

**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 345kV transmission)
line.)**

Case No. EA-2016-0358

**REPLY OF GRAIN BELT EXPRESS TO RESPONSE OF
MISSOURI LANDOWNERS ALLIANCE**

Grain Belt Express Clean Line LLC (“Grain Belt Express” or “Company”) provides the following Reply to the Response of the Missouri Landowners Alliance (“MLA”), filed October 6, 2016, which addressed scheduling issues now before the Commission.

1. Commission Staff filed Proposed Procedural Schedules and Procedures on October 5, 2016 which presented two alternative schedules. The Grain Belt Express Alternative called for local public hearings in December; for the final round of testimony to be filed on January 19, 2017; and an evidentiary hearing to occur the week of March 20, 2017. This Alternative proposed that all briefing, as well as proposed findings of fact and conclusions of law be submitted by April 25, 2017.

2. Eleven other parties endorsed this proposal, including the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), Infinity Wind Power, Wal-Mart Stores, Inc., and Rockies Express Pipeline LLC. These eleven parties suggested that the Commission could issue a report and order by May 15, 2017, fully understanding that there is no operation of law date in this case.

3. The Grain Belt Express Alternative is not an expedited schedule. To the contrary, this Alternative simply reflects the fact that the Commission and most of the parties are familiar with the issues that were heard in the Company's first case, No. EA-2014-0207, and that new facts and developments should be the focus of this proceeding. These new facts are summarized in Paragraphs 4 and 5 of the Application, which was originally filed on June 30, 2016 with Direct Testimony, and re-filed in virtually identical form on August 30, as directed by the Commission.

4. Whereas the Company's first case presented eight direct testimony witnesses, this case presents 15 witnesses, including several witnesses who testify on subjects that were not introduced by Grain Belt Express until its surrebuttal testimony in the last case. Given that the Company has presented more facts at an earlier stage in this case, scheduling the evidentiary hearing to begin on March 20 (almost seven months after the August 30, 2016 filing) poses no inconvenience for any party.

5. The only parties opposed to the Company's schedule are landowners and the Missouri Farm Bureau Federation. However, it is the Company's understanding that the local public hearing dates proposed by Grain Belt Express (December 5-9 and December 12-13) accommodated the request of the Farm Bureau.

6. MLA expresses concerns regarding Staff's suggestion that Ameren Missouri be joined as a party to this proceeding. However, MLA does not address the interconnection issue which was the basis of Staff's pleading, but rather refers to "Ameren's plans for meeting its RES [renewable energy standard] requirements." See MLA Response at 3. Because the Grain Belt Express Application stated that MJMEUC will be a major customer of the Project through a 225 MW transmission service agreement, issues related to Ameren's ability to meet the requirements of Missouri's RES will likely not be a major issue in this case.

7. In light of the foregoing, and especially the fact that eleven (11) other parties with different interests support the Grain Belt Express Alternative, the Company believes that it presents the best schedule for the Commission to adopt.

Respectfully submitted,

/s/ Karl Zobrist

Karl Zobrist MBN 28325
Joshua K.T. Harden MBN 57941
Dentons US LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111
(816) 460-2400
(816) 531-7545 (fax)
karl.zobrist@dentons.com
joshua.hardens@dentons.com

Cary J. Kottler
General Counsel
Erin Szalkowski
Corporate Counsel
Clean Line Energy Partners LLC
1001 McKinney Street, Suite 700
Houston, TX 77002
(832) 319-6320
ckottler@cleanlineenergy.com
eszalkowski@cleanlineenergy.com

Attorneys for Grain Belt Express Clean Line LLC

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served by email on all counsel of record this 14th day of October 2016.

/s/ Karl Zobrist

Attorney for Grain Belt Express Clean Line LLC