

**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 )

**IBEW UNIONS' FINDING OF FACTS AND CONCLUSIONS OF LAW**

COME NOW, IBEW Local Union 2, IBEW Local Union 53 and IBEW Local Union 1439 (collectively, the "IBEW Unions"), through counsel, and file their Findings of Facts and Conclusions of Law.

The IBEW Unions participated in this matter on a limited basis and therefore will not deign to present proposed findings of facts and conclusions of law pertaining to the full panoply of issues.

I. Findings of Facts

1. The IBEW Unions are labor organizations that represent a wide range of electrical workers including but not limited to specialists in construction of transmission and distribution systems, persons who test, maintain and repair underground and overhead systems, specialists in substations, and tree trimmers. IBEW Locals 2, 53 and 1439 each represent persons employed in the [electrical industry in Missouri](#).
2. IBEW Local 2 represents specialists in construction of transmission and distribution systems. Local 2 Business Manager David Desmond worked in the field for approximately 2 decades and has worked another 2 decades as a full-time representative of electrical workers. He brings to this proceeding a wealth of practical knowledge about the current and future energy needs in Missouri and the impediments to meeting those

needs.

3. The proposed Grain Belt Express project involves the installation of approximately 206 miles of high-voltage direct current transmission line and a substation in Missouri. The project should employ approximately 1000 people overall, including highly-paid electrical workers, steel workers, and operating engineers. These jobs should primarily employ residents of Missouri. Missouri general contractors already have collective bargaining agreements in place with the various trades that will be implicated, including with the IBEW. Approximately 250 of these would be construction electrical workers whose pre-negotiated package rate across Missouri is \$39/hour.
4. The Grain Belt Express project construction phase is anticipated to last approximately 2.5 years.
5. Construction workers are not permanent employees of a particular employer, but move from one construction project to the next. They need new construction to remain employed, and the longer the project the better. A construction project that lasts 2.5 years is significant.
6. The Grain Belt Express project is also slated to employ 70 permanent operation and maintenance employees to run the Ralls County converter station. Those employees would earn more than \$25/hour and benefits, subject to negotiation.
7. Job losses are occurring in the electrical industry, in Missouri and across the nation, in response to the regulatory push for green energy across the nation.
8. The reduction of coal-powered generation of electricity due to federal and Missouri regulation in favor of green energy creates a need for low-environmental impact, low-cost wind-powered electricity, such as will be provided by the Grain Belt Express.

Projects like this one are also necessary to replace job losses from the closings of coal-generated power plants.

9. In the instant case, the Grain Belt Express project will likely contribute a relatively small percentage of the electricity used in Missouri, as its production is largely committed to other Midwest markets (Illinois and Indiana). This restricted production for Missouri usage makes it highly unlikely the Grain Belt Express would result in the closing of any existing source of electrical generation in Missouri.
10. Nevertheless, the small percentage of electricity available in Missouri as a result of the Grain Belt Express project will be a significant incremental and diversifying addition to the green energy sources available in Missouri. Based on existing regulations and forecasted trends, Missouri and the nation will be requiring an ever increasing percentage of their electrical needs to be met by green energy sources.
11. The current electrical grid in Missouri will not support such clean energy without upgrading. The HVDC line proposed by Grain Belt as part of this project will interconnect with the Ameren line, providing a small part of the upgrading that will be necessary to accomplish the federal and Missouri goal of transmitting electricity more cleanly.
12. The proposed Grain Belt Express project is a private investment in green energy. Failure to obtain private investment in Missouri's green energy development is likely to result in the overburdening of State resources to fill the void.

## II. Conclusions of Law

1. Based on existing regulations and forecasted trends, Missouri and the nation will be

requiring an ever increasing percentage of their electrical needs to be met by green energy sources.

2. It takes substantial time to plan and construct the infrastructure and generating capabilities for new green energy sources. The only way to timely meet increasing green energy goals is to get ahead of them now by putting in place the infrastructure and generating capabilities before they are mandated.
3. The Commission will grant Grain Belt Express a Certificate of Convenience and Necessity because the building, operation and maintenance of the project described in this matter is necessary or convenient for public service.
4. Green energy development is currently hampered in Missouri by the inadequacy of the electrical grid. The Grain Belt Express project will upgrade a section of Missouri's electrical grid, which connects with the existing grid. In so doing, it is likely to encourage future green energy development.
5. The Grain Belt Express project will be a significant addition to the development in Missouri of the green energy infrastructure and generating capabilities using largely private dollars.
6. From a jobs standpoint, this is an important first step in maintaining good employment of highly trained Missouri residents in the areas of electrical construction, operation and maintenance.
7. For the Missouri section of the project, Grain Belt Express is required to first attempt to hire all construction, operation and maintenance employees from Missouri and, overall, to employ a majority of construction, operation and maintenance workers from

Missouri.<sup>1</sup>

Respectfully submitted,

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**Certificate of Service**

I certify that a true and correct copy of the foregoing document was served the parties to this case by email or U.S. Mail, postage prepaid, this December 22, 2014.

/s/ Sherrie Hall

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<sup>1</sup> This is a slight modification of the IBEW Unions' prior request to reflect practical considerations. Specifically, it recognizes that timing may dictate the availability of a sufficient number of electrical construction employees who are Missouri residents. In the event there is not a sufficient number available, Grain Belt Express would need to supplement the Missouri-based workforce with workers from outside the State.