207

MOTION TO CORRECT TESTIMONY

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and hereby moves the Commission allow Staff to correct the pre-filed rebuttal testimony of Staff witness Michael L. Stahlman as follows:

1. The following question and answer appears on lines 1-13 of page 18 of the rebuttal testimony of Staff witness Michael L. Stahlman that Staff prefiled on September 15, 2014:

1 Q. Which of Staff's recommended conditions do you recommend the Commission
2 include in any order approving Grain Belt Express' Proposal?

3 A. Staff recommends the Commission grant Grain Belt Express' request for a
4 Certificate of Convenience and Necessity, Staff recommends the grant be conditioned on the
5 completion and making public of all RTO interconnection studies with the Missouri converter
6 station at 1000 MW and with the potential for exporting energy from the MISO and the PJM,
7 and importing energy into the SPP with an opportunity for parties to review the studies and
8 bring issues before the Commission, prior to Grain Belt Express commencing any eminent
9 domain proceedings in Missouri.

10 Additionally, Staff recommends that the Commission condition Grain Belt Express
11 commencing any eminent domain proceedings to after the actual construction of at least 25%
12 of the completed cost, excluding engineering, planning, and land purchase costs, of the
13 Missouri converter station.

2. The corrections to lines 3 and 4 follow:

3 A. Staff recommends **that if** the Commission grants Grain Belt Express' request
for a
4 Certificate of Convenience and Necessity, ~~Staff recommends~~ the grant be conditioned on the

3. Therefore, as corrected, the question and answer are:

1 Q. Which of Staff's recommended conditions do you recommend the Commission
2 include in any order approving Grain Belt Express' Proposal?

3 A. Staff recommends that if the Commission grants Grain Belt Express' request
for a
4 Certificate of Convenience and Necessity, the grant be conditioned on the
5 completion and making public of all RTO interconnection studies with the Missouri converter
6 station at 1000 MW and with the potential for exporting energy from the MISO and the PJM,
7 and importing energy into the SPP with an opportunity for parties to review the studies and
8 bring issues before the Commission, prior to Grain Belt Express commencing any eminent
9 domain proceedings in Missouri.

10 Additionally, Staff recommends that the Commission condition Grain Belt Express
11 commencing any eminent domain proceedings to after the actual construction of at least 25%
12 of the completed cost, excluding engineering, planning, and land purchase costs, of the
13 Missouri converter station.

WHEREFORE, Staff moves the Commission to allow it to correct the
pre-filed rebuttal testimony of Staff witness Michael L. Stahlman as set forth above.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy Staff Counsel
Missouri Bar No. 35512
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)
nathan.williams@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 6th day of October, 2014.

/s/ Nathan Williams