

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-2014-0207**
Current Transmission Line and an Associated Converter)
Station Providing an Interconnection on the Maywood –)
Montgomery 345 kV Transmission Line)

POSITION STATEMENT OF SIERRA CLUB

1. 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 the public service?

Sierra Club requests that the Commission grant the certificate of convenience and necessity sought in the Application of Grain Belt Express Clean Line. The Application, Siting Study, testimony, schedules and DR responses provided by Grain Belt demonstrate that the HVDC transmission line project satisfies the criteria for the grant of a CCN under § 393.170, RSMo: need, economic feasibility, financial ability, qualification and public interest.

With regard to need and public interest in particular, these criteria are met by a project that promises to reduce the pollution associated with generation from coal, and at a lower price. The movement of energy from wind-rich areas to population centers in Missouri, the Midwest and the East contributes to the national goal of mitigating deleterious climate change.

The injection of 500 MW of wind in Ralls County will benefit Missouri by making cleaner energy available either through Ameren Missouri or on the wider MISO grid. It will

facilitate compliance with the Renewable Energy Standard, whether through the purchase of bundled or unbundled Renewable Energy Credits. Even if no injection is made in Missouri, the climate benefits of a large injection of wind energy elsewhere in the country will directly inure to Missourians since it will curtail greenhouse gas emissions, which damage the climate no matter where they are made.

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

Grain Belt Express has consented to most of the conditions imposed on it by PSC Staff. Sierra Club supports these conditions unless they require a CCN as a condition precedent, are unduly burdensome or not feasible, as detailed in the surrebuttal testimonies of Grain Belt witnesses Berry (pp. 51–2, 52–3, 55–9), Zavadil (pp. 14–5) and Galli (pp. 7–9).

The Commission should reject the condition proposed by MLA witness Gray that Grain Belt have capacity contracts signed before seeking a CCN for the reasons given in the surrebuttal testimony of Mr. Berry (pp. 59–60).

Sierra Club takes no position on the conditions sought by Rockies Express but notes the arguments advanced against them in the surrebuttal of Mr. Galli (pp. 11–13).

3. 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)?

Sierra Club supports the waiver from the reporting requirements of 4 CSR 240-3.145 since Grain Belt Express will not be charging rates to Missouri customers.

Sierra Club takes no position on the applicability of 4 CSR 240-3.165 for filing an annual report.

Sierra Club supports a waiver from the requirements of 4 CSR 240-3.175 since a depreciation study is not necessary for purposes of the Commission.

Sierra Club supports a waiver from 4 CSR 240-3.190 because the information sought therein is not relevant to a transmission company.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 7th day of November, 2014, to all counsel of record.

/s/ Henry B. Robertson
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