

**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**

**STAFF’S RESPONSE TO GRAIN BELT’S REQUEST  
FOR WAIVER OF 60-DAY NOTICE**

**COMES NOW** the Staff of the Missouri Public Service Commission, and for its *Response to Grain Belt’s Request for Waiver of 60-Day Notice Provision*, states as follows:

1. On July 12, 2022, Grain Belt Express filed in Case No. EA-2016-0358 a *Notice of Intended Amendment Filing*, providing notice that it would in 60 days file its *Application to Amend* its existing Certificate of Convenience and Necessity (“CCN”).
2. On July 13, 2022, the Commission opened the present case as a vehicle for Grain Belt’s amendment application and proceedings thereupon.
3. On August 24, 2022, Grain Belt filed its *Request for Waiver of 60-Day Notice*, together with its *Application to Amend* and supporting direct testimony.
4. On September 1, 2022, the Commission directed that, among other things, any responses to Grain Belt’s waiver request must be filed by October 11, 2022.
5. Staff now advises the Commission that it is OPPOSED to the granting of Grain Belt’s waiver request because:

A. The proposed Tiger Connector is an entirely new line, including two additional counties not part of the original CCN. It is thus outside the scope of the original CCN and requires its own CCN, not merely an amendment to a previous CCN that may no longer be valid in any case.

B. The project is now no longer as described in the original CCN. The original project would deliver 500 megawatts (“MW”) of wind-generated electricity from western Kansas to customers in Missouri, and another 3,500 MW to states further east. The proposed amendment changes the project to a 5,000 MW line, capable “of delivering up to 1,500 MW of power to the MISO market in Missouri, 1,000 MW to AECI in Missouri, and up to 2,500 MW of power to the PJM market through the interconnections with the existing transmission grid in Missouri and Indiana, respectively.” A new CCN is necessarily required for this radically changed project.

**WHEREFORE**, Staff states that it is **OPPOSED** to the granting of Grain Belt’s waiver request.

Respectfully submitted,

/s/ Kevin A. Thompson  
**KEVIN A. THOMPSON**  
Missouri Bar No. 36288  
Chief Staff Counsel

Missouri Public Service Commission  
Post Office Box 360  
Jefferson City, Missouri 65102  
(573)751-6513 Voice  
(573)522-6969 FAX  
[kevin.thompson@psc.mo.gov](mailto:kevin.thompson@psc.mo.gov)

Counsel for the Staff of the Missouri  
Public Service Commission.

**Certificate of Service**

I affirm that a true and correct copy of the foregoing was served electronically upon all parties of record pursuant to the Service List maintained by the Commission's Data Center **on this 11<sup>th</sup> day of October, 2022.**

/s/ Kevin A. Thompson