

Exhibit No.: 302  
Issue: Need for the Project  
Witness: Jeffrey M. Gray  
Type of Exhibit: Cross-surrebuttal Testimony  
Sponsoring Party: MO Landowners Alliance  
Case No.: EA-2014-0207  
Date Testimony Prepared: Oct. 14, 2014

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. EA-2014-0207**

Cross-surrebuttal Testimony of

**Jeffrey M. Gray, Ph.D.**

On behalf of

**Missouri Landowners Alliance**

October 14, 2014

Exhibit No. 302  
Date 11/13/14 Reporter MG  
File No. EA-2014-0207

1 **Q. Please state your name and business address.**

2 A. My name is Jeffrey M. Gray. My business address is P.O. Box 620323,  
3 Middleton, WI 53562-0323.

4 **Q. Have you previously submitted prepared testimony in this proceeding?**

5 A. Yes, I previously submitted prepared rebuttal testimony dated September 15,  
6 2014, in which I discussed the criteria for a Certificate of Convenience and  
7 Necessity in Missouri, as applied to the proposed Grain Belt Express Clean Line  
8 LLC (“GBE”) transmission project (the “Project”).

9 **Q. What is the subject matter of your cross-surrebuttal testimony?**

10 A. I briefly address aspects of the rebuttal testimony submitted by Michael Goggin  
11 on behalf of Wind on the Wires and the Wind Coalition, regarding certain  
12 regional transmission organization (“RTO”) issues and activities of Midcontinent  
13 Independent System Operator, Inc. (“MISO”), PJM Interconnection, L.L.C.  
14 (“PJM”), and Southwest Power Pool, Inc. (“SPP”).

15 **Q. Please comment on Mr. Goggin’s testimony regarding MISO and SPP  
16 interregional planning and coordination.**

17 A. Mr. Goggin offers a bleak assessment of MISO and SPP interregional planning  
18 and coordination, which I believe is unwarranted and ignores or discounts the  
19 significant progress being made by MISO, SPP, and their stakeholders (Goggin  
20 Rebuttal Testimony at p. 27, lines 707-18). For example, the MISO and SPP  
21 filings of July 1, 2014 in Missouri PSC Docket No. EW-2014-0156 indicate that  
22 MISO and SPP are working diligently on interregional planning and coordination  
23 matters through their Federal Energy Regulatory Commission (“FERC”) Order

1 No. 1000<sup>1</sup> compliance filings, Joint Operating Agreement revisions, and the  
2 Market-to-Market initiative. Some of the details are contentious and subject to  
3 dispute, but that is a normal part of the RTO integration process, and ultimately  
4 will lead to better outcomes for stakeholders as a whole.

5 **Q. How does the Project fit within FERC-jurisdictional interregional planning  
6 and coordination processes?**

7 A. The Project does not fit within those processes. Mr. Goggin seems to suggest that  
8 circumventing those processes is beneficial; and, as support, he describes RTO  
9 integration issues in static terms, as if those issues are not being actively  
10 addressed (Goggin Rebuttal Testimony at pp. 29-31, lines 761-827). To the  
11 contrary, the FERC identified and discussed interregional planning and  
12 coordination issues in Order No. 1000, and the RTOs and their stakeholders have  
13 been actively addressing those issues through their stakeholder processes. The  
14 SPP, MISO, and PJM stakeholder processes are the correct forums for setting  
15 priorities and developing optimal solutions to the complex regional and  
16 interregional issues affecting those RTOs and their stakeholders.

17 **Q. Is shipping wind energy from SPP to PJM an urgent priority for PJM  
18 stakeholders?**

19 A. Not to my knowledge. In my review of PJM stakeholder activities, including the  
20 activities of PJM's Intermittent Resources Task Force, I could find no support for

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<sup>1</sup> *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, FERC Stats. & Regs. ¶ 31,323 (2011), *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 (2012), *order on reh'g and clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012).

1 Mr. Goggin's suggestion that PJM stakeholders are eager to gain access to SPP  
2 wind (*see* Goggin Rebuttal Testimony, p. 28, lines 737-44). For example, in the  
3 March 31, 2014 PJM Renewable Integration Study,<sup>2</sup> the renewable energy  
4 resources examined for meeting or exceeding renewable energy requirements<sup>3</sup> in  
5 the PJM footprint for study year 2026 were (1) onshore wind in the PJM region,  
6 (2) offshore wind along the Atlantic seaboard, (3) centralized solar, and  
7 (4) distributed solar. Although the study is not intended as a forecast, the lack of  
8 any reference to SPP wind suggests a focus on local and regional solutions for  
9 meeting or exceeding renewable energy requirements in the PJM footprint.

10 **Q. Does this conclude your cross-surrebuttal testimony?**

11 **A. Yes, it does.**

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<sup>2</sup> An executive summary is available at <http://pjm.com/~media/committees-groups/task-forces/irtf/postings/pris-executive-summary.ashx> (last visited October 13, 2014). A slide presentation is available at <http://www.pjm.com/~media/committees-groups/task-forces/irtf/postings/pjm-pris-final-project-review.ashx> (last visited October 13, 2014).

<sup>3</sup> Each state in the PJM footprint, except Kentucky and Tennessee, has a renewable portfolio standard, alternative energy portfolio standard, or non-binding renewable portfolio goal.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

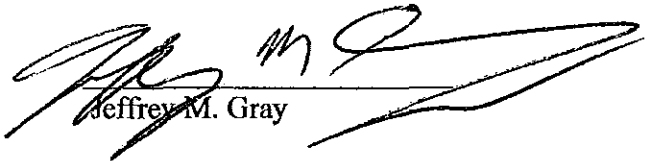
In the Matter of the Application of Grain Belt Express )  
Clean Line LLC for a Certificate of Convenience and )  
Necessity Authorizing it to Construct, Own, Operate, )  
Control, Manage, and Maintain a High Voltage, Direct ) Case No. EA-2014-0207  
Current Transmission Line and an Associated Converter )  
Station Providing an interconnection on the Maywood- )  
Montgomery 345 kV Transmission Line )

AFFIDAVIT OF JEFFREY M. GRAY

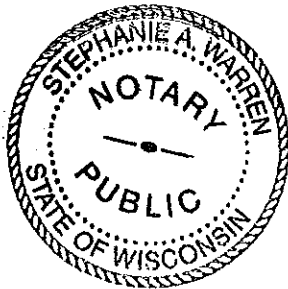
STATE OF WISCONSIN )  
 ) SS  
COUNTY OF DANE )


Jeffrey M. Gray, being first duly sworn on his oath states:

1. My name is Jeffrey M. Gray, Ph.D.
2. Attached hereto and made a part hereof for all purposes is my Cross-surrebuttal Testimony on behalf of Missouri Landowners Alliance consisting of 4 pages, having been prepared in written form for introduction into evidence in the above-captioned docket.
3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

  
Jeffrey M. Gray

Subscribed and sworn before me this 14th day of October, 2014.



  
Notary Public  
My Commission Expires 2/6/2018