

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 ) **File No. EA-2016-0358**  
Current Transmission Line and an Associated Converter )  
Station Providing an Interconnection on the Maywood – )  
Montgomery 345 kV Transmission Line )

**POSITION STATEMENT OF SIERRA CLUB AND NRDC**

Come now Natural Resources Defense Council (NRDC) and Sierra Club, and state their position on the issues.

***1. Does the evidence establish that the Commission may lawfully issue to Grain Belt Express Clean Line LLC ("Grain Belt") the certificate of convenience and necessity ("CCN") it is seeking for the high-voltage direct current transmission line and converter station with an associated AC switching station and other AC interconnecting facilities?***

Yes. The HVDC line and converter station are electric plant for the provision of electrical service to the citizens of Missouri. The grant of a CCN will make Grain Belt Express an electrical corporation subject to Commission regulation as a public utility.

GBE may not "erect" poles without county assents. § 229.100, RSMo. The Commission may grant the CCN on condition those assents are obtained before construction, if the assents are not obtained before decision.

***2. Does the evidence establish that the high-voltage direct current transmission line and converter station for which Grain Belt is seeking a CCN are***

***“necessary or convenient for the public service” within the meaning of that phrase in section 393.170, RSMo.?***

Yes. The Tartan criteria are satisfied. GBE has the financial ability and qualifications, and the project is economically feasible; on these criteria there is no serious opposition. There are economic benefits in the form of lower-cost energy, jobs and tax revenue. It is in the public benefit to provide low-cost renewable energy both to Missouri and to load centers in the PJM Interconnect for the sake of mitigating climate change and reducing pollution from fossil-fired generation.

***3. If the Commission grants the CCN, what conditions, if any, should the Commission impose?***

Staff’s conditions go beyond what is necessary or desirable and seem aimed at killing the project. GBE has indicated what conditions are acceptable to them, and these are reasonable.

***4. If the Commission grants the CCN, should the Commission exempt Grain Belt from complying with the reporting requirements of Commission rules 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D)?***

NRDC and Sierra Club take no position on these variances, as an evidentiary matter, at present.

/s/ Henry B. Robertson  
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Attorney for Sierra Club

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 13th day of March, 2017, to all counsel of record.

/s/ Henry B. Robertson  
Henry B. Robertson