

**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

INITIAL BRIEF of CLEAN GRID ALLIANCE

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Clean Grid Alliance respectfully submits its Initial Brief in the above captioned case pursuant to Section 4240-2.140 of the Commission’s Practice and Procedure and upon the schedule agreed upon by the parties on June 8, 2023.

Clean Grid Alliance (“CGA”) addresses three of the five factors for granting a certificate of convenience and necessity (“CCN”) for the Missouri facilities of the transmission line (“Grain Belt Express Project” or “Project”) proposed by Grain Belt Express LLC (“Grain Belt Express”). More specifically, CGA will address whether the Project promotes the public interest, the need for project, and its economic feasibility.

I. INTRODUCTION and STATEMENT OF POSITION

Clean Grid Alliance supports Grain Belt Express’s request for an amendment to its certificate of convenience and necessity granted in EA-2016-0358.

Clean Grid Alliance has been a 20+ year proponent of transmission expansion that allows wind, solar, and battery storage to effectively and reliably interconnect and operate in the wholesale electric markets. Clean Grid Alliance is a not-for-profit collaborative member-driven organization. Its members represent a cross-section of for-profit companies and non-profit organizations that support the growth of wind, solar, and battery storage resources.

The Grain Belt Express Project is a generational project that can reduce energy and capacity prices, and improve reliability and resilience across three wholesale energy markets.¹ This is a remarkable feat and benefit for the Midwest. Grain Belt Express proposes changing the converter station planned for Missouri and seeks the

¹ Southwest Power Pool (“SPP”), Midcontinent Independent System Operator Inc., (“MISO”), and PJM LLC.

Commission's approval of said change. In addition, Grain Belt Express is offering to build the line in two phases – which is sub-optimal for the owner/operator but beneficial for Missouri. The two-phase approach will allow Missouri to receive the operational benefits of the Project earlier than it would under the construction plan approved in the current CCN.

The Project meets the **needs** of Missouri and the Midwest. Of particular relevance is the Missouri Joint Municipal Electric Utility Commission's ("MEC") need for the line to deliver low-cost energy and capacity pursuant to a contract they have signed. The Project is also needed to deliver renewable energy to utilities in MISO, PJM, Missouri, and Illinois for use in compliance with state renewable portfolio standards, to meet carbon reduction goals, and in anticipation of federal emission regulations that are on the horizon. Finally, the GBE Project is the most effective pathway for delivering low-cost renewable energy from Kansas into MISO and PJM. There is no similar transmission line currently being proposed.

The line is **economically feasible** because it will deliver wind and solar energy into Missouri, MISO, and PJM at prices equal to or lower than what are currently available. The lower price makes the energy competitive with other energy offers in the market. In addition, Grain Belt Express has agreed to comply with conditions set forth in case no. EA-2016-0358 that ensures the Project's viability and protects Missouri electric customers from post-hoc rate impacts.

The GBE Project is in the **public interest** because: it improves electric market efficiency across a large area, thus reducing wholesale electric prices in MISO, PJM and Missouri; it can be used as a cost effective replacement of energy lost due to the retirement of generating plants in the next 10-15 years; it meets demands for low cost

renewable energy from utilities and corporate electric customers in Missouri, MISO and PJM; it improves grid reliability and resilience across the Midwest; delivers renewable energy that can diversify a utility's existing generation portfolio; when the renewable energy delivered via the GBE Project offsets coal or natural gas plant operations it provides environmental benefits by reducing emissions regulated by the EPA; and it has a positive effect on Missouri's rural counties by bringing new construction jobs and new full-time permanent jobs. Overall, the Grain Belt Express Project has the unique ability to improve electric market efficiency across most of the Eastern Interconnect because it delivers clean energy at rock bottom market prices for the markets to which the energy is being delivered.

II. CRITERIA FOR CERTIFICATE OF CONVENIENCE AND NECESSITY

Grain Belt Express has applied for an amendment to its current certificate of convenience and necessity ("CCN"), pursuant to Section 393.170² and a condition in the Report and Order on Remand in case no. EA-2016-0358³. Section 393.170.1. requires Commission approval of a Project prior to start of construction. Section 393.170.3. grants the Commission authority to grant permission to build such a project after determining the Project is "necessary or convenient for the public service."

The Project's current CCN includes a condition regarding material changes as follows:

² Mo. Rev. Stat. §393.170 (2018).

³ Report and Order on Remand, Case No. EA-2016-0358, 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, ¶124 (3/20/2019).

Grain Belt and Invenergy agreed that if there are any **material changes in the design and engineering of the Project** from what is contained in the application, Grain Belt will file an updated application subject to further review and determination by the Commission.⁴ (*emphasis added*)

When making a determination of whether an applicant or project is convenient or necessary, the Commission has traditionally applied five factors, commonly known as the *Tartan* factors, which are as follows:

- a) There must be a need for the service;
- b) The applicant must be qualified to provide the proposed service;
- c) The applicant must have the financial ability to provide the service;
- d) The applicant's proposal must be economically feasible; and
- e) The service must promote the public interest.⁵

When determining whether the project is necessary or convenient for the public service, the term "necessity" does not mean "essential" or "absolutely indispensable", but that the additional service would be an improvement justifying its cost.⁶ The burden of proof is the preponderance of the evidence standard.⁷ In order to meet this standard, Grain Belt Express must convince the Commission it is "more likely than not" that its allegations are true.⁸

⁴ Report and Order on Remand, Case No. EA-2016-0358, ¶124.

⁵ In re Energy Arkansas, Inc., Order Granting Certificate of Convenience and Necessity, No. EA-2012-0321 (Mo. P.S.C. 2012); In re Tartan Energy Co., 1994 WL 762882 at *3; 3 Mo. P.S.C. 173, 177 (1994).

⁶ State ex rel. Intercon Gas, Inc. v. Pub. Serv. Commission of Missouri, 848 S.W.2d 593, 597 (Mo. Ct. App. 1993).

⁷ Bonney v. Environmental Engineering, Inc., 224 S.W.3d 109, 120 (Mo. App. 2007); State ex rel. Amrine v. Roper, 102 S.W.3d 541, 548 (Mo. banc 2003); Rodriguez v. Suzuki Motor Corp., 936 S.W.2d 104, 110 (Mo. banc 1996).

⁸ Holt v. Director of Revenue, State of Mo., 3 S.W.3d 427, 430 (Mo. App. 1999); McNear v. Rhoades, 992 S.W.2d 877, 885 (Mo. App. 1999); Rodriguez v. Suzuki Motor Corp., 936 S.W.2d 104, 109 -111 (Mo. banc 1996); Wollen v. DePaul Health Center, 828 S.W.2d 681, 685 (Mo. banc 1992).

III. ARGUMENT

A. CERTIFICATE of CONVENIENCE and NECESSITY FROM EA-2016-0358 is STILL VALID

Grain Belt Express is requesting approval of amendments that are material changes to the Project the Commission approved in case no. EA-2016-0358. In EA-2016-0358 Grain Belt Express agreed to seven categories of conditions.⁹ Paragraph 124 of the 2016 Report and Order on Remand has Invenergy voluntarily agreeing to Commission review and determination of any material changes to the design and engineering of the Project.¹⁰

In conformance with that provision, Grain Belt Express filed this “updated” application. Therefore, even if the Project as amended or updated is ultimately viewed by the Commission as worse or unable to meet the *Tartan* Factors, the certificate granted in case no. EA-2016-0358 is still valid. Moreover, the *Tartan* Factors are to be applied to the amended Project and not to each individual amendment or material change.

B. THE GRAIN BELT EXPRESS PROJECT as AMENDED MEETS THE REQUIREMENTS for a CERTIFICATE of CONVENIENCE and NECESSITY

1. THERE is a NEED for the GRAIN BELT EXPRESS PROJECT

The Project is needed primarily to bring lower cost electrical energy into Missouri for use by public utilities, municipal governments, and businesses in Missouri that have an interest in buying renewable power. The Project also delivers electricity into the Midcontinent Independent Service Operator Inc. (“MISO”), and into PJM LLC for use by public utilities and municipal governments served by PJM and MISO, and by businesses in those RTOs’ footprint that have an interest in buying renewable power. Finally, the

⁹ Report and Order on Remand, Case No. EA-2016-0358, ¶119 (3/20/2019).

¹⁰ Report and Order on Remand, Case No. EA-2016-0358, ¶124.

Project is needed for reliability and resilience in Missouri, SPP, MISO and PJM.

i. The Grain Belt Express Project is Needed Within Missouri

(a) MEC Needs its Contract Fulfilled

The Project benefits the Missouri Joint Municipal Energy Utility Cooperatives (“MEC”). MEC still has a contract for 136 MW of power using the Project. MEC still has an option to purchase an additional 64 MW of transmission capacity, totaling 200 MW from the Project.¹¹ These are the same contracts the Commission deemed sufficient to justify the need for the Project in case no. EA-2016-0358.¹²

MEC also had an independent third party – The Energy Authority (“TEA”) -- analyze the economic benefits of the amended Project. The TEA study found that the injection of 2,500 MW of renewable energy into the proposed point of interconnection (“POI”) in Missouri caused a broad flattening of locational marginal prices (“LMPs”) across the market resulting in savings across MISO of \$1.1 billion in 2028¹³. This flattening results in cost savings to MEC and other entities within the footprint analyzed by the TEA Study.¹⁴ The footprint analyzed by the TEA Study include fourteen price nodes¹⁵ in SPP, MEC, AECI, Iowa, and MISO¹⁶. The TEA study showed that LMPs in those 14 nodes had an annual average decrease ranging from \$1.10/MWh to \$37.56/MWh.¹⁷

The TEA Study performed a sensitivity analysis, evaluating the amended Project’s impact if some of the natural gas plants were still operating. The initial study retired all of

¹¹ Exh. 702, Grotzinger RTTY at 5.

¹² Report and Order on Remand, Case No. EA-2016-0358 at 41.

¹³ Exh. 702, Grotzinger RTTY at 13-14; Sched. JG-14 at 15.

¹⁴ Exh. 702, Grotzinger RTTY at 12.

¹⁵ Exh. 702, Grotzinger Sched. JG-14 at 3.

¹⁶ Exh. 702, Grotzinger RTTY at 10.

¹⁷ Exh. 702, Grotzinger RTTY at 11; Sched. JG-14 at 10

the natural gas plants. The sensitivity analysis assumed that 7.6 GW of natural gas plants would continue to operate.¹⁸ This sensitivity analysis showed that LMPs had an annual average decrease ranging from \$1.04/MWh to \$30.79/MWh.¹⁹

Relying on his 44+ years of experience in the electric utility industry²⁰, MEC witness Grotzinger interpreted the TEA Study to indicate that the Project would continue to benefit MEC throughout the life of the contract MEC has with it.²¹

(b) Missouri Utilities have a Need for Low-Cost Carbon Free Energy

Ameren Missouri and Evergy have announced carbon emission reduction goals, which will drive demand for more renewable resources beyond 2030.²² Ameren intends to accelerate fossil fuel retirements between now and 2030, and intends to replace that with a geographically diverse portfolio of resources that include renewable resources. The Project delivers just such resources into Missouri.²³ Staff witness Poudel observed that the Project is not in Ameren Missouri's Preferred Plan for Ameren's 2020 Integrated Resource Plan.²⁴ One reason it was not in Ameren Missouri's Preferred Plan is that Ameren gave the Project a lower score for not yet having regulatory approvals in all states.²⁵ It now has such approval. From a policy perspective, Ameren's IRP confirms that procuring large amounts of low-cost renewable energy, like that delivered via the Project,

¹⁸ Exh. 702, Grotzinger RTTY at 12-13; Sched JG-14 at 7.

¹⁹ Exh. 702, Grotzinger RTTY at 13; Sched. JG-14 at 9

²⁰ Exh. 702, Grotzinger RTTY at 2, Sched JG-2.

²¹ Exh. 702, Grotzinger RTTY at 13-14.

²² Exh. 1, Direct Testimony of Shashank Sane and accompanying schedules SS-1 through SS-3 ("Sane DTTY") at 13-14.

²³ Exh. 1, Sane DTTY at 14 see also Exh. 600, Rebuttal Testimony of Michael Goggin submitted on behalf of Clean Grid Alliance ("Goggin RTTY") at 23.

²⁴ Exh. 105, Rebuttal Testimony of Krishna Poudel and attached schedules ("Poudel RTTY") at 3.

²⁵ Exh. 600, Goggin RTTY at 24.

is the best option for achieving carbon reduction goals.²⁶

In its 2020 Integrated Resources Plan (EO-2021-0035), Evergy announced the acceleration of the company's carbon reduction timeline. As part of the plan, Evergy will retire nearly 1,200 megawatts of coal-based fossil generation and add 3,200 MW of renewable generation in the next 10 years. The plan prioritizes sustainability, reliability and cost competitiveness, while advancing Evergy's goal to reduce carbon emissions 70 percent by 2030 (relative to 2005 levels) and achieve net-zero carbon emissions by 2045.²⁷ Evergy had stated that

Until large scale investments in transmission upgrades are made, the timing of future renewable resource additions in that region will be difficult to determine with certainty. This could lead to output and/or delivery limitations on future renewable resource additions in the southwest Kansas region.²⁸

CGA witness Goggin notes that that statement confirms that the Project is essential for the Midwest, including Missouri, to access the low-cost renewable resources available in southwest Kansas.²⁹

**(c) Market Demand for Renewable Energy and RECs
Demonstrates Need**

Grain Belt Express witness Sane also notes that Grain Belt Express has entered into a number of Memorandums of Understanding ("MOUs") with major commercial and industrial customers, and with electric utilities for transmission capacity and a Letter of Intent.³⁰ These MOUs demonstrate an interest in contracting for capacity on the line.

²⁶ Exh. 600, Goggin RTTY at 24.

²⁷ Exh. 1, Sane DTTY at 14-15.

²⁸ Exh. 600, Goggin RTTY at 24-25.

²⁹ Exh. 600, Goggin RTTY at 24-25.

³⁰ Exh. 1, Sane DTTY at 13; Exh. 2, Surrebuttal Testimony of Shashank Sane and accompanying schedule SS-4 ("Sane SRTTY") at 14-15.

Further, Witness Sane lists a number of Clean Energy Buyers in Missouri that have renewable energy commitments, and Missouri municipal governments that have made pledges to increase their use of renewable energy in city facilities³¹ as examples of potential off-takers beyond entities that had entered into MOUs.³²

Beyond the MOUs and a Letter of Intent, MEC has testified that its demand for renewable resources is unmet, and that other members of MEC are likely to seize the opportunity for renewable resources after the Project receives regulatory certainty. MEC pointed toward the Missouri Public Energy Pool (“MOPEP”) has 35 members.³³ Its demand for renewable energy could grow from 15% to 25% if the Project comes online.³⁴ MEC’s Mid-Missouri Municipal Power Energy Pool (“MMMPEP”) may also consider the opportunity to participate in the Project if this proposed amendment to interconnect into AECI is approved by the Commission.³⁵ The demand from MMMPEP’s could cause MEC to exceed the 200 MW limit of its current contract with Grain Belt Express.³⁶

Finally, there is general demand for clean energy by corporate and industrial customers. A significant portion of U.S. corporations with sustainability goals are in the MISO footprint and could be served from the injection point in Missouri. In 2021, corporate buyers procured approximately 11,000 MW of power from renewable sources. Corporate demand is projected to increase in beyond 2021 demand levels. Of the corporate energy deals completed to-date, 22% are in PJM and 13% are in MISO.³⁷ That is approximately 1,430 MW of corporate demand in the MISO footprint – far exceeding the

³¹ Exh. 1, Sane DTTY at 15.

³² Exh. 1, Sane DTTY at 15.

³³ Exh. 702, Grotzinger RTTY at 5.

³⁴ Exh. 702, Grotzinger RTTY at 8.

³⁵ Exh. 702, Grotzinger RTTY at 6.

³⁶ Exh. 702, Grotzinger RTTY at 6-7.

³⁷ Exh. 1, Sane DTTY at 11.

500 MW approved under the current certificate. Moreover, Grain Belt Express has negotiated several MOUs with major commercial and industrial customers, and electric utilities for capacity on the Project.³⁸

If the potential demand for renewable energy or RECs described above is not found to be a need³⁹, then it certainly demonstrates public interest within the scope of the *Tartan* Factors.

ii. There is a Regional Need for the Grain Belt Express Project

MISO commissioned a study to assess the clean energy goals of utilities in its footprint through 2040. The study found 28 MISO utilities have carbon reduction goals and 26 have renewable energy goals.⁴⁰ A public report that independently corroborates MISO's study is a S&P Global report from December 2021. S&P reported that 70% of the 30 largest U.S. electric and gas utilities have net-zero equivalent targets or were moving to comply with carbon emission reduction mandates, and the vast number of these utilities reside in MISO and PJM.⁴¹ All of these entities are potential customers for the Project, particularly in light of the economic feasibility discussion in section III.B.2 (*below*).

An example of one of these utilities is the Tennessee Valley Authority. It has a goal of reducing generation emissions by 80% by 2035, and aggressively looking to add 10,000 megawatts of solar energy nameplate capacity by 2035. Grain Belt witness Sane says the Project has the capability of providing transmission capacity for TVAs need.⁴²

³⁸ Exh. 2, Sane SRTTY at 14; Exh. 1, Sane DTTY at 13 and 31.

³⁹ State ex rel. Intercon Gas, 848 S.W.2d 593, 597, stating that whether a project is necessary does not mean a project is "essential" or "absolutely indispensable", but provides an improvement in service that is justified by its cost.

⁴⁰ Exh. 1, Sane DTTY at 16.

⁴¹ Exh. 1, Sane DTTY at 15.

⁴² Exh. 1, Sane DTTY at 16.

Besides Missouri, the Project passes through three other states. Each of those states have approved the line. Approvals by those three other states demonstrate a regional need for the Project.

If the benefits the Project can provide to entities outside of Missouri is not found to be an additional service justifying the Project's cost⁴³, then these benefits most certainly demonstrate a public interest within the scope of the *Tartan* Factors.

iii. The Grain Belt Express Project is Needed Because it Improves Reliability and Resilience and Reduces Ratepayers Rates

The Project provides an interregional connection across the Midwest's RTOs – SPP, MISO, AECI, and PJM – that can be used by any of these grid operators when their system is stressed by specific events, which demonstrates the Project's ability to improve resilience.⁴⁴ It also improves reliability by expanding transmission capacity so customers have a dependable source of power to homes, schools and businesses.⁴⁵

The Project is designed to carry 5,000 MW of renewable resources from Kansas to AECI, MISO, PJM, Missouri, Indiana, and Illinois and inject 2,500 MW of renewable generation power into AECI/MISO/Missouri and the remaining 2,500 MW into PJM/Indiana/Illinois. That power can address reliability concerns in those regions as utilities retire fossil-fuel plants and transition to a clean energy portfolio of generation.⁴⁶ The reliability benefit the Project provides is due to the distance between the power production point and the power delivery point. This distance creates geographic diversity – where the wind and solar generating facilities at the power production point are not

⁴³ State ex rel. Intercon Gas, 848 S.W.2d 593, 597.

⁴⁴ Exh. 1, Sane DTTY at 17.

⁴⁵ Exh. 1, Sane DTTY at 18.

⁴⁶ Exh. 1, Sane DTTY at 20:10-14.

strongly correlated (*i.e.*, producing energy at the same time) with the wind and solar generating facilities at the power delivery point. This diversity produces multiple reliability benefits – it reduces the overall variability of renewable resources serving Missouri and Illinois, increases the reliability of renewable generation as a supply source to Missouri and Illinois, and reduces the costs of renewable generation integration into the Missouri and Illinois supply portfolios.⁴⁷ The geographic distance or diversity of resources creates the ability for a region that is experiencing an emergency or extreme weather event to pull or use resources from a neighboring RTO who is not experiencing the emergency.⁴⁸

In its 2022 Summer Reliability Assessment, NERC outlined grave concerns about expected capacity shortfalls in MISO, putting the ISO at a “high risk of energy emergencies during peak summer conditions” and further noting “[m]ore extreme temperatures, higher generation outages, or low wind conditions expose the MISO North and Central areas to higher risk of temporary operator-initiated load shedding to maintain system reliability.”⁴⁹ The Project has the ability to reduce the risk of disruption during these extreme weather events.⁵⁰ Grain Belt Express witness Sane and CGA witness Goggin provide examples of weather impacts from Winter Storms Uri or Elliott that could have been mitigated by the Project.⁵¹

Grain Belt Express witness Petti quantified the economic savings the Project could provide via improved reliability and resiliency in the Midwest. Petti evaluated the

⁴⁷ Exh. 1, Sane DTTY at 20.

⁴⁸ Exh. 1, Sane DTTY at 24; Exh. 2, Sane SRTTY at 6; Exh. 600, Goggin RTTY at 30 and 31; Exh. 850, Rebuttal Testimony of Michael Milligan and accompanying sched. MM-1 through MM-13, at 19:2-6.

⁴⁹ Exh. 1, Sane DTTY at 18.

⁵⁰ Exh. 1, Sane DTTY at 19.

⁵¹ Exh. 1, Sane DTTY at 21-23; Exh. 600, Goggin DTTY at 29-32.

following benefits and consequential savings:

Table 1: Summary of Resilience and Reliability Benefits⁵²

Improvement and Benefit	Savings
Mitigation of high energy prices during extreme weather events – using Winter Storm Uri as an example	\$300M ⁵³
Value of avoided loss of load benefits	\$360M to \$2.37B over 30 yrs ⁵⁴
Reduced local resource adequacy procurement obligations	\$7.6B over 30 years ⁵⁵
Hedges against future capacity procurement needs	See Petti testimony for description ⁵⁶
Avoid high Planning Resource Auction prices	\$28M to \$33M of annual savings ⁵⁷
Value of system restoration capabilities	See Petti testimony for description ⁵⁸
HVDC resource reliability/operational flexibility	See Petti testimony for description ⁵⁹

These cost savings combined with the cost savings identified by Grain Belt Express witness Repsher (*see* section III.B.2. (*below*)) exceed the cost of the Project over the life of the Project. These combined cost savings support a finding that the additional reliability and resilience benefits are needed.

⁵² Exh. 11, Direct Testimony of Anthony Petti (adopted by Robert Baker) and accompanying Sched. AP-1 and AP-2 (“Petti DTTY”) at 7 and Sched AP-2 at 5-7.

⁵³ Exh. 11, Petti DTTY at 7; Sched. AP-2 at 10-16.

⁵⁴ Exh. 11, Petti DTTY at 8; Sched. AP-2 at 16-22.

⁵⁵ Exh. 11, Petti DTTY at 9; Sched. AP-2 at 22.

⁵⁶ Exh. 11, Petti DTTY at 9-10; Sched. AP-2 at 22-28.

⁵⁷ Exh. 11, Petti DTTY at 11; Sched. AP-2 at 28-32.

⁵⁸ Exh. 11, Petti DTTY at 11; Sched. AP-2 at 33-35.

⁵⁹ Exh. 11, Petti DTTY at 11-12; Sched. AP-2 at 35-38.

CGA witness Goggin analyzed the potential economic benefits the Project could provide if it had been in operation during Winter Storm Elliott. Winter Storm Elliott affected SPP, MISO, and PJM in December 2022. His results showed that SPP, MISO, and PJM could have saved between \$39 and \$80 million⁶⁰ because the Project would have provided needed power and reduced the overall variability of prices during the storm.⁶¹

If reliability and resilience are not found to be an additional service justifying the Project's cost⁶², then these benefits most certainly demonstrate a public interest within the scope of the Tartan Factors.

2. THE GRAIN BELT PROJECT is ECONOMICALLY FEASIBLE

Grain Belt Express's current certificate was found economically feasible after reviewing a number of factors, and most of those factors are still applicable. The Project is linking Missouri to renewable power from Kansas that is lower cost than similar resources in Missouri. The PA Consulting Report calculates energy and capacity savings the Amended Project provides Missouri ratepayers beyond what could be provided by the Certificated Project. That savings indicates that the electricity imported via the Project would be competitive in the wholesale electricity market, and therefore the project is a viable project and is economically feasible.

Economic feasibility is tied to the financial functioning of the proposed project once it's been built. In *Tartan*, the Commission discussed at length whether Tartan Energy Company's ("Tartan Energy") estimated future rates for its product were

⁶⁰ Exh. 600, Goggin RTTY at 31.

⁶¹ Exh. 600, Goggin RTTY at 31-32.

⁶² State ex rel. Intercon Gas, 848 S.W.2d 593, 597, stating that whether a project is necessary does not mean a project is "essential" or "absolutely indispensable", but provides an improvement in service that is justified by its cost.

sufficiently persuasive and “objectively reasonable.”⁶³ One aspect of rate estimation the Commission evaluated was whether the rates for natural gas would be competitive with propane, because if they were not, nobody would buy gas and the project “would not be feasible based on those numbers.” A second concerns of the Commission was risk allocation and providing “reasonable protection to customers against the possibility . . .” of markets markedly deviating from the economic or market analysis⁶⁴ so as to “protect customer from bearing the cost of underestimation” or error.⁶⁵ In analyzing this, the Commission weighed Tartan Energy’s willingness to agree to a condition that “adequately protects” ratepayers from later rate hikes. In *Tartan*, Tartan Energy was willing to take on all the financial risk, so it would not shift to ratepayers.⁶⁶ The Commission, in *Tartan*, used an “objectively reasonable” standard for estimation of rates, emphasizing “that these costs cannot be known with any certainty prior to the development of the system.”⁶⁷ The similarities between *Tartan* and this case are striking.

On the first factor, the PA Consulting Report and CGA witness Goggin forecast the savings the Amended/Updated Project⁶⁸ provides, in comparison to the Certificated Project⁶⁹, and explain that that savings demonstrates that the Amended Project is economically feasible. The economic analysis in this case (“PA Consulting Report”) models how the electric market in the Eastern Interconnection would operate with the Amended Project in place (*i.e.*, injecting 2,500 MW of energy into Missouri) and found that

⁶³ In re Tartan Energy Co., 1994 WL 762882 at *11 and *12; 3 Mo. P.S.C. 173 (1994).

⁶⁴ In re Tartan Energy Co., 1994 WL 762882 at *11; 3 Mo. P.S.C. 173.

⁶⁵ In re Tartan Energy Co., 1994 WL 762882 at *12; 3 Mo. P.S.C. 173.

⁶⁶ In re Tartan Energy Co., 1994 WL 762882 at *14; 3 Mo. P.S.C. 173.

⁶⁷ In re Tartan Energy Co., 1994 WL 762882 at *12; 3 Mo. P.S.C. 173.

⁶⁸ Application to Amend Existing Certificate of Public Convenience and Necessity (“Application”), at ¶¶19-34 (8/24/2022).

⁶⁹ Application, at ¶¶14-18.

the Amended Project saved Missouri ratepayers more money than the Certificated Project (*i.e.*, injecting 500 MW of energy into Missouri) over the lifetime of the project.⁷⁰ The economic analysis in this case uses a computer program that simulates the hourly operation and dispatch of generation in the existing Eastern Interconnection of the United States. The computer program Grain Belt's witness Repsher used was Aurora. It is a widely used electric generation dispatch simulation model. Aurora is used by electric utilities, power market regulators, independent system operators, and energy market consultants.⁷¹ Aurora uses numerous inputs to project hourly prices, energy flows, the development of new powerplants, the operation of the power plants, and the congestion along transmission lines in the Eastern Interconnect. Using this data the model can calculate energy and capacity market savings at specific locations in SPP, MISO and Missouri.⁷² This model is intended to capture the hourly change in electricity prices, which translates into hourly costs passed along to Missouri ratepayers.

The PA Consulting analysis compared the cost of energy and capacity under two configurations of the Grain Belt Express Project that represent the Amended Project and the Certificated Project. The PA Consulting Report states that the Amended Project (that has the potential to inject up to 2,500 MW into Missouri and 2,500 MW into PJM) would provide energy and capacity savings to Missouri from 2027 through 2066 of approximately \$17.6 billion⁷³ more than the Certificated Project. In addition, the Amended Project also provides societal benefits from reduced emissions, which witness Repsher estimates to be \$7.6 billion between 2027 and 2066 – bringing the cumulative

⁷⁰ Exh. 3, Repsher DTTY at 8-9, Sched. MR-2 at 11 of 20; *see also*, Exh. 1, Sane DTTY 6:22-23, 7:18 to 9:2, and 20:5-8 *describing* the Amended/Updated Project and the Certificated Project.

⁷¹ Exh. 3, Repsher DTTY at 8-9.

⁷² Exh. 3, Repsher DTTY at 8-9.

⁷³ Exh. 3, Repsher DTTY at 18; Sched. MR-2 at 13

benefit to Missouri to \$25.3 billion.⁷⁴

The savings in energy and capacity costs, without the societal cost savings, far exceeds the \$5.7 billion cost to build the Project⁷⁵ or the reliability and resilience savings estimated in the Guidehouse Report⁷⁶. Thus, Grain Belt Express witness Repsher concludes that the difference between the \$17.6 billion in energy and capacity savings compared to the \$5.7 billion in project cost is substantial enough for ratepayers to absorb the Grain Belt Express investment in the Project.⁷⁷

The difference in cost savings, between the Amended Project and the Certificated Project, of \$17.6 billion also means that the Amended Project is economically feasible based on forecasted market operations. The Aurora model simulates the operation of the Eastern Interconnection, selecting the lowest cost generators to meet energy and capacity needs of the Eastern Interconnect. The Amended Project's larger cost savings demonstrates economic feasibility in two ways. First, it shows that Missouri utilities that sign power purchase agreements ("PPAs") for low-cost renewable generation delivered via the Project can directly reduce their cost to serve their customers.⁷⁸ Second, even if utilities do not purchase electricity from the Project via a PPA "Missouri ratepayers will still enjoy the benefit of the price suppression induced by the Project"⁷⁹ as calculated by the PA Consulting analysis.

The reason Missouri experiences these savings is because the wind and solar resources in Kansas are better than similarly sized resources in Missouri.⁸⁰ CGA witness

⁷⁴ Exh. 3, Repsher DTTY Sched. MR-2 at 13.

⁷⁵ Exh. 3, Repsher DTTY at 18.

⁷⁶ Exh. 11, Petti DTTY, Sched. AP-2

⁷⁷ Exh. 3, Repsher DTTY at 18.

⁷⁸ Exh. 600, Goggin DTTY at 26:535-537.

⁷⁹ Exh. 3, Repsher DTTY at 10:18 to 11:1 and 13:14-18; Exh. 601, Goggin SRTTY at 3:59-63,

⁸⁰ Exh. 3 Repsher DTTY at 7:7 to 9:6.

Goggin explains how the wind and solar resources in Kansas are among the best in the United States. They have high-capacity factors, therefore, they will produce more energy than systems with lower capacity factors. Producing more energy allows wind and solar generating resources in Kansas to recoup their costs and turn a profit at a lower per kilowatt rate than wind and solar resources with lower capacity factors.⁸¹ Mr. Goggin also explains how the lower per kilowatt hour rate translates into SPP having lower power purchase agreement prices for wind and solar than MISO.⁸² What this tells us is that the Project is economically feasible because projects in Kansas (which are in SPP) will be able to compete in price with projects in Missouri (that are in MISO).⁸³

CGA witness Goggin also performed an economic analysis and found the Project to be economically feasible. Mr. Goggin's analysis used historical PPA prices from SPP and from MISO. His analysis showed that power purchase agreements for wind and solar projects in SPP were significantly lower than PPAs for similar sized projects in MISO. Mr. Goggin concluded that the lower cost of Kansas wind and solar resources indicates that the Project is economically feasible.⁸⁴ Mr. Goggin also noted that the data he used pre-dated the Inflation Reduction Act.⁸⁵ His analysis, therefore, did not account for the additional price reductions the Inflation Reduction Act will make available, post 2026, to wind and solar projects that interconnect to the Grain Belt Express Project. Wind and solar projects in Kansas will receive a larger cost reduction from the Production Tax Credit than those in Missouri because Kansas projects can produce more energy than the

⁸¹ Exh. 600, Goggin DTTY at 4-7.

⁸² Exh. 600, Goggin DTTY 8-9.

⁸³ Exh. 600, Goggin DTTY at 8-9.

⁸⁴ Exh. 600, Goggin DTTY at 8.

⁸⁵ Exh. 600, Goggin DTTY at 8-9.

same size utility-scale wind or solar resource in Missouri or MISO.⁸⁶ This means that renewable resources delivered via the Project can offer an even lower price than what is reflected in historical PPAs, and therefore are more likely to be competitive within the MISO and PJM energy markets.

The PA Consulting Report is valid and reasonable, even after Staff's inquiries. Staff witnesses Stahlman, Eubanks and Poudel raised questions about the PA Consulting Report in their rebuttal testimonies.⁸⁷ Grain Belt Express witness Repsher answered each of their inquiries, and afterwards he concluded that none of the issues raised by Staff established a need for him to revise or update his analysis.⁸⁸ Thus the PA Consulting Report's information, analysis and estimated cost savings supports a finding that the Project is economically feasible.

Finally, the conditions Grain Belt Express has agreed to comply with reinforce the economic analysis that demonstrates economic feasibility, and provides assurance that the Project is viable prior to being placed in service. In *Tartan*, the Commission placed great weight on Tartan Energy's willingness to agree to a condition that "adequately protects" ratepayers from later rate hikes. Similar to Tartan Energy, Grain Belt Express agreed to comply with conditions set forth in EA-2016-0358 that would protect Missouri electric customers by not allowing the Amended Project to move forward until financing is secured. Condition 1 of Attachment 1 to the Final Report and Order in EA-2016-0358 has Grain Belt Express assuming the financial risk of building and operating the

⁸⁶ Exh. 600, Goggin DTTY at 9.

⁸⁷ Exh. 4, Repsher SRTTY at 4-13; Exh. 107, Rebuttal Testimony of Michael L. Stahlman ("Stahlman RTTY") at 4-7; Exh. 105, Poudel RTTY at 4-6.

⁸⁸ Exh. 4, Repsher SRTTY at 14.

transmission line.⁸⁹ In addition, Grain Belt Express will not attempt to recover the cost of the Project from Missouri ratepayers through either SPP or MISO cost allocation tariffs.⁹⁰ The one change with this amendment/update relates to the requested Phasing of the Project. Grain Belt Express will be required to have full financing in place **for each respective phase of the Project before construction begins on that phase.**⁹¹ This assumption of the financial risk by Grain Belt Express under these two conditions means the Project does not move forward until it has financing, which minimizes, if not removes, the risk of Missouri ratepayers being economically harmed by the Project.

The approach used to demonstrate economic feasibility, in this case, is similar to what the Commission has approved in *Tartan* and in EA-2016-0358. The PA Consulting Report and CGA witness Goggin’s economic analyses in combination with appropriate conditions ensure the Projects’ economic feasibility. The economic analyses are to demonstrate the likelihood the Project will garner sufficient investors to cover the Project’s costs. The conditions act as a backstop to the analyses by setting appropriate circumstances to be met to protect Missouri ratepayers. In this instance the conditions ensure Grain Belt Express will have sufficient financing prior to start of construction.

3. THE GRAIN BELT PROJECT is in the PUBLIC INTEREST

The determination of public interest is a matter of policy the legislature has granted to the Commission.⁹² It is within the discretion of the Commission to determine

⁸⁹ Application, ¶¶ 85 and 86; Exh. 19, Direct Testimony of Kevin Chandler and accompanying sched. KC-1 through KC-6 (“Chandler DTTY”) at 17:14-17.

⁹⁰ Application, ¶85; Exh. 2, Sane SRTY at 11:12-15.

⁹¹ Application, ¶86; Exh. 19, Chandler DTTY at 18:11 to 19:18.

⁹² State ex rel. Public Water Supply District v. Public Service Commission, 600 S.W.2d 147, 154 (Mo. App. 1980). The dominant purpose in creation of the Commission is public welfare. State ex rel. Mo. Pac. Freight Transport Co. v. Public Service Commission, 288 S.W.2d 679, 682 (Mo. App. 1956).

when the evidence indicates the public interest would be served.⁹³ Determining what is in the interest of the public is a balancing process.⁹⁴ In making such a determination, the total interests of the public served must be assessed.⁹⁵ In Missouri, state energy policy can be found in laws such as the Renewable Energy Standard⁹⁶ and the Energy Efficiency Investment Act⁹⁷, as well as the Comprehensive State Energy Plan, an initiative implemented by the Missouri Division of Energy in 2015. Consistent with these state policies, this Commission has in the past expressed strong support for the “development of economical renewable energy sources to provide safe, reliable, and affordable service while improving the environment and reducing the amount of carbon dioxide released into the atmosphere”.⁹⁸ “The requirement that an applicant's proposal promote the public interest is in essence a conclusory finding. . . . Generally speaking, positive findings with respect to the other four standards will in most instances support a finding that an application for a certificate of convenience and necessity will promote the public interest.”⁹⁹

With regard to the public interest of the Project, in case no. EA-2016-0358 the Commission made the following finding:

There can be no debate that our energy future will require more diversity in energy resources, particularly renewable resources. We are witnessing a worldwide, long term and comprehensive movement towards renewable energy in general and wind energy specifically.

⁹³ State ex rel. Intercon Gas, 848 S.W.2d 593, 597.

⁹⁴ Report and Order, Case No. EO-93-0259, In the Matter of Sho-Me Power Electric Cooperative's Conversion from a Chapter 351 Corporation to a Chapter 394 Rural Electric Cooperative, 1993 WL 719871 (Mo. P.S.C. 9/17/1993).

⁹⁵ Id.

⁹⁶ Section 393.1030, RSMo.

⁹⁷ Section 393.1075, RSMo.

⁹⁸ Report and Order, Case No. EA-2015-0256, In the Matter of the Application of KPC&L Greater Missouri Operations Company for Permission and Approval of a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage Solar Generation Facilities in Western Missouri, at 15 (3/2/2016).

⁹⁹ In re Tartan, 1994 WL 762882 at *14; 3 Mo.P.S.C.3d at 189.

Wind energy provides great promise as a source for affordable, reliable, safe, and environmentally-friendly energy. The Grain Belt Express Project will facilitate this movement in Missouri, will thereby benefit Missouri citizens, and is, therefore, in the public interest.¹⁰⁰

This statement is still applicable to the amended Project, as CGA explains in section III.B.1.i(c) (*above*).

i. The Project's Reduction of Missouri Ratepayers Energy and Capacity Costs are in the Public Interest

As explained in section III.B.2. (*above*), above, the Project is forecasted to reduce the overall cost of electricity – energy and capacity – for Missouri ratepayers.¹⁰¹ If a service is likely to reduce ratepayers' rates then the service is in the public interest. Grain Belt Express witness Repsher analyzed the Project's impact on the whole Eastern Interconnect, calculating the potential cost savings for Missouri as \$17.6 billion from 2026 to 2066, the presumed life of the Project.¹⁰² This cost savings far exceeds the forecasted cost of the entire line which is \$5.7 billion.¹⁰³ Moreover, even if no additional in-State entities contract for the Project's output, Missouri ratepayers will still experience price suppression effects of the Project when it injects energy into MISO and AECL.¹⁰⁴ CGA witness Goggin shares the same perspective.¹⁰⁵ CGA witness Goggin explains how the wind and solar resources are better in Kansas than in Missouri and therefore will operate at a lower cost. Mr. Goggin also presented information that recent power purchase agreement prices of wind and solar projects in SPP are lower than those in MISO, thus indicating an opportunity for Missouri ratepayers to save money if Missouri utilities sign

¹⁰⁰ Report Order on Remand, Case No. EA-2016-0358 at 47.

¹⁰¹ Exh. 3, Repsher DTTY at 6.

¹⁰² Exh. 3, Repsher DTTY at 6, 13, and 18, and Sched. MR-2 at 4, 7-8, 14 (red text).

¹⁰³ Exh. 3, Repsher DTTY at 18. The cost of the Phase I portion of the line is estimated to be \$3.52 billion (excluding cost of network upgrades). Application at ¶77.

¹⁰⁴ Exh. 3, Repsher DTTY at 13.

¹⁰⁵ Exh. 600, Goggin DTTY at 4-23 and 25-29.

PPAs that use the Project or even if they do not.¹⁰⁶

ii. The Project's Reliability and Resilience Benefits are in the Public Interest

The Project provides an interregional connection across the Midwest's RTOs – SPP, MISO, AECI and PJM – that can be used by any of these grid operators when their system is stressed by specific events. The ability for the Project to be used to meet extreme weather or stressed system events shows that the Project provides resilience benefits.¹⁰⁷ The Project also improves reliability by expanding transmission capacity so customers have a dependable source of power to homes, schools and businesses.¹⁰⁸

Grain Belt Express witness Petti prepared the Guidehouse Report which described how the Project would affect the reliability and resiliency of the transmission system in Missouri and other states.¹⁰⁹ Petti also quantified the economic savings of the improved reliability and resiliency. would provide across four specific improvements (see Table 1 (*above*)).

CGA witness Goggin also performed a resilience analysis. He analyzed the potential economic benefits the Project could have provided if it had been in operation during Winter Storm Elliott. Winter Storm Elliott affected SPP, MISO and PJM in December 2022. His results showed that SPP, MISO and PJM could have saved between \$39 and \$80 million¹¹⁰ because the Project would have provided needed power and reduced the overall variability of prices during the storm.¹¹¹

¹⁰⁶ Exh. 600, Goggin DTTY at 8-9, 26-27; Repsher DTTY at 13.

¹⁰⁷ Exh. 1, Sane DTTY at 17.

¹⁰⁸ Exh. 1, Sane DTTY at 18.

¹⁰⁹ Exh. 11, Petti DTTY at 7.

¹¹⁰ Exh. 600, Goggin RTTY at 31.

¹¹¹ Exh. 600, Goggin RTTY at 31-32.

iii. The Project's Qualitative Operational and Reliability Benefits are in the Public Interest

The Project has the ability to provide bi-directional flow and black-start¹¹² capability, and can replace lost operations when plants retire. The bi-directional and black-start functions have not yet been approved by the applicable RTOs. That is a matter of application to and review by the RTO, and compliance with any identified upgrades to allow the request to be feasible. The Commission should not completely discount the operational benefits of bi-directional flow and black-start service, but give this optionality the weight it deserves as a public interest.¹¹³

When existing plants retire the RTO may experience a loss in operational flexibility, such as ancillary services, or loss of capacity or drop in Planning Reserve Margin Requirements. The Voltage Source Converter technology¹¹⁴ proposed for the Amended Project, which converts the DC to AC, can provide quality control operations that are typically provided by a synchronous generator. It can control active and reactive power, provide a hedge against future investment in static synchronous compensators and static VAR compensators, provide dynamic voltage support, emergency power control and power modulation, damping of electro-mechanical oscillations, and voltage and frequency control.¹¹⁵

The Project also provides a hedge against future capacity needs.¹¹⁶ The increase in generating plant retirements, due to economics, will likely accelerate the frequency of new transmission constraints and generation capacity deficiencies. These deficiencies

¹¹² Exh. 11, Petti DTTY, Sched AP-2 at 34.

¹¹³ Exh. 8, Surrebuttal Testimony of Carlos Rodriguez ("Rodriguez SRTTY") at 11-13.

¹¹⁴ Exh. 11, Petti DTTY, Sched. AP-2 §6 *describing capabilities of a Voltage Source Converter*.

¹¹⁵ Exh. 11, Petti DTTY, Shed AP-2 at 34-36.

¹¹⁶ Exh. 11, Petti DTTY, Sched AP-2 at 8.

leave regulators, system planners, and utilities very little time to react and plan cost-effective solutions. The additional energy and capacity the Project brings to the MISO and PJM systems can provide needed services until transmission planners take steps to (1) procure emergency or additional capacity; (2) plan transmission system upgrades; or (3) identify generators that must be designated as must run. All of these alternatives create a cost burden on all utilities in the RTO.¹¹⁷

iv. The Project's Societal Benefits are in the Public Interest

Grain Belt Witness Repsher estimated that the Project will provide societal benefits from reduced emissions from fossil fuel plants, totaling \$7.6 billion.¹¹⁸ CGA witness Goggin independently forecasted that the Project would reduce emissions from fossil fuel plants in the Midwest and Mid-Atlantic regions.¹¹⁹

The emission reduction estimates that Grain Belt witness Repsher and CGA witness Goggin prepared will only increase if the U.S. Environmental Protection Agency develops new rules to regulate carbon dioxide emissions from existing and new power plants. Pursuant to sections 111(d) and 111(b) of the Clean Air Act, the U.S. EPA regulates emissions that cause or significantly contribute to air pollution that may endanger public health or welfare. The EPA has already determined that carbon dioxide does endanger public health or welfare. While it is not yet known what form EPA's rule for existing power plants will take, the *West Virginia vs. EPA* Supreme Court¹²⁰ ruling in June 2022 indicates that the EPA will increase costs for existing fossil-fuel power plants by requiring

¹¹⁷ Exh. 11, Petti DTTY, Sched AP-2 at 23-24.

¹¹⁸ Exh. 3, Repsher DTTY at 15.

¹¹⁹ Exh. 600, Goggin DTTY at 32-34, and Sched. MG-11.

¹²⁰ *West Virginia vs. EPA*, 597 U.S. __ (2022); 142 S. Ct. 2587; 2022 WL 2347278, (U.S. June 2022)

investments or operational changes that reduce emission of carbon dioxide.¹²¹ Other pending, proposed, and recently finalized EPA rules are likely to add further costs to the operation of new and existing fossil-fired power plants, including the national soot standard, national smog standard, the Good Neighbor Rule, the Mercury and Air Toxics Standard, and new rules on coal ash and regional haze.¹²² Increased regulation of carbon dioxide emissions will increase the cost of electricity generated by fossil-fuel powered plants. An increase in cost of electricity from those plants will make the already low-cost electricity from wind and solar plants in Kansas more affordable or competitive in Missouri, MISO, and PJM.

v. The Project's Local Economic Benefits are in the Public Interest

Grain Belt Express witness and Prof. Emeritus David Loomis, who has over 25 years of teaching energy economics and 12 years of experience performing local economic impact studies, analyzed the Project's local economic impacts.¹²³ He found that the Project would create the equivalent of 5,747 full-time construction jobs in Missouri. The Project will also support the equivalent of 104+ full-time jobs in the state. The construction jobs would demand approximately \$586 million in wages, and operations would demand approximately \$8M annually.¹²⁴ These jobs would not occur if the Project is not built, because there is no alternative project that would be built if this is not built.¹²⁵

¹²¹ Exh. 600, Goggin DTTY at 35.

¹²² Exh. 600, Goggin DTTY at 35.

¹²³ Exh. 21, Direct Testimony of David Loomis and accompanying schedules DL-1 and DL-2 ("Loomis DTTY"), Sched. DL-1

¹²⁴ Exh. 21, Loomis DTTY at 8.

¹²⁵ Exh. 22, Surrebuttal Testimony of David Loomis ("Loomis SRTTY") at 4-5.

vi. Market Demand for Renewable Energy and RECs in PJM and MISO Demonstrate Public Interest

The demand for renewable energy and RECs by: (1) Missouri utilities, (2) corporations with sustainability goal needs that are electric customers in-state, within MISO, in Illinois, in Indiana, or in PJM, or by (3) Tennessee Valley Authority and utilities similarly situated as TVA, demonstrate public interest in the Project. Further details are provided in section III.B.1.i(c) (*above*).

viii. Phased Construction is in the Public Interest

Constructing the Amended Project in two phases is in the public interest of Missouri because it will allow the benefits to Missouri accrue much earlier than would otherwise be possible. Demand for resources provided via the Project has increased substantially in MISO and AECI.¹²⁶ Once the 2,500 MW that delivers into Missouri is under contract, it will support Phase I construction and is sufficient for Phase I to operate without having Phase II built.¹²⁷

In March 2023, the Illinois Commerce Commission granted Grain Belt Express a Certificate of Public Convenience and Necessity (“CPCN”) to own, operate, control and manage the line through Illinois.¹²⁸ Because a certificate allowing the Project to be built through Illinois was just awarded, land acquisition in Illinois is far behind that of Kansas and Missouri – it is in early stages. Grain Belt Express witness Chandler estimates it will take two or more years for Illinois to obtain the necessary rights for land in Illinois.¹²⁹ Therefore, approving a two-phase construction process creates the potential for Missouri

¹²⁶ Exh. 1, Sane DTTY At 11-15; Exh. 2, Sane SRTTY at 17.

¹²⁷ Exh. 2, Sane SRTTY at 17.

¹²⁸ Exh. 2, Sane SRTTY at 4-5.

¹²⁹ Exh. 20, Surrebuttal Testimony of Kevin Chandler and accompanying sched. KC-6 through KC-7, at 6.

to receive the benefits of the Project and not be delayed 2+ years for the Illinois portion of the Project to secure land rights.

IV. CONCLUSION AND REQUESTED RELIEF

Wherefore, Clean Grid Alliance respectfully requests that the Commission find that the Grain Belt Express Project [1] is needed, [2] is economically feasible, and [3] is in the public interest, and requests the Commission amend or update Grain Belt Express's certificate of convenience and necessity to construct, own, control, manage, operate and maintain the Project through Missouri.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that this Brief was electronically served upon all parties to this case on July 7, 2023.

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