

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Grain Belt)
Express LLC for an Amendment to its Certificate)
of Convenience and Necessity Authorizing it to)
Construct, Own, Operate, Control, Manage, and)
Maintain a High Voltage, Direct Current)
Transmission Line and Associated Converter)
Station)
)

Case No.: EA-2023-0017

POSITION STATEMENT of CLEAN GRID ALLIANCE

Clean Grid Alliance files this Position Statement pursuant to the Missouri Public Service Commission’s *Order Amending Procedural Schedule*, dated April 3, 2023.

Statement of Position on the Issues

1. *Does the evidence establish that the following amendments to the Certificate of Convenience and Necessity (“CCN”) held by Grain Belt Express LLC (“Grain Belt Express”) are “necessary or convenient for the public service” within the meaning of that phrase under section 393.170, RSMo:*

- a. *Relocating the Missouri converter station from Ralls County to Monroe County and increasing the capacity of the Missouri converter station from 500 MW to 2500 MW.*
- b. *Relocating the AC connector line (the “Tiger Connector”) from Ralls County to Monroe, Audrain, and Callaway Counties.*
- c. *Constructing the Project in two phases.*
 - i. *If the Commission determines that constructing the project in two phases is “necessary or convenient for the public service,” should the Commission approve a modification to the “Financing Conditions,” as set forth in Section I of Exhibit 1 to the Report & Order on Remand in Case No. EA-2016-0358, to allow for constructing the Project in two phases?*

Yes. Grain Belt Express LLC has a certificate of public convenience and necessity for this Project , which was granted by the Commission in the *Report and Order on*

Remand issued on March 20, 2019 in case number EA-2016-0358. For the HVDC portion of the line, no material changes to the route, right-of-way, or facility design were made as a result of the requested amendments.¹ The requested amendments and potential for more solar resources using the project provide more benefits to Missouri; increasing the Certificated Project's public interest benefits. New Memorandums of Understanding with major commercial, industrial customers, and electric utilities for the Project's transmission capacity indicate need for the Project. Moreover, Ameren Missouri and Evergy's integrated resource plans indicate need for renewable resources, which the Project could fulfill after the amendments are approved.

CGA's testimony supports the finding that the Project meets the "*Tartan Factors*" the Commission uses to assess certificate of convenience and necessity applications. CGA witness Goggin's testimony addresses the three following "*Tartan Factors*":

1. There must be a need for the service;
2. The applicant's proposal must be economically feasible; and
3. The service must promote the public interest.

Moreover, CGA believes the Project with its amendments meets all 5 of the "*Tartan Factors*" and is, therefore, necessary or convenient for public service.

CGA witness Goggin's testimony explains how the Grain Belt Express Project meets the three aforementioned factors through the delivery of greater amounts of low-cost renewable energy resources to Missouri consumers. This low-cost renewable energy, relative to other in-state options and options from within MISO, helps Missouri meet its need for low-cost electricity, makes the project economically feasible, and

¹ Application to Amend Existing Certificate of Public Convenience and Necessity, at ¶18 (8/24/2022).

promotes the public interest. By improving electric reliability and resilience, the Project also promotes the public interest and meets the need for reliable electricity from Missouri utilities, ratepayers, and other electricity purchasers. The Project promotes reliability and resilience primarily by increasing the ability to transfer power among the three main grid operators that serve Missouri: the Southwest Power Pool (“SPP”), the Midcontinent ISO (“MISO”), and Associated Electric Cooperative Inc. (“AECI”), and to import power from the PJM grid operator to the East. The delivery of renewable energy via the Project also reduces the emissions of a range of pollutants, which benefits the public interest and meets the need for generation resources that reduce the cost of complying with federal regulations that limit emissions of those pollutants.

2. Should the Commission approve a modification of the Landowner Protocols, as referenced and incorporated into the Report & Order on Remand in Case No. EA-2016-0358, to modify the compensation package offered to Tiger Connector landowners?

Clean Grid Alliance does not take a position on this issue.

3. Should the Commission approve a modification of Ordering Paragraph 5 in the Report & Order on Remand in Case No. EA-2016-0358, such that easements obtained by means of eminent domain must be returned to the fee simple title holder if Grain Belt Express LLC does not satisfy the Financing Conditions within seven years, rather than five years, from the date that such easement rights are recorded with the appropriate county recorder of deeds?

Clean Grid Alliance does not take a position on this issue.

4. If the Commission approves any or all of the foregoing amendments, what conditions, if any, should the Commission impose?

Clean Grid Alliance does not take a position on this issue.

Respectfully submitted,

/s/ Sean R. Brady

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CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on May 30, 2023.

/s/ Sean R. Brady

Attorney for Clean Grid Alliance