

**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) Case No. EA-2016-0358
Transmission Line and an Associated Converter)
Station Providing an Interconnection on the)
Maywood-Montgomery 345 kV transmission line.)

**POSITION STATEMENT OF
ROCKIES EXPRESS PIPELINE LLC**

COMES NOW Rockies Express Pipeline LLC (“REX”), by and through counsel, and for its Position Statement states as follows:

- 1. 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?***

REX takes no position on this issue.

- 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.?***

REX takes no position on this issue.

- 3. If the Commission grants the CCN, what conditions, if any, should the Commission impose?***

In order to ensure that Grain Belt Express’ HVDC Project is not designed, constructed or operated in a manner that poses a risk to the safety or integrity of Rockies Express Pipeline LLC’s 42-inch high pressure natural gas pipeline (the “REX’s Pipeline”), if the Commission grants the CCN, the Commission should impose the following conditions on Grain Belt Express:

- a. Grain Belt Express must promptly notify REX when Grain Belt Express’ final route alignment and structure spotting exercises are completed, and must advise REX in advance of the engineering commencement date on which Grain Belt Express expects

significant engineering activities will commence.

- b. Provided REX executes appropriate confidentiality agreements, Grain Belt Express must provide technical and operational information concerning its HVDC Project, so that REX may study how the HVDC Project may impact the safety or integrity of REX's Pipeline.
- c. Grain Belt Express must collaborate with REX to study how the HVDC Project might impact the safety or integrity of REX's Pipeline.
- d. Grain Belt Express must pay the costs of installing and operating such monitoring and testing equipment, and mitigation measures, as REX's pipeline safety engineers, using reasonable engineering judgment, determine are required under applicable regulations and accepted pipeline safety practices, in order to safeguard REX's Pipeline from potential adverse effects of the HVDC Project, provided such measures are commercially reasonable.
- e. Grain Belt Express is responsible for any direct damages to REX proximately caused by the construction and operation of the HVDC Project, including damage from fault currents.

4. 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)?

REX takes no position on this issue.

WHEREFORE, REX submits its Position Statement regarding the issues in this matter pursuant to the Commission's Order Setting Supplemental Procedural Schedule and Other Procedural Requirements issued October 24, 2018.

Respectfully submitted,

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LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Rockies Express Pipeline LLC's Position Statement was served via electronic mail (e-mail) or via regular mail on this 13th day of December, 2018 on counsel for all parties of record.

/s/ Sarah E. Giboney
Sarah E. Giboney