

**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, Control,) **Case No. EA-2016-0358**
Manage, Operate 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)

**MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT’S
STATEMENT OF POSITIONS WITH RESPECT TO REMAND**

The Missouri Department of Economic Development (“DED”) submits this Statement with the Commission urging that this matter move forward expeditiously to final resolution. In support of this contention, DED states as follows:

1. In its opinion, the Missouri Supreme Court instructed the Commission “to determine whether Grain Belt’s proposed utility project is necessary or convenient for the public service” on remand. *Grain Belt Express Clean Line LLC v PSC*, WL 3432778, No. SC 96993 (Mo banc 2018) at 4. The Court did not instruct the Commission to take a specific course of action as to the factual record already established in this proceeding, thus leaving the matter to the Commission’s discretion.

2. As far as the DED’s submitted testimony, DED is willing to stand by the record already litigated in this proceeding with respect to the economic impact of the proposed project and the other testimony regarding the prudential factors that weigh on the *Tartan* factors at issue in this case.¹

¹ DED reserves the right to supplement the record if the Commission opts to re-open the record in this matter.

3. To the extent that the Commission believes that supplementation is required, DED would recommend that the Commission clearly define the issues upon which supplementation is required. In doing so, the Commission should be mindful of the extensive nature of the record already established during the week of the hearings on this issue. Further, the Commission should only allow supplementation to the extent necessary to document any factual changes that have occurred from the end of the 2017 hearing to the present which materially change the record already established.

4. DED has reviewed Grain Belt's proposal for a procedural schedule and believes that the proposal is reasonable. In setting the procedural schedule, the Commission should be guided by the fact that the Missouri Supreme Court recognized the need for expediency in this matter by granting the extraordinary relief of an expedited briefing schedule during the appeal. See *Order Granting Motion to Expedite dated March 2, 2018*.

Respectfully submitted,

/s/ Brian Bear

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Development**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 10th day of October, 2018.

/s/ Brian Bear _____
Brian Bear