

Exhibit No.:  
Issues: Public Comment Summary  
Witness: Natelle Dietrich  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Rebuttal Testimony  
Case No.: EA-2014-0207  
Date Testimony Prepared: September 15, 2014

**MISSOURI PUBLIC SERVICE COMMISSION**

**REGULATORY REVIEW DIVISION**

**REBUTTAL TESTIMONY**

**OF**

**NATELLE DIETRICH**

**GRAIN BELT EXPRESS CLEAN LINE LLC**

**CASE NO. EA-2014-0207**

*Jefferson City, Missouri  
September 2014*





Rebuttal Testimony of  
Natelle Dietrich

1 and am currently the lead director on activities related to transmission issues, environmental  
2 compliance issues and revising the Commission's renewable energy standard regulations.  
3 Relevant activities relate to general transmission issues, Missouri 111(d) compliance efforts,  
4 energy efficiency, demand side management, demand response and smart grid. I was a  
5 member of the Missouri Delegation to the Missouri/Moldova Partnership through NARUC  
6 and the US Agency for International Development.

7 I am a member of the National Association of Regulatory Utility Commissioners Staff  
8 Subcommittee on Telecommunications, and in that capacity I have served as First Vice Chair  
9 and assisted on the Federal Legislation Subgroup. I serve on the Staff of the Federal/State  
10 Joint Board on Universal Service, as lead Staff for the Missouri Universal Service Board and  
11 was a member of the Governor's MoBroadbandNow taskforce.

12 Q. Have you previously testified before the Commission?

13 A. Yes. My Case Summary is attached as Attachment ND-1.

14 Q. What is the purpose of your testimony?

15 A. The purpose of my testimony is to provide a high level summary of the written  
16 public comments submitted to the Commission's Electronic Filing and Information System  
17 ("EFIS") in response to the Grain Belt Express request for a certificate of convenience and  
18 necessity authorizing it to construct, own, operate, control, manage, and maintain electric  
19 transmission facilities within Buchanan, Clinton, Caldwell, Carroll, Chariton, Randolph,  
20 Monroe and Ralls Counties, as well as an associated converter station in Ralls County. The  
21 summary will not include a summary of comments submitted to the docket sheet via  
22 testimony or other filings and will not address comments made at the local public hearings.

23 Q. How many public comments were submitted to EFIS?

Rebuttal Testimony of  
Natelle Dietrich

1           A.     As of September 14, 2014, there are approximately 7,160 public comments in  
2 EFIS. It should be noted that the EFIS field “Total Public Comment(s)” indicates there are  
3 3,663 comments; however, there are petitions with approximately 3,500 signatures that were  
4 entered as batches so the additional 3,500 comments are not reflected in the “Total” field of  
5 EFIS.

6           Q.     Can you provide an estimate of the number of comments that support the  
7 request versus the number of comments that are opposed to the request?

8           A.     Yes, I can provide an estimate. EFIS does not have an easy way to sort the  
9 comments by “support” or “against”; however, I have reviewed all the comments submitted in  
10 the case file. Based on that review, I would estimate there are approximately 60 comments  
11 providing support for the request, and over 7,100 opposed to the request. Without providing  
12 any commentary on the positions put forth in the comments, the reasons presented for the  
13 positions will be summarized later in my testimony.

14          Q.     You state there are approximately 7,160 comments in EFIS. Are any of the  
15 comments submitted in EFIS duplicate comments?

16          A.     Yes. It is difficult to specifically quantify the number of duplicate comments  
17 in the case, especially since some are contained in batch entries; however, as previously  
18 stated, I have reviewed all the comments so I can provide some general information regarding  
19 duplicate entries. Most, if not all, duplicate comments are comments opposing the request.  
20 Some of the comments were submitted to Commissioners, as well as to OPC, the  
21 Commission’s Data Center or the Commission’s Consumer Services Unit. Therefore, some  
22 comments are entered into EFIS multiple times depending on how they were received and  
23 submitted to EFIS. In some instances, the same comments were also entered as extra

Rebuttal Testimony of  
Natelle Dietrich

1 communication contacts on the docket sheet. One commenter sent a letter to several members  
2 of Staff. The letters were entered into EFIS, so they represent duplicate comments. Some  
3 commenters signed petitions that were individually entered under each signatory name, and  
4 also signed a petition that was entered as a batch in EFIS. Some commenters submitted one  
5 comment, which was signed by multiple family members. For instance, Joe Smith and Mary  
6 Smith sign the same comment. This comment is entered into EFIS under “Joe Smith” and  
7 also under “Mary Smith”. This may be considered by some as a duplicate comment. Finally,  
8 there were people at the local public hearings (“LPH”) that indicated they had previously  
9 submitted written comments to the Commission, but they also submitted a comment card at  
10 the LPH.

11 Q. You state “petitions” are entered as public comments. Can you describe the  
12 petitions?

13 A. Yes. The petitions are signed by multiple individuals. Signatories live in the  
14 affected areas, other parts of the state, and other parts of the country such as Arizona, Texas,  
15 Florida and Maryland. It is not known whether the signatories from other states are  
16 landowners in Missouri, or just generally opposed to requests of this nature. Petition  
17 language is similar to the following:

18 We, the undersigned, hereby oppose the private, for profit corporation  
19 Grain Belt Express Clean Line, and request that Missouri Public Service  
20 Commission DENY approval of their application to become a public utility,  
21 allowing them the authority of eminent domain. The proposed high voltage  
22 direct current lines have no proven benefit to the residents of the State of  
23 Missouri in either transmitting or receiving energy for our state. If  
24 constructed, these towers and high voltage transmission lines would  
25 significantly decrease property values on potentially thousands of properties;  
26 cause a loss of productive farmland; scar  
27

Rebuttal Testimony of  
Natelle Dietrich

1 the landscape forever; negatively impact hunting, recreation and agritourism;  
2 and could cause serious health effects, according to some studies.

3 Sincerely,

4 Petitions were also submitted on behalf of the Amish community with language as follows:

5 The people signing this document are members of the Amish  
6 community of Randolph, Monroe and Audrain Counties, Missouri. We are  
7 opposed to Grain Belt Express Clean Line's ("Grain Belt") proposed electric  
8 transmission line crossing our community or anywhere else in Missouri. We  
9 ask you to deny Grain Belt's application for public utility status.

10 Respectfully,

11 Q. Are there other types of comments submitted in EFIS?

12 A. Yes. In addition to the petitions, there are comment cards and letters that  
13 appear to be "form" cards or "form" letters. More specifically, there are several comment  
14 cards that state:

15 Dear Commissioners,

16 I am a resident of \_\_\_\_\_ County. I am adamantly opposed to  
17 the Grain Belt Express transmission line and urge you to deny them Public  
18 Utility status. Missourians do not need the electricity and would not benefit  
19 from it. It would violate our property rights, reduce property values far more  
20 than compensation, spoil our rural landscape, cause hundreds of acres of  
21 deforestation, create obstacles to farming, limit future land use options, and  
22 cause potential health risks for humans, livestock, and wildlife. Thank you!

23 Respectfully, \_\_\_\_\_  
24

25 For this type of comment, the commenter enters his/her county name, signs the card  
26 and mails it to the Commission for entry into EFIS.

27 There are also "form" letters that support the request and "form" letters that ask the  
28 Commission to deny the request. For instance, the "form" letter in support of the request  
29 contains the following:

30 Dear Honorable Chair and Commissioners,

31 I am writing to support new transmission line projects that will strengthen our  
32 regional electric grid, create new jobs, and provide our region and nation with  
33 competitively priced clean energy.  
34

Rebuttal Testimony of  
Natelle Dietrich

1 Our nation needs new and cost-effective clean energy. Unfortunately, there is  
2 not enough transmission infrastructure to connect the lowest-cost wind  
3 resources to communities and cities across our region that have a strong  
4 demand for renewable power. With pending retirements of many older power  
5 plants, additional renewable energy supplies and transmission are needed for  
6 Missouri, our region, and our nation.  
7

8 The Grain Belt Express Clean Line and the various MISO Multi-Value  
9 Projects throughout the region are striving to address this problem. These  
10 projects will collect and deliver enough energy from new wind projects in the  
11 surrounding region to power millions of homes.  
12

13 In addition to providing needed energy, these projects will boost Missouri's  
14 wind energy and transmission supply chain, contribute new tax revenues across  
15 the state, and provide new job growth opportunities. New transmission lines  
16 will enable Missouri to be a leader in utilizing low-cost, clean wind energy.  
17

18 I support transmission projects that are being developed to foster more wind  
19 energy production. I encourage you to support the regulatory approvals  
20 required for these projects to move forward.  
21

22 Sincerely,  
23

24 "Form" letters opposing the request contain the following language:  
25

26 I am writing in regards to case no. EA-2014-0207. I am very much **opposed** to  
27 the Grain Belt Express Clean Line transmission line and ask that you please  
28 **DENY** them Public Utility status. Missourians do not need the electricity and  
29 would not benefit from it. It would violate our property rights, reduce our  
30 property value far more than compensation, spoil our rural landscape, cause  
31 hundreds of acres of deforestation, create obstacles to farming, limit future  
32 land use options, and cause potential health risks to human and livestock.  
33

34 Thank you!

35 Respectfully,

36 Your name

Your name and address

37 Q. Are there any comments in EFIS that are not "form" letters or petitions?

38 A. Yes. There are also "non-form-letter" comments submitted by legislators,  
39 county commissioners, and individuals. Comments in support of the request cite reasons that  
40 include: economic development opportunities for the area and the State; increased tax revenue  
41 for the county or school district; availability of jobs to the area; and, a means for improving



Rebuttal Testimony of  
Natelle Dietrich

1 the environment or providing low-cost “clean” wind energy from western Kansas to  
2 population centers in Missouri and farther east. Comments in opposition to the request cite  
3 reasons such as: violations of individual landowner property rights related to utility  
4 status/eminent domain issues; unknown health concerns associated with a direct current  
5 (“DC”) transmission line, or a transmission line of the request size; safety concerns since  
6 there are natural gas pipelines in the area or since the area is subject to ice storms and  
7 tornadoes; no clear direct benefit to Missouri; the benefits do not outweigh the concerns; the  
8 long-term impact to the beauty and landscape of Missouri; the effect on crops or livestock;  
9 and, the effect on GPS, cell phones, farming processes or technologies in the area.

10 Comments from many of the county commissioners indicate they were originally  
11 supportive of the request, but because of questions that have since been raised and remain  
12 unanswered, the county commissioners have rescinded their support of the request.

13 There are comments suggesting questionable outreach activities by Grain Belt Express  
14 representatives. For instance, a couple comments indicated the commenters were represented  
15 in public documents as supporting the request because they had signed what they thought was  
16 an attendance sheet at a Grain Belt Express meeting. The comments requested the  
17 Commission not consider them as supporting the request.

18 Finally, there are a couple comments indicating that Grain Belt Express  
19 representatives had contacted elderly landowners telling them to “sign” because all of their  
20 neighbors had “signed”.

21 Q. Did Staff investigate the various issues, whether positive or negative, raised in  
22 the comments?

Rebuttal Testimony of  
Natelle Dietrich

1           A.     Yes. Other Staff witnesses address many of the issues raised in comments and  
2 suggest conditions, where appropriate, to alleviate those concerns.

3           Q.     Does this complete your testimony?

4           A.     Yes it does.

**Natelle Dietrich**  
**Case Summary**

Presented testimony or analysis through affidavits on the following cases and proceedings:

- Case No. TA-99-405, an analysis of the appropriateness of a “payday loan” company providing prepaid telecommunications service.
- Case No. TX-2001-73, In the Matter of Proposed New Rules on Prepaid Calling Cards.
- Case No. TO-2001-455, the AT&T/Southwestern Bell Telephone Company arbitration, which included issues associated with unbundled network elements.
- Case No. TX-2001-512, In the Matter of Proposed Amendments to Commission Rule 4 CSR 240-33.010, 33.020, 33.030, 33.040, 33.060, 33.070, 33.080, 33.110, and 33.150 (telecommunications billing practices).
- Case No. TO-2002-222, the MCI/SWBT arbitration.
- Case No. TR-2002-251, In the Matter of the Tariffs Filed by Sprint Missouri, Inc. d/b/a Sprint to Reduce the Basic Rates by the Change in the CPI-TS as Required by 392.245(4), Updating its Maximum Allowable Prices for Non-Basic Services and Adjusting Certain Rates as Allowed by 392.245(11) and Reducing Certain Switched Access Rates and Rebalancing to Local Rates as Allowed by 392.245(9).
- Case No. TX-2002-1026, In the Matter of a Proposed Rulemaking to Implement the Missouri Universal Service Fund End-User Surcharge.
- Case No. TX-2003-0379, In the Matter of Proposed Amendments to Commission Rule 4 CSR 240-3.545, formerly 4 CSR 240-30.010 (tariff filing requirements).
- Case No. TX-2003-0380, In the Matter of Proposed Amendments to Commission Rules 4 CSR 240-2.060, 4 CSR 240-3.020, 4 CSR 240-3.510, 4 CSR 240-3.520, and 4 CSR 240-3.525 (competitive local exchange carrier filing requirements and merger-type transactions).
- Case No. TX-2003-0389, In the Matter of Proposed Amendment to Commission Rules 4 CSR 240-3.530 and 4 CSR 240-3.535, and New Rules 4 CSR 240-3.560 and 4 CSR 240-3.565 (telecommunications bankruptcies and cessation of operation).
- Case No. TX-2003-0445, In the Matter of a Proposed New Rule 4 CSR 240-33.160 Regarding Customer Proprietary Network Information.
- Case No. TX-2003-0487, In the Matter of Proposed Commission Rules 4 CSR 240-36.010, 36.020, 36.030, 36.040, 36.050, 36.060, 36.070, and 36.080 (arbitration and mediation rules).
- Case No. TX-2003-0565, In the Matter of a Proposed Rulemaking to Codify Procedures for Telecommunications Carriers to Seek Approval, Amendment and Adoption of Interconnection and Resale Agreements.
- Case Nos. TX-2004-0153 and 0154, in the Matter of Proposed Rule for 211 Service (emergency and permanent rules).

- Case Nos. TO-2004-0370, IO-2004-0467, TO-2004-0505 et al, In the Matter of the Petition of various small LECs for Suspension of the Federal Communications Commission Requirement to Implement Number Portability.
- Case No. TX-2005-0258, In the Matter of a New Proposed Rule 4 CSR 240-33.045 (placement and identification of charges on customer bills).
- Case No. TX-2005-0460, In the Matter of the Proposed Amendments to the Missouri Universal Service Fund Rules.
- Case No. TO-2006-0093, In the Matter of the Request of Southwestern Bell Telephone, L.P. d/b/a SBC Missouri, for Competitive Classification Pursuant to Section 392.245.6, RSMo (2205) – 30-day Petition.
- Case Nos. TC-2005-0357, IR-2006-0374, TM-2006-0306, the complaint case, earnings investigation and transfer of assets case to resolve issues related to Cass County Telephone Company, LP, LEC Long Distance, FairPoint Communications, Inc., FairPoint Communications Missouri Inc. d/b/a FairPoint Communications and ST Long Distance Inc. db/a FairPoint Communications Long Distance.
- Case No. TC-2006-0068, FullTel, Inc., v. CenturyTel of Missouri, LLC.
- Case No. TX-2006-0169, In the Matter of Proposed New Rule 4 CSR 240-3.570 Regarding Eligible Telecommunications Carrier Designations for Receipt of Federal Universal Service Fund Support.
- Case No. TX-2006-0429, In the Matter of a Proposed Amendment to 4 CSR 240-3.545 (one day tariff filings).
- Case No. TX-2007-0086, In the Matter of a Proposed Rulemaking to Create Chapter 37 – Number Pooling and Number Conservation Efforts
- Case No. TA-2009-0327, In the Matter of the Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Lifeline and Link Up Service to Qualified Households.
- Case No. RA-2009-0375, In the Matter of the application of Nexus Communications, Inc. dba TSI for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Wireless Lifeline and Link Up Service to Qualifying Households.
- Case No. AX-2010-0061, Office of Public Counsel’s Petition for Promulgation of Rules Relating to Billing and Payment Standards for Residential Customers.
- Case No. GT-2009-0056, In the Matter of Laclede Gas Company’s Tariff Revision Designed to Clarify its Liability for Damages Occurring on Customer Piping and Equipment Beyond the Company’s Meter.
- Case No. ER-2012-0166, In the Matter of Union Electric Company d/b/a Ameren Missouri’s Tariffs to Increase Its Revenues for Electric Service. Energy Independence and Security Act of 2007 (EISA).
- Case No. ER-2012-0174, In the Matter of Kansas City Power & Light Company’s Request for Authority to Implement A General Rate Increase for Electric Service. Energy Independence and Security Act of 2007 (EISA).

- Case No. ER-2012-0175, In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement A General Rate Increase for Electric Service. Energy Independence and Security Act of 2007 (EISA).
  - Case No. ER-2012-0345, In the Matter of Empire District Electric Company of Joplin, Missouri Tariff's Increasing Rates for Electric Service Provided to Customers in the Missouri Service Area of the Company. Energy Independence and Security Act of 2007 (EISA).
  - File Nos. EO-2013-0396 and EO-2013-0431, In the Matter of the Joint Application of Entergy Arkansas, Inc., Mid South TransCo, LLC, Transmission Company Arkansas, LLC and ITC Midsouth LLC for Approval of Transfer of Assets and Certificate of Convenience and Necessity, and Merger and, in connection therewith, Certain Other Related Transactions; and In the Matter of Entergy Arkansas, Inc.'s Notification of Intent to Change Functional Control of Its Missouri Electric Transmission Facilities to the Midwest Independent Transmission System Operator Inc. Regional Transmission System Organization or Alternative Request to Change Functional Control and Motions for Waiver and Expedited Treatment, respectively.
  - Case No. MX-2013-0432, In the Matter of a Proposed Rulemaking to Revise Manufactured Housing Rules Regarding Installation and Monthly Reporting Requirements.
  - Case No. TX-2013-0324, In the Matter of a Proposed Rulemaking to the Missouri Universal Service Fund.
  - Case No. EO-2014-0095, In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish Demand-Side Programs Investment Mechanism.
- 
- Actively participated in or prepared comments on numerous issues on behalf of the Commission to be filed at the Federal Communications Commission.
  - Prepared congressional testimony on behalf of the Commission on number conservation efforts in Missouri.
  - A principal author on Missouri Public Service Commission Comments on the Reduction of Carbon Emissions in Missouri under Section 111(d) of the Clean Air Act.

Commission Arbitration Advisory Lead Staff for the following cases:

- Case No. TO-2005-0336, Southwestern Bell Telephone, L.P., d/b/a SBC Missouri's Petition for Compulsory Arbitration of Unresolved Issues For a Successor Interconnection Agreement to the Missouri 271 Agreement ("M2A").
- Case No. IO-2005-0468, In the Matter of the Petition of Alma Telephone Company for Arbitration of Unresolved Issues Pertaining to a Section 251(b)(5) Agreement with T-Mobile USA, Inc.

- Case No. TO-2006-0147 et al, In the Matter of the Petition for Arbitration of Unresolved Issues in a Section 251(b)(5) Agreement with T-Mobile USA, Inc and Cingular Wireless.
- Case No. TO-2006-0299, Petition of Socket Telecom, LLC for Compulsory Arbitration of Interconnection Agreements with CenturyTel of Missouri, LLC and Spectra Communications, LLC, pursuant to Section 251(b)(1) of the Telecommunications Act of 1996.
- Case No. TO-2006-0463, In the Matter of the Petition for Arbitration of Unresolved Issues in a Section 251(b)(5) Agreement with ALLTEL Wireless and Western Wireless.
- Case No. TO-2009-0037, In the Matter of the Petition of Charter Fiberlink-Missouri, LLC for Arbitration of an Interconnection Agreement Between CenturyTel of Missouri, LLC and Charter Fiberlink-Missouri, LLC.