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Exhibit No. 18

Grain Belt Express LLC – Exhibit 18
Andrew Burke
Surrebuttal Testimony
File No. EA-2023-0017

Exhibit No.:
Issue(s): Route Selection
Witness: Andrew Burke
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Grain Belt Express LLC
File No.: EA-2023-0017
Date Testimony Prepared: May 15, 2023

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO.

EA-2023-0017

SURREBUTTAL TESTIMONY

OF

ANDREW BURKE

ON

BEHALF OF

GRAIN BELT EXPRESS LLC

MAY 15, 2023

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1 **I. INTRODUCTION**

2 **Q. Please state your name, present position and business address.**

3 A. My name is Andrew Burke. I am the Senior Planner/GIS Specialist for WSP USA,
4 Inc. (“WSP”). My business address is 10 Al Paul Lane, Suite 103, Merrimack, New Hampshire
5 03054.

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

7 A. Yes, I submitted direct testimony on August 24, 2022 and accompanying
8 exhibits/schedules identified as Schedules AB-1 through AB-5.

9 **Q. What is the purpose of your surrebuttal testimony?**

10 A. I am responding to testimony filed by Staff Witness Cedric Cunigan, PE and several
11 public comments relating to route selection.

12 **II. RESPONSE TO STAFF WITNESS CEDRIC CUNIGAN**

13 **Q. Have you had an opportunity to review Staff Witness Cedric Cunigan’s**
14 **comments regarding route selection in his Rebuttal Testimony?**

15 A. Yes, I have.

16 **Q. Does Staff list questions related to the route selection process at issue in this**
17 **case?**

18 A. Yes, Mr. Cunigan lists several questions relating to weighting given to different
19 guidelines in the Routing Study included in Schedule AB-2 to my Direct Testimony.¹ Mr. Cunigan
20 also requests more details regarding how public comments were used to develop the route and the
21 estimated costs of certain considered alternative routes.

22 **Q. How do you respond to Mr. Cunigan’s questions?**

¹ See Rebuttal Testimony of Cedric Cunigan, PE, at p. 3, ll. 1-17.

1 A. The factors that were used to develop potential routes, refined potential route
2 network, and alternative routes are discussed in detail in Schedule AB-2. In particular, please refer
3 to sections 2.3 Routing Guidelines and 4.2 Routing Constraints and Opportunities. These factors
4 are not ranked or weighted. Section 4.4.2 Revisions to the Potential Route Network contains a
5 detailed discussion of how public comments directly resulted in adjustments to the routes.

6 **III. RESPONSE TO PUBLIC COMMENTS**

7 **Q. Are there any public comments you wish to address?**

8 A. Yes, I am addressing public comments relating to general routing considerations.

9 **Q. A few commenters question why more highway rights-of-way were not used.
10 How do you respond?**

11 A. To the extent possible, existing highway rights-of way and other existing
12 infrastructure were used. For more information on the use of existing infrastructure to develop the
13 Tiger Connector's route, reference Section 4 of the Route Selection Study, which is Schedule AB-
14 2 of my direct testimony.

15 **Q. Relatedly, commenters asked why routing does not follow property lines and
16 instead runs diagonally over farmland. How do you respond?**

17 A. Diagonal routing can provide a number of routing benefits. Generally, routing
18 diagonally reduced the overall length of the line, meaning less poles and obstructions to land.
19 Routing along property lines can lead to other problems, including increasing proximity to homes,
20 leading to construction in wetlands or natural habitats, or causing road obstructions.

21 Nevertheless, to the extent possible and practicable, the Routing Team aligned routes along
22 parcel boundaries. For more information on the use of parcel boundaries and section lines to

1 develop the Tiger Connector's route, reference Section 4 of the Route Selection Study, which is
2 Schedule AB-2 of my direct testimony.

3 **IV. CONCLUSION**

4 **Q. Does this conclude your testimony?**

5 **A. Yes, it does.**

**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) File No. EA-2023-0017
Maintain a High Voltage, Direct Current)
Transmission Line and Associated Converter)
Station)

AFFIDAVIT OF ANDREW BURKE

1. My name is Andrew Burke. I am the Senior Planner/GIS Specialist for WSP USA, Inc. (“WSP”). My business address is 10 Al Paul Lane, Suite 103, Merrimack, NH 03054.

2. I have read the above and foregoing Rebuttal Testimony and the statements contained therein are true and correct to the best of my information, knowledge, and belief.

3. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.



Andrew Burke
[Senior Planner/GIS Specialist]
WSP USA, Inc.

Date: ___5/12/23_____