

**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 ) Case No. EA-2014-0207  
Maintain a High Voltage, Direct Current )  
Transmission Line and an Associated Converter )  
Station Providing an Interconnection on the )  
Maywood-Montgomery 345 kV Transmission Line )

**APPLICATION TO INTERVENE BY WIND ON THE  
WIRES AND THE WIND COALITION**

COMES NOW Wind on the Wires and The Wind Coalition (“Wind Advocates”), by Counsel, and hereby petition the Public Service Commission of the State of Missouri ("PSC" or "Commission") for an order permitting Wind on the Wires and The Wind Coalition to intervene in this proceeding under 4 CSR 240-2.075 as interested entities. In support of this Application to Intervene Wind on the Wires and Wind Coalition state and allege as follows:

1. Wind on the Wires is a not-for-profit corporation organized and existing under the laws of the State of Minnesota. Wind on the Wires is a collaborative organization dedicated to wind energy’s fair access to the electric transmission system and market throughout the Midwest. Our Board of Directors and members are comprised of wind developers, environmental organizations, wind energy experts, tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry in Missouri and across the country. Wind on the Wires is located at 570 Asbury St, Suite 201, St. Paul, MN 55104.

Notice and mailings may be sent to:

Sean Brady  
Regional Policy Manager  
P.O. Box 4072  
Wheaton, IL 60189-4072

2. The Wind Coalition is a non-profit association formed to encourage the development of the vast wind energy resources of the south central United States. The Wind Coalition is active in two particular regions: the Southwest Power Pool (“SPP”) and the Electric Reliability Council of Texas (“ERCOT”) grid systems, which cover all or part of 8 states (Texas, Oklahoma, Kansas, Nebraska, Missouri, Arkansas, New Mexico, and Louisiana). The Wind Coalition’s members include developers, manufacturers, and public interest advocates. Per Commission Rule 2.075(2)(D) a list of members is attached to this Application as Exhibit A. Mailings and notices may be sent to:

Jeff Clark  
Executive Director  
919 Congress Ave., Suite 1220  
Austin, TX 78701

3. This motion is brought within the deadline to seek intervention established in the Commission’s Order Directing Notice, Setting Intervention Deadline.
4. Wind on the Wires and The Wind Coalition will be directly impacted by the decision to grant or deny Grain Belt Express Clean Line L.L.C. (“Grain Belt”) a certificate of public convenience and necessity. Grain Belt seeks permission to build, operate and maintain a high voltage, direct current (“HVDC”) transmission line that will traverse Missouri from Kansas to Illinois and terminate in Indiana. Electricity converter station facilities will be built to deliver low-cost electricity generated by wind energy facilities in Kansas to load and population centers in Missouri, Illinois, Indiana and to utilities operating in other states in the Midcontinent ISO (“MISO”) and PJM footprints. If the certificate of need is not granted, Wind on the Wires and The Wind Coalition will be

materially harmed because they lose the opportunity to build wind energy facilities in Kansas that would deliver cost effective renewable energy into Missouri, Illinois and Indiana and other states served by SPP, MISO and PJM.

5. Wind on the Wires and The Wind Coalition will be supporting the certificate of public convenience and necessity sought by Grain Belt.
6. No other party or entity interested in this proceeding can adequately represent the interests of the Wind Advocates because their interest differs from those of the general public and Missouri Landowners Alliance, The Eastern Missouri Landowners Alliance, Illinois Brotherhood of Electrical Workers Locals 2, 53 and 1439, Missouri Farm Bureau Federation, and David McKnight; granting intervention will advance the interests of justice and will in no way impair the prompt consideration and resolution of this matter by the Commission.
7. Wind on the Wires' and The Wind Coalition's intervention will serve the public interest by assisting the development of a full and complete record for the PSC's decision in this case.

Wherefore, Wind on the Wires and The Wind Coalition seek and order granting intervention and the opportunity to provide additional information which will serve the public interest.

/s/ Steven C. Reed  
Steven C. Reed  
MoBar #40616  
Attorney for Wind on the Wires and The Wind Coalition  
P.O. Box 579  
Holts Summit, MO 65043  
573-301-8950  
[reedsteven00@gmail.com](mailto:reedsteven00@gmail.com)

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on April 25, 2014

/s/Steven C. Reed

## Exhibit A: The Wind Coalition Members

### *AES Wind Generation*

AES Wind Generation is part of The AES Corporation, headquartered in Arlington, Virginia. AES Wind Generation operates more than 1200 MW of wind facilities globally with additional projects in development throughout the US, Europe, and Asia. In Texas, AES developed, constructed, owns, and operates the 524 MW Buffalo Gap wind project near Abilene. Buffalo Gap began commercial operation in 2006 and supports the energy needs of over 100,000 homes in the Lone Star State.

AES is one of the world's largest global power companies, with 2007 revenues of \$13.6 billion. With operations in 29 countries on five continents, AES's generation and distribution facilities have the capacity to serve 100 million people worldwide. Our 14 regulated utilities amass annual sales of approximately 76,000 GWh and our 124 generation facilities have the capacity to generate approximately 43,000 megawatts. Our global workforce of 28,000 people is committed to operational excellence and meeting the world's growing power needs. To learn more about AES, please visit [www.aes.com](http://www.aes.com)

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### *Acciona*

ACCIONA's group of North American companies are subsidiaries of ACCIONA S.A., a company that ranks among the world's leading sustainability-focused businesses centered around renewable energy, infrastructure and water treatment. Acciona Energy has been pioneering renewable energy for nearly 20 years and is active in all major renewable-energy solutions—solar, wind, biomass, biofuels and small hydro. We are committed to pioneering and developing a lasting foundation of sustainability in the U.S. and Canada. [www.acciona-na.com](http://www.acciona-na.com)

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### *Apex Clean Energy*

Apex Clean Energy is an independent renewable energy company based in Charlottesville, Virginia. Since its founding in 2009, Apex has become one of the fastest-growing companies in the industry. In December 2012, Apex completed the development and construction of the 300 MW Canadian Hills Wind project outside Oklahoma City, Oklahoma. The company has a diversified portfolio of wind energy facilities in development around the country and owns several operating solar PV assets. The company's management team comprises experts from throughout the industry whose collective prior experience includes the development, financing, construction, and operation of more than \$10 billion in wind and solar energy facilities now operating in the United States. More information is available at: [www.apexcleanenergy.com](http://www.apexcleanenergy.com).

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### *Blattner Energy, Inc.*

Blattner Energy, Inc. delivers complete construction services for owners and developers of renewable energy across the United States. Blattner has participated as the EPC contractor on seven of the ten largest wind energy projects within the United States. Services include permitting procurement, access road construction, foundations installation, turbine erection and

mechanical completion, electrical collection, substations, transmission, communication installations, and O&M building construction. [www.blattnerenergy.com](http://www.blattnerenergy.com)

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*BP Alternative Energy North America*

Information about BP Alternative Energy North America is available on their website at [www.BP.com](http://www.BP.com).

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**Clean Line Energy** Clean Line provides transmission solutions to generators and load-serving utilities in order to efficiently interconnect clean energy with consumers. The company works conscientiously to establish and maintain close working relationships with landowners, communities, state officials, customers and suppliers as it strives to help expand the grid to accommodate renewable energy. More information at [www.cleanlineenergy.com](http://www.cleanlineenergy.com)

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*Duke Energy*

Duke Energy is one of the largest electric power companies in the United States, supplying energy to approximately 4 million U.S. customers.

Through its non-regulated affiliates, Duke Energy develops, owns, and operates electric generation for large energy consumers, municipalities, utilities and industrial facilities. We currently manage more than 7,300 MW of power generation at 28 facilities throughout the United States. Duke Energy has developed over 800 MW of wind energy projects, manages approximately 700 MW of wind energy in operation, and has over 5,000 MW of wind energy projects in the development pipeline.

We specialize in developing innovative and environmentally sound generation solutions to meet our customers' energy needs using a diverse mix of fuels, including wind, biomass and other renewable sources. [www.duke-energy.com](http://www.duke-energy.com)

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*EDP Renewables North America*

EDP Renewables North America develops, constructs, owns and operates wind farms throughout North America. Headquartered in Houston, Texas, EDP has over 25 offices across the US and has developed more than 2,500 megawatts and operates over 2,000MW of wind farms. The company is a global leader in the renewable energy sector that designs, develops, manages and operates power plants that generate electricity using renewable energy sources. [www.edpr.com](http://www.edpr.com).

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*Edison Mission Energy*

Edison Mission Group (EMG) is one of the nation's leading owners and operators of competitive electric power generation in the U.S. Based in Irvine, Calif., EMG manages the competitive power generation business of Edison International (NYSE:EIX), a generator and distributor of electric power, and an investor in infrastructure and energy assets, including renewable energy.

Through its subsidiaries Edison Mission Energy (EME) and Edison Mission Operations and Maintenance (EMOM), Edison Mission Group owns, leases and operates 44 power generation facilities in 14 states that sell more than 10,000 megawatts of electricity into competitive, wholesale markets and to utilities. Active in developing wind energy for 10 years, EMG currently has 25 wind projects totaling approximately 1,200 megawatts of capacity in operation or under construction and a development pipeline of potential additional wind projects with a projected capacity of approximately 5,000 megawatts. EMG also conducts price risk management and energy trading activities through Edison Mission Marketing and Trading, which is based in Boston. [www.edison.com](http://www.edison.com)

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#### *Electric Power Engineers, Inc. (EPE)*

Electric Power Engineers, Inc. (EPE), founded in 1968, provides engineering consulting and management services for transmission, distribution, industrial, and generation clients. EPE has extensive experience in guiding generation developers through the process of evaluating the transmission grid deliverability, applying for interconnections, and coordinating design/engineering/procurement of wind and solar generation facilities.

EPE assists our clients through all stages of renewable generation development: from initial site evaluation to operation on the transmission grid. Some of our routinely provided services are listed below:

- Evaluation of Transmission Grid Export Capacity - Interconnection Applications - Act as Owner's Engineer: Coordinating engineering, Procurement, & Construction - Transmission maps - Site Location Selection - Economic analysis of present and future value of projects - Location Marginal Pricing (LMP) studies - Anemometer installation and management: Compile wind data to assess project viability

EPE has performed the above and more for projects throughout the United States and in international locations. <http://www.epeconsulting.com/>

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#### **Enel Green Power North America, Inc.**

Enel Green Power North America, Inc. (EGP-NA), part of Enel Green Power, is a leading owner and operator of renewable energy plants in North America with projects operating and under development in 21 U.S. states and three Canadian provinces. EGP-NA owns and operates over 70 plants with an installed capacity of around 800 MW powered by renewable hydropower, wind, geothermal, solar and biomass energy. Together with its development partners (TradeWind Energy, LLC. and Geronimo Wind Energy, LLC.) EGP-NA aiming to double its total installed capacity within the next few years. The company employs more than 320 people in North America with strong technical and financial expertise.

Enel Green Power is the Enel Group company dedicated to the development and management of power generation from renewable resources around the world, with a presence in Europe and the Americas. It is an industry leader worldwide thanks to some 22 billion kilowatt hours generated from water, sun, wind and geothermal, meeting the energy needs of some eight million households and avoiding 16 million tonnes of carbon dioxide emissions each year. The company

has an installed capacity of more than 6,100 MW, with over 650 facilities around the world and a generation mix that includes wind, solar, hydro, geothermal and biomass.

Website: [www.enelgreenpower.com/northamerica](http://www.enelgreenpower.com/northamerica)

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### *EDF Renewables*

EDF Renewables is committed – in design, development, construction, operations and management – to create the most efficient renewable energy projects possible.

In the more than twenty years since EDF was established in 1987, our focus on renewable energy has made us an industry leader in wind project development, and a premier provider of operation and maintenance services throughout North America.

Our renewable energy focus has also given us the opportunity to build an organization of renewable energy experts whose extensive experience and expertise is specifically tailored to create value, deliver results and provide the best possible service for our developer and integrator partners.

Since 2002, EDF Renewables has been an affiliate of EDF Energies Nouvelles (formerly SIIF Energies). EDF Energies Nouvelles is a member of the EDF Group, with the charter of becoming a world leader in renewable energy.

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### *E.ON*

E.ON Climate and Renewables North America (ECRNA) is one of the largest owners of renewable power projects and is rapidly expanding its wind, solar and alternative energy portfolio. The company develops, owns and operates some of the industry's most efficient and highest performing facilities in the United States. As one of the fastest growing renewable power companies, E.ON Climate and Renewables North America has eight operating wind farms totaling more than 1,100 megawatts (MW), several projects under construction and is actively developing projects throughout the US and Canada. E.ON Climate and Renewables North America is a subsidiary of E.ON AG, one of the world's largest energy companies, and the largest investor-owned utility in the world. [www.eon-us.com](http://www.eon-us.com)

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### **Exelon**

Exelon Wind owns and operates 36 wind projects in eight states – Texas, Missouri, Kansas, Minnesota, Michigan, Illinois, Idaho and Oregon — totaling 735 MW of clean, renewable energy. Exelon Wind, with offices in West Des Moines, Iowa, is a division of Exelon Power.

Both subsidiaries are part of Chicago-based Exelon Corp., one of the nation's largest electric utilities with more than \$17 billion in annual revenues. The company has one of the industry's largest portfolios of electricity generation capacity, including nearly 19,000 MW of zero-emissions capacity in the Midwest and Mid-Atlantic regions. [www.exeloncorp.com](http://www.exeloncorp.com)

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*Gamesa*

[www.gamesacorp.com](http://www.gamesacorp.com)

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*GE Energy*

GE is one of the world's leading wind turbine suppliers and works closely with customers to achieve mutual growth and success. The company started with their first steam turbine in 1901 and now has over 5,500 wind and 3,600 hydro turbines. [www.geenergy.com](http://www.geenergy.com)

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*Iberdrola Renewables*

Iberdrola Renewables is a world leader in the production of renewable energy which boasts the largest base of operational renewable assets and the largest portfolio of future projects in the world. Iberdrola Renewables is a multinational company, operating in more 20 countries including the world markets with the greatest growth and development potential in this sector. The company offers a portfolio of products in North America by leveraging assets and expertise in renewable energy project development, electric power and natural gas trading, and natural gas storage. Iberdrola Renewables enjoys the support of Iberdrola SA who, as one of the four largest electric companies in the world, has made the environment and sustainable development key pillars of its future business strategy. [www.iberdrolarenewables.us](http://www.iberdrolarenewables.us)

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*Infinity Wind*

Infinity Wind was established in order to provide landowners the opportunity to partake in the renewable energy industry, and more specifically, with wind energy projects. The company's principal focus is to identify potential wind energy project sites and perform the work necessary to develop possible projects for delivery to market. [www.infinitywind.com](http://www.infinitywind.com)

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*Invenergy*

Founded in 2001 in Chicago, Invenergy is a leading clean energy company focused on the development, ownership, operation and management of large-scale wind and clean natural gas electricity generation assets in North America and Europe. With over 2,000 MWs of wind in operation or construction, Invenergy believes that local communities are the core of any successful wind project and works to foster positive relationships that will benefit all parties.

[www.invenergyllc.com](http://www.invenergyllc.com)

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### **Nobel Environmental Power**

Noble Environmental Power is a leading renewable energy company with a 726-megawatt generation portfolio and approximately 1,800 megawatts of windparks under development throughout the United States. Noble has operations in Connecticut, New York and Texas. [www.noblepower.com](http://www.noblepower.com)

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### *Pattern Energy*

Pattern Energy is an independent, fully integrated energy company that develops, constructs, owns, and operates clean power projects and transmission assets across North America and parts of Latin America. Pattern Energy commenced operations in June of 2009 as one of the most experienced and best-capitalized renewable energy and transmission development companies in the U.S.

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Riverstone Holdings LLC, an energy and power-focused private equity firm with \$17 billion under management, purchased Babcock & Brown's thriving North American energy development team and development pipeline to form Pattern Energy.

Pattern Energy retains an 80-person staff with offices in San Francisco, Houston, San Diego and New York, which successfully developed, financed and placed into operation more than 2,000 MW of wind power in eleven states. Pattern Energy's development pipeline exceeds 4,000 MW of renewable energy projects in addition to several power transmission projects. These projects will benefit local communities by providing jobs, tax revenue and economic stimulus and clean, domestic power to help meet the growing energy needs.

The Pattern Energy team will continue using our in-depth industry experience, combined with innovation and science, to deliver the utmost value for our partners and the communities where we work, while exhibiting a strong commitment to promoting environmental stewardship and corporate responsibility.

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### *RES Americas*

Founded in 1982, Renewable Energy Systems Americas Inc. (RES Americas) is a fully integrated energy company which develops, constructs, owns and operates renewable generation projects across the United States and Canada. With over 3,400 MW developed and/or constructed, RES Americas is a leader in the energy industry and will continue to be as our nation embraces renewable energy for powering the future. [www.res-americas.com](http://www.res-americas.com)

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*Third Planet*

Third Planet was formed by an experienced team of wind energy project developers committed to designing, owning, and operating commercial-scale wind projects throughout the United States. By generating clean, renewable energy, the company is dedicated to lessening our nation's dependence on fossil fuels. [www.thirdplanetwind.com](http://www.thirdplanetwind.com)

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*TradeWind Energy, LLC*

TradeWind Energy, LLC was founded in 2001 and is a leading developer of wind energy throughout the Midwestern states with a growing wind project pipeline approaching 10,000 MWs. TradeWind's management team has a strong combination of independent power producer industry experience and a physical presence in, and focus on, Midwest wind energy markets. Together, the team members have over 100 years of combined experience with different power project technologies, including wind, solar, gas, coal, hydro, and biomass. Since our inception, TradeWind Energy has partnered with landowners, utilities, environmental groups and communities in the Heartland to develop mutually beneficial wind projects. TradeWind takes great pride in our ability to deliver low-cost renewable energy while maintaining an uncompromising commitment to long-term project quality. [www.tradewindenergy.com](http://www.tradewindenergy.com)

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*Vestas-Americas, Inc.*

Vestas is No. 1 in Modern Energy. With more than 38,000 wind turbines installed in 63 countries, Vestas is the world's leading supplier of wind power systems. Our core business is comprised of the development, manufacture, sale and maintenance of cutting-edge technology that uses the energy of the wind to generate electricity.

Vestas Americas is the group's North American sales business unit, responsible for the sale and service of wind turbines in the USA and Canada. Vestas entered the North American market in the early 1980's and has a track record of supplying more than 10,000 wind turbines in North America. [www.vestas.com](http://www.vestas.com)

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*AWEA*

AWEA is the national trade association of America's wind industry, with more than 1,900 member companies, including global leaders in wind power and energy development, wind turbine manufacturing, component and service suppliers, and the world's largest wind power trade show. AWEA is the voice of wind energy in the U.S., promoting renewable energy to power a cleaner, stronger America. More information on wind energy is available at the AWEA Web site: [www.awea.org](http://www.awea.org)

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*Public Citizen*

Founded in 1971, Public Citizen is a national, nonprofit consumer advocacy organization formed to represent consumer welfare in Congress, the executive branch and the courts. The company

fighters for sincerity and democratic responsibility in government, for the right of consumers to seek reparations in the courts; for clean, safe and sustainable energy sources; for social economic justice in trade policies; for strong health, safety and environmental protections; and for safe, effective and affordable prescription drugs and health care. [www.citizen.org](http://www.citizen.org)

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### *Environmental Defense Fund*

Since 1967, the Environmental Defense Fund has linked science, economics and law to create modern, equitable and cost-effective solutions to society's most urgent environmental problems.

The company is a leading national nonprofit organization representing more than 500,000 members. It is dedicated to the protection of people's environmental rights by assessing environmental problems and working to create and advocate solutions that win unwavering political, economic and social support. [www.edf.org](http://www.edf.org)

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### *TREIA*

TREIA joined The Wind Coalition at its founding in order to continue the Association's efforts fostering cooperation and coordination among all the renewable energy sectors. As a non-profit trade association, the company supports its members in numerous ways, including trade shows, conferences, workshops, business referrals and opportunity notices, web site, newsletter, legislative lobbying, and regulatory intervention. [www.treia.org](http://www.treia.org)