

**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. )  
)  
) File No. EA-2023-0017  
)  
)  
)

**RENEW MISSOURI’S STATEMENT OF POSITIONS**

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”) and offers the following Statement of Positions:

**Issue 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:**

*Sub-issue 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.*

*Sub-issue B: Relocating the AC connector line (the “Tiger Connector”) from Ralls County to Monroe, Audrain, and Callaway Counties.*

Renew Missouri Position: The evidence supports a Commission finding that the proposed amendments are necessary and convenient for the public service. Grain Belt Express, Sierra Club, the Missouri Electric Commission, Clean Grid Alliance, and Staff all provide credible analysis supporting the need for the Amended Project on a local, state, and national level. The proposed amendments will provide Missouri with access to clean, low-cost, and reliable energy<sup>1</sup> while alleviating congestion on the grid<sup>2</sup> and promoting more coordination in resource planning.<sup>3</sup> The Amended Project will further serve the growing demand for renewable energy amongst the state’s

---

<sup>1</sup> EFIS File No. EA-2023-0017, Doc. No. 135: Rebuttal Testimony of Michael Goggin.

<sup>2</sup> EFIS File No. EA-2023-0017, Doc. No. 129: Rebuttal Testimony of Michael Milligan.

<sup>3</sup> *Id.*

municipal utilities while lowering marginal energy costs within the MISO footprint, allowing the municipal utilities to save money.<sup>4</sup> Finally, the proposed amendments promote the Commission’s established interpretation of the public interest by allowing even greater access to economical renewable energy sources that provide safe, reliable, and affordable service while reducing the amount of carbon dioxide released into the atmosphere.<sup>5</sup>

*Sub-issue C: Constructing the Project in two phases.*

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

*Sub-issue C(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?*

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**Issue 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?**

Renew Missouri Position: Yes. The proposed modification of the compensation package set forth in the Landowner Protocols is consistent with the provisions of House Bill 2005 resulting from extensive negotiations between opposing parties. Grain Belt’s proposed modification complies with the intent of the Legislature and provide landowners with appropriate compensation despite the fact this Application to Amend was filed before HB 2005 became law.

**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,**

---

<sup>4</sup> EFIS File No. EA-2023-0017, Doc. No. 132: Rebuttal Testimony of John Grotzinger.

<sup>5</sup> EFIS File No. EA-2023-0017, Doc. No. 162: Surrebuttal Testimony of James Owen.

**from the date that such easement rights are recorded with the appropriate county recorder of deeds?**

Renew Missouri Position: Yes. Similarly to the modification described above, this proposed modification is consistent with the provisions of HB 2005 and furthers the intent of the Legislature through terms negotiated at length with interested parties.

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

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

WHEREFORE, Renew Missouri submits its *Statement of Positions*.

Respectfully submitted,

/s/ Alissa Greenwald

Alissa Greenwald, Mo. Bar No. 73727  
P.O. Box 413071  
Kansas City, MO 64141  
T: (913) 302-5567  
alissa@renewmo.org

/s/ Andrew Linhares

Andrew Linhares, Mo. Bar No. 63973  
3115 S. Grand Blvd, Suite 600  
St. Louis, MO 63118  
T: (314) 471-9973  
andrew@renewmo.org

*Attorneys for Renew Missouri*

Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 30<sup>th</sup> day of May 2023:

**/s/ Alissa Greenwald**

---