

**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

**MOTION TO INTERVENE of CLEAN GRID ALLIANCE**

Clean Grid Alliance, by counsel, hereby petitions the Public Service Commission of the State of Missouri ("PSC" or "Commission") for an order permitting Clean Grid Alliance to intervene in this proceeding under 20 CSR 4240-2.075 as an interested entity. In support of this Motion to Intervene, Clean Grid Alliance states and alleges the following:

1. Clean Grid Alliance is a not-for-profit corporation organized and existing under the laws of the State of Minnesota. Clean Grid Alliance is a collaborative organization dedicated to renewable energy's fair access to the electric transmission system and market throughout the Midwest. Clean Grid Alliance's Board of Directors and members are comprised of wind, solar, and battery storage developers, environmental organizations, wind and solar energy experts, clean energy advocates, and businesses providing goods and services to the wind industry in Missouri and across the country.
2. Clean Grid Alliance is located at 570 Asbury Street, Suite 201, St. Paul, MN 55104, with a phone number of 651-644-3400. Notice and mailings may be sent or

electronically mailed to:

Sean R. Brady (IL Bar # 6271134)  
Senior Counsel and Regional Policy Manager - East  
Clean Grid Alliance  
P.O. Box 4072  
Wheaton, IL 60189-4072  
Telephone: 312-867-0609  
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and

Judith Anne Willis (MO Bar# 63327)  
The Law Office of Judith Anne Willis  
P.O. Box 106088  
Jefferson City, MO 65110  
Telephone: 573-301-8082  
Email: jaw@anniewillislaw.com

3. This motion is brought within the deadline to seek intervention established in the *Order Directing Notice, Setting Intervention Deadline. Setting Time for Responses, and Directing Filing* issued on September 1, 2022.
4. Clean Grid Alliance and its members will be directly impacted by the decision to approve modifications to the existing Grain Belt certificate of convenience and necessity ("CCN"). CGA's members will be materially harmed because they lose the opportunity to build wind and solar energy facilities in Kansas that would use the Grain Belt line to deliver cost effective renewable energy into Missouri, Illinois, Indiana, and other states served by SPP, MISO and PJM.
5. Clean Grid Alliance supports Grain Belt LLC requests for the Commission to: amend its CCN; take administrative notice of the record in File No. EA-2016-0358; approve limited modifications to conditions in Grain Belt's existing CCN; and that the Commission take any other actions, as necessary under Missouri law, to approve an amended CCN for the project.

6. No other party or entity interested in this proceeding can adequately represent the interests of the Clean Grid Alliance because its interest differs from those of the general public and other intervenors.
7. Clean Grid Alliance was granted intervention and fully participated in two prior cases involving the Grain Belt line: EA-2014-0017 and EA-2016-0305.
8. Clean Grid Alliance 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, Clean Grid Alliance seeks an order granting intervention and the opportunity to provide additional information that will serve the public interest.

Respectfully submitted,

/s/ Judith Anne Willis  
Judith Anne Willis (MO Bar # 63327)

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*Attorney for Clean Grid Alliance*

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on September 29, 2022.

/s/ Judith Anne Willis

*Attorney for Clean Grid Alliance*