

**BEFORE THE PUBLIC SERVICE COMMISSION
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,) **File No. EA-2016-0358**
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 345 kV Transmission Line)

IBEW UNIONS' POST-HEARING BRIEF

COME NOW, IBEW Local Union 2 and IBEW Local Union 53 (collectively, the “IBEW Unions”), through counsel, and file their post-hearing brief in support of issuing a Certificate of Convenience and Necessity (“CCN”) to Grain Belt Express Clean Line LLC (“Grain Belt”).

DISCUSSION

I. Does the evidence establish that the Commission may lawfully issue to Grain Belt Express Clean Line LLC ("Grain Belt") the certificate of convenience and necessity ("CCN") it is seeking for the high-voltage direct current transmission line and converter station with an associated AC switching station and other AC interconnecting facilities?

Yes. Because Grain Belt’s application for a CCN was filed under Section 393.170.1 of the Missouri Revised Statutes, the Commission may lawfully issue the CCN.

II. 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 public service?

Yes. The evidence submitted by Grain Belt throughout this proceeding establishes that the proposed high-voltage direct current transmission line and converter station (the “project”)

are necessary and convenient for public service based on the *Tartan* factors¹. The public interest factor is of particular relevance to the IBEW Unions, and is discussed more fully below.

A. The Grain Belt Express Project Should Provide Significant, High-Quality Employment and Lead to Future Clean Energy Development in Missouri.

The IBEW Unions are labor organizations that represent a wide range of electrical workers, including but not limited to specialists in construction of electrical transmission and distribution systems, line clearance and tree trimming. Exhibit 750, p. 2, lines 6-9. IBEW Locals 2 and 53 each represent persons employed in the electrical industry in Missouri. *Id.* Local 53 Business Manager Stephen White worked in the field for approximately 11 years and has worked another 15 years as a full-time representative of electrical workers. Exhibit 750, lines 12-15. He brings to this proceeding a wealth of practical knowledge about the current and future energy needs in Missouri and the impediments to meeting those needs.

The proposed Grain Belt Express project involves the installation of approximately 206 miles of high-voltage direct current transmission line and a substation in Missouri. Mr. White testified that, based on his 25 years of practical experience in the field, he agrees with Grain Belt's estimate that the project would employ approximately 1,500 individuals overall with good paying jobs, including IBEW-represented workers. *See* Exhibit 750, p. 4, lines 12-15. Because his local represents construction workers, his members are not permanent employees of a particular employer, but move from one construction project to the next. A construction project that lasts 2.5 years is significant. Moreover, “[c]onstruction begets future construction” so the Project – which could open the door for future green energy projects – is a first step in maintaining good employment of highly trained Missouri residents. Exhibit 750, p. 5, lines 1-6.

¹ *In Re Tartan Energy Co., LC*, 3 Mo.P.S.C.3d 173, 177, GA-94-127 (1994).

Mr. White testified that the current electrical grid in Missouri will not support clean wind energy without upgrading. Exhibit 750, p. 3, lines 20-21. The HVDC line proposed by Grain Belt as part of this project will interconnect with the Ameren line, providing a small part of the upgrading that will be necessary to accomplish the federal and Missouri goal of transmitting electricity more cleanly. Exhibit 750, p. 4, lines 7-9. Approval of the Project would also encourage other green development that is currently hampered by the inadequacy of the electrical grid. Exhibit 750, p. 4, lines 1-4.

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

The IBEW Unions take no position as to any conditions the Commission should impose on Grain Belt should it grant the CCN.

IV. 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)?

The IBEW Unions take no position as to a potential waiver of the reporting requirements.

V. If the Commission wanted to condition the effectiveness of the CCN on the actual construction of the proposed converter station and the actual delivery of 500MW of wind to the converter station, how would it do so?

The IBEW Unions take no position on this issue, other than to state that such conditions should not be reasonable or necessary for the public service if the Commission agrees that the *Tartan* criteria have been satisfied.

WHEREFORE, the IBEW Unions respectfully submit the foregoing Post-hearing Brief for the Commission's consideration.

Respectfully submitted,

/s/ Emily R. Perez

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Certificate of Service

I certify that a true and correct copy of the foregoing document was served the parties to this case by email on April 10, 2017.

/s/ Emily R. Perez _____