

**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) File No. EA-2016-0358
Current Transmission Line and an Associated)
Converter Station Providing an Interconnection on the)
Maywood - Montgomery 345 kV Transmission Line.)

POSITION STATEMENT OF INFINITY WIND POWER

Infinity Wind Power (Infinity), by and through counsel, hereby provides its statement of position.

1. ***Does the evidence establish that 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. With regard to §229.100 RSMo, the Commission recently approved a CCN request prior to the Applicant obtaining county commission approval in File No. 2015-0146 (see, *Report & Order*, pp. 31-39, issued Apr. 27, 2016; see also, *Order Regarding Applications for Rehearing, Motion for Reconsideration, and Requests for Clarification*, p. 2, issued Jun. 8, 2016). Under the Commission’s own analysis in that matter, § 229.100 RSMo did not preclude the Commission from granting the CCN. The Commission should follow its own precedent and issue the CCN to Grain Belt Express.

2. ***Does the evidence establish that the high-voltage direct current transmission line and converter station for which Grain Belt is seeking a CCN are “necessary or convenient for the public service” within the meaning of that phrase in section 393.170 RSMo.?***

Yes. As a wind developer Infinity believes the Grain Belt Express Project offers a solution to current transmission constraints. The Grain Belt Project is the most efficient way to deliver large quantities of power from Western Kansas, and has the potential to provide Missouri

consumers with significant savings, as evidenced by the combination of the power purchase agreement (PPA) between Infinity and the Missouri Joint Municipal Electric Utility Commission (MJMEUC), and the transmission service agreement (TSA) between Grain Belt and MJMEUC. Absent the Grain Belt Express transmission line, these savings would not occur.

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

The Commission should impose only those conditions already agreed to by Grain Belt Express.

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

Infinity takes no position on this issue.

Respectfully submitted,

/s/ Terri Pemberton

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ATTORNEYS FOR INFINITY WIND POWER

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon the parties to this proceeding by email or U.S. Mail, postage prepaid, this 13th day of March 2017.

/s/ Terri Pemberton

Terri Pemberton

Attorney for Infinity Wind Power