BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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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 345 kV Transmission Line

Case No. EA-2016-0358 on REMAND

AFFIDAVIT OF MICHAEL GOGGIN in support of NOTICE REGARDING SUPPLEMENTAL TESTIMONY on behalf of CLEAN GRID ALLIANCE and THE WIND COALITION

I, Michael Goggin, being duly sworn, declare under oath as follows:

1. My name is Michael Goggin. I am the Vice President of Grid Strategies LLC.

2. Attached hereto is the Notice Regarding Supplemental Testimony on behalf of

Clean Grid Alliance and The Wind Coalition, that consists of two (2) pages.

3. I am the same Michael Goggin who testified on behalf of Clean Grid Alliance (f/k/a

Wind on the Wires) and The Wind Coalition in the above cited docket.

4. I have personal knowledge of the facts set forth in the above cited document and they are true and accurate to the best of my knowledge.

5. I reviewed the Rebuttal testimony that I had prepared for the initial hearing in this case and found no, or only *de minimis*, changes have occurred to the facts discussed in that testimony since it was admitted into the record. To the extent facts have changed, in the aggregate

those changes further support the positions stated in my Rebuttal testimony and strengthen the case for the need for the Grain Belt Express line. For example, several states in PJM and MISO have expanded their Renewable Portfolio Standard (RPS) requirements and procurement schedules, further increasing the demand for renewable energy. New Jersey enacted legislation to increase its RPS earlier this year, which will require the delivery of about 4,000 MW of additional renewable capacity to PJM. Following legislation that took effect in 2017, earlier this year the Illinois Commerce Commission approved the long-term renewable procurement plan for its RPS. This will procure 3 million MWh of wind energy by 2030, which will require about 800-900 MW of wind capacity, and the initial purchases have already begun. In addition, MISO has experienced continued generation retirements and is now forecasting more plant retirements than what I stated in my Rebuttal testimony, further increasing the need for the generation that would be delivered via Grain Belt Express.

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Further, affiant sayeth naught.

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Michael Goggin

DC STATE OF COUNTY OF COUNTRY OF

Subscribed and Swom or Affirmed before me

this 16 day of November 2018.

Notary Public

My Commission expires: 3-14-2023



PAUL DALE BEYER NOTARY PUBLIC DISTRICT OF COLUMB. My Commission Expires March 14, 2023