

**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)
Current Transmission Line and an Associated)
Converter Station Providing an Interconnection on the)
Maywood - Montgomery 345kV Transmission Line.)

Case No. EA-2016-0358

**APPLICATION TO INTERVENE OF THE
MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT**

COMES NOW the Missouri Department of Economic Development (“DED”) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Missouri Public Service Commission (“Commission”) grant intervention to DED in the above-styled matter. For its *Application to Intervene*, DED states as follows:

1. On June 30, 2016, Grain Belt Express Clean Line LLC (“Grain Belt Express”) filed an application with the Commission for a Certificate of Convenience and Necessity (“CCN”) to construct, own, operate, control, manage and maintain a high voltage, direct current transmission line and associated facilities within Buchanan, Clinton, Caldwell, Carroll, Chariton, Randolph, Monroe and Ralls Counties, Missouri, as well as an associated converter station in Ralls County.

2. On August 31, 2016, the Commission issued its *Order Directing Notice, Setting Intervention Deadline, And Setting Procedural Conference*, which set an intervention deadline of September 14, 2016.

3. DED is a state agency vested with the powers and duties set forth in § 620.010.1 through § 620.030.1 RSMo., as well as § 640.150 RSMo. through §640.160 RSMo., and § 640.651 RSMo. through § 640.686 RSMo.¹

4. DED has an interest different than that of the general public, and its intervention will serve a public interest in that DED will evaluate the proposed transmission project from a formal state policy and planning perspective, with a specific interest in promoting the economic development of the State.

5. DED supports the approval of the project described in Grain Belt Express's application for a CCN as it will invest an estimated \$500 million in Missouri, will support an estimated 1,500 Missouri jobs during construction, and provide up to 500 megawatts of low-cost, clean power to Missouri.

6. The approval of the project will also provide Missouri's investor-owned utilities a new opportunity to comply with the state's Renewable Energy Standard codified at Section 393.1025 RSMo., with cost-competitive wind energy delivered to Missouri customers.

7. The approval of the project will also help fulfill goals identified in the Comprehensive State Energy Plan. These goals include increasing the security, resiliency, and diversity of the state's energy supply and greater access to clean, renewable energy.

¹ On August 29, 2013, Executive Order 13-03 transferred "all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development"

8. Communications, correspondence, orders, and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov

WHEREFORE, the Missouri Department of Economic Development respectfully requests that the Commission grant DED's *Application to Intervene* in this case.

Respectfully submitted,

/s/ Alexander Antal

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 14th day of September, 2016.

/s/ Alexander Antal
Alexander Antal