

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-2014-0207  
Current Transmission Line and an Associated Converter )  
Station Providing an interconnection on the Maywood- )  
Montgomery 345 kV Transmission Line )

**TRADEWIND ENERGY, INC.’S POST-HEARING BRIEF**

TradeWind Energy, Inc. (“TradeWind”), pursuant to the Notice of Actions Taken at Evidentiary Hearing, issued November 24, 2014, timely submits this post-hearing brief.

- 1. Does the evidence establish that the high-voltage direct current transmission line and converter station for which Grain Belt Express Clean Line LLC (“Grain Belt Express”) is seeking a certificate of convenience and necessity (“CCN”) are necessary or convenient for the public service?**

Based on the evidence before the Public Service Commission, TradeWind supports the proposed Grain Belt Express transmission line and converter station because Grain Belt Express has satisfied the Tartan Factors that the Public Service Commission must consider in making its decision. More specifically, a need exists for the proposed Grain Belt transmission line, Grain Belt Express is qualified to provide the transmission of wind energy through its proposed line and converter station, the proposal is economically feasible, and the growth of wind energy is in the best interests of the public. As a renewable energy development company, headquartered in the Kansas City Metropolitan Area, that develops wind and solar energy throughout the Great Plains, TradeWind is familiar with the wind energy market, including the current market limitations, the need for growth, and the potential benefits of wind energy.

Wind energy has the potential to deliver low cost clean renewable electricity to customers in the Great Plains’ region, including Missouri, and electric energy customers in other regions of

the United States. TradeWind believes that a demand exists for clean energy in the markets in Missouri and east of the Mississippi river and that the demand will continue in the future. Currently, limited capacity exists to transmit wind energy from the Great Plains to markets in Missouri and east of the Mississippi river. The proposed Grain Belt transmission line addresses the existing capacity limitation on the transportation of wind energy, and permits the transportation of wind energy outside the Southwest Power Pool Regional Transmission Organization (“SPP RTO”) region. Approval of the Grain Belt CCN would provide an electric conveyance system capable of moving wind energy from the robust wind-generating Great Plains to markets in Missouri and east of the Mississippi river, where low cost clean wind energy is not readily available.

The construction of the proposed Grain Belt Express transmission line will produce economic benefits to Missouri. In addition, Missouri will benefit because the converter station will allow low cost energy to be delivered to Missouri. Moreover, the proposed Grain Belt transmission line will address existing technology and congestion issues present within the existing SPP RTO system and promote competition in the marketplace. Furthermore, the proposed Grain Belt transmission line will benefit the production of wind energy by eliminating the significant electric energy loss that is attendant to alternating current lines and eliminating the significant congestion pricing risk that is posing issues for energy delivery from the western areas of the existing RTO grids where wind energy is best situated. Finally, the proposed Grain Belt transmission line will accommodate future growth into new markets that do not have the ability to build cost effective wind projects in their own region.

Based on the information provided by Grain Belt throughout this proceeding, it appears that the proposed transmission line and converter station are economically feasible and that

Grain Belt is qualified to provide transmission of wind energy over the transmission line and converter station. TradeWind believes that Grain Belt can provide a viable cost competitive alternative to using the SPP RTO for energy transport.

For these reasons, TradeWind supports the approval of the CCN for Grain Belt.

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

TradeWind supports the conditions that Grain Belt Express has stated that it will accept.

**3. If the Commission grants the CCN, should the Commission exempt Grain Belt Express 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)?**

TradeWind takes no position on this issue.

Dated: December 8, 2014

Respectfully Submitted,

DOUTHIT FRETS ROUSE GENTILE &  
RHODES, LLC

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid this 8<sup>th</sup> day of December 2014.

/s/ Christopher L. Kurtz, Esq.  
Christopher L. Kurtz