

**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 345kV Transmission Line )

**Case No. EA-2016-0358**

**STAFF’S SUGGESTION TO JOIN  
AMEREN MISSOURI AS A PARTY**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and respectfully states as follows:

1. On March 26, 2014, Grain Belt Express Clean Line LLC (“GBE”) filed an application for a certificate of convenience and necessity (“CCN”) authorizing it to construct, own, operate, control, manage, and maintain electric transmission facilities within several counties in Missouri, as well as an associated converter station and associated AC interconnecting facilities in Ralls County, Missouri to facilitate the delivery of up to 500MW of power to the AC grid for utilities and their customers in Missouri, Illinois, and other states in the MISO region.<sup>1</sup>

2. The converter station and interconnecting facilities were to interconnect with the Union Electric Company d/b/a Ameren Missouri system along an AC transmission line connecting the Maywood 345 kV substation and the Montgomery 345 kV substation.

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<sup>1</sup> EA-2014-0207, EFIS Item No. 5, *Application of Grain Belt Express Clean Line LLC For a Certificate of Convenience and Necessity*, pg. 5.

3. In that case, Staff raised concerns about the potential effect of the GBE Project on the reliability of Ameren Missouri's system.<sup>2</sup> While GBE provided testimony regarding Staff's concerns,<sup>3</sup> Ameren Missouri was in a superior position to have knowledge about the potential effect the GBE project would have on its system. However, because Ameren Missouri was not a party to EA-2014-0207, that information was unavailable to the Commission.<sup>4</sup>

4. On July 1, 2015, the Commission issued its *Report and Order* denying Grain Belt's application for a CCN.

5. On August 30, 2016, Grain Belt filed its second application requesting that the Commission grant a line CCN; again asking for the authority to construct, own, operate, control, manage, and maintain electric transmission facilities within several counties in Missouri, including the construction of a converter station and associated interconnection facilities interconnecting with the Ameren Missouri system in Ralls County along the Maywood-Montgomery 345 kV AC transmission line.<sup>5</sup>

6. In its *Order Directing Notice, Setting Intervention Deadline, And Setting Procedural Conference*, issued August 31, 2016, the Commission set an intervention deadline of September 14, 2016. Twenty-two parties filed timely applications to intervene; however, Ameren Missouri was not one of those parties.

7. Because GBE is again proposing to interconnect with the Ameren Missouri system in Ralls County along the Maywood-Montgomery 345 kV AC

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<sup>2</sup> EA-2014-0207, EFIS Item No. 172, Rebuttal Testimony of Shawn E. Lange, pg. 11, ln. 12, through pg. 14, ln. 6.

<sup>3</sup> EA-2014-0207, EFIS Item No. 245, Surrebuttal Testimony of Dr. Wayne Galli, P.E. on Behalf of Grain Belt Express Clean Line LLC, pg. 14, ln. 10, through pg. 17, ln. 5.

<sup>4</sup> Discussion and review of the potential effects on Ameren's system would most likely involve the use of Ameren's highly confidential or proprietary information.

<sup>5</sup> EA-2016-0358, EFIS Item No. 34, *Application of Grain Belt Express Clean Line LLC For A Certificate Of Convenience And Necessity*, pg. 9.

transmission line, Staff has similar concerns, as well as additional concerns that have matured upon further review, regarding the Project's potential effect on the reliability of Ameren Missouri's system. Ameren Missouri is in a superior position to have knowledge regarding the constraints and/or remedies associated with injecting and withdrawing 500MW of energy to the transmission and sub-transmission system. Therefore, Staff suggests the Commission join Ameren Missouri to this proceeding.

**WHEREFORE**, the Staff respectfully suggests the Commission join Ameren Missouri as a party to this proceeding.

Respectfully Submitted,

**/s/ Mark Johnson**

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**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 5<sup>th</sup> day of October, 2016.

**/s/ Mark Johnson**