

**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)
Current Transmission Line and an Associated Converter)
Station Providing an interconnection on the Maywood-)
Montgomery 345 kV Transmission Line.)

Case No. EA-2014-0207

**STAFF’S RESPONSE TO THE RECOMMENDATION OF
GRAIN BELT EXPRESS CLEAN LINE LLC**

COMES NOW the Staff of the Missouri Public Service Commission and for its *Response* to the *Recommendation* filed herein by Grain Belt Express Clean Line LLC (“Grain Belt” or “Company”) states as follows:

1. Following the Commission’s discussion of this matter at its Agenda meeting on June 2, 2015, Grain Belt on June 10, 2015, filed its *Recommendation* requesting that the Commission “refrain from issuing a Report and Order at this time” and “hold the case in abeyance and allow Grain Belt Express to gather additional information requested by the Commission and to supplement the record” and “work with Staff to develop additional production cost models.”

2. While Staff does not take a position on Grain Belt’s *Recommendation*, Staff would like to point the Commission to Grain Belt’s April 13, 2015, *Response to Order Directing Filing of Additional Information*, in which Grain Belt stated, “[s]ome of the information requested, such as final interconnection agreements will not be available until later in the development of the Project and **after the receipt of key regulatory approvals including the Certificate of Convenience and Necessity (“CCN”) sought in this case**” (emphasis added).

3. In response to question 1, Grain Belt states “The large-scale acquisition of easements for transmission lines typically begins **after the receipt of key regulatory approvals, such as when this Commission issues a decision on the Company's Application for a CCN**” (emphasis added).

4. In response to question 3, Grain Belt states, “[p]ublic utilities are unlikely to make a definitive commitment to purchase energy delivered by the Project **until it has received its major regulatory approvals, such as a CCN from this Commission**. Until Grain Belt Express is authorized to build the Project, neither the Company nor wind generators can make binding commitments to deliver or sell power. Therefore, the absence of PPAs at this stage of the development of a large, multi-state transmission project like the Grain Belt Express Project is to be expected” (emphasis added).

5. In response to question 12, Grain Belt describes additional modeling efforts that were undertaken after discussions with Staff and other parties and also describes limitations of outstanding modeling requests. In addition, based on discussions with Grain Belt, Staff has no reason to believe that further production modeling would be productive or relevant.

6. In response to question 13, Grain Belt states that it will provide information as it becomes available. For instance, Grain Belt notes the complete storm restoration plans will be updated following “receipt of key regulatory approvals, and the final engineering and construction of the Project.” A MISO Definitive Planning Phase Study is expected in the third quarter of 2015, at which time the Project will enter the next available MISO DPP Study cycle expected to be in February 2016.

7. In short, it is not clear what information Grain Belt will be able to provide that it either has not already provided or that will not be available unless and until the Commission issues an order related to the request for a CCN. However, should significant new information become available regarding the design or planned operation of the project, it is likely that such information would be best considered in a new proceeding.

WHEREFORE, Staff prays that the Commission will accept its *Response* to Grain Belt's *Recommendation*.

Respectfully submitted,

/s/ Kevin A. Thompson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served, by hand delivery, electronic mail, or First Class United States Mail, postage prepaid, to all parties of record on the Service List maintained for this case by the Data Center of the Missouri Public Service Commission, on this 18th day of June, 2015.

/s/ Kevin A. Thompson