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Grain Belt Express LLC – Exhibit 15
Jennifer Stelzleni
Direct Testimony
File No. EA-2023-0017

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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO.

EA-2023-0017

DIRECT TESTIMONY

OF

JENNIFER STELZLENI

ON

BEHALF OF

GRAIN BELT EXPRESS LLC

AUGUST 24, 2022

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1 **I. INTRODUCTION**

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

3 A. My name is Jennifer Stelzleni. I am a Senior Manager for Environmental
4 Compliance and Strategy for Invenergy LLC. My business address is One South Wacker Drive,
5 Suite 1800, Chicago, Illinois 60606.

6 **Q. Please describe your education and professional background.**

7 A. I have a Bachelor of Science in Biology from Missouri State University and a
8 Master of Science, also in Biology, from St. Louis University. I began my career with URS
9 Corporation (“URS”), in St. Louis, Missouri. URS was an engineering, design and construction
10 firm which was later acquired by AECOM, which is a multinational engineering firm. At URS,
11 my first role was as a “Biologist,” where I focused on soil, sediment, groundwater and surface
12 water investigations, environmental due diligence and ecological risk assessment. From there, I
13 was promoted to “Project Manager,” where I was responsible for directing and managing flora and
14 fauna, wetland, stream and other habitat assessments.

15 I continued in the same role through URS’s acquisition by AECOM. Eventually I was
16 promoted to a “Team Leader for Planning and Permitting” at AECOM. As a Team Leader for
17 Planning and Permitting, I led AECOM’s Planning and Permitting practice in St. Louis to execute
18 projects requiring environmental surveys and engineering, prepared permit applications, and
19 coordinated with regulatory agencies and stakeholders. The projects I executed included solar and
20 wind development projects, pipelines, transmission and distribution, oil refining, steel
21 manufacturing, railroad and mining. After six years as a Team Leader with AECOM, I moved to
22 Invenergy, where I currently work.

23 My curriculum vitae is attached as Schedule JS-1.

1 **Q. What are your duties and responsibilities in your present position?**

2 A. Grain Belt Express LLC (“Grain Belt Express”), the Petitioner in this proceeding,
3 is a limited liability company organized under the laws of the State of Indiana. Grain Belt Express
4 is a wholly-owned subsidiary of Invenergy Transmission LLC (“Invenergy Transmission”), a
5 Delaware limited liability company, which is a wholly-owned subsidiary of Invenergy Renewables
6 LLC (“Invenergy Renewables”), also a Delaware limited liability company. Invenergy
7 Transmission LLC and its affiliate, Invenergy LLC, are global leaders in renewable energy and
8 transmission development. Invenergy or its affiliates are providing project management support
9 for Grain Belt Express, including overseeing financing, design, engineering, construction and
10 permitting of the Grain Belt Express transmission line project (“Project”) pursuant to agreements
11 with Grain Belt Express.

12 In my current role, among other things, I manage the environmental permitting and
13 regulatory compliance for projects in development by Invenergy LLC and its affiliates. In that
14 role, I am overseeing Grain Belt Express’ compliance with all applicable environmental
15 regulations and permitting for the Project.

16 **Q. Have you previously provided testimony before the Missouri Public Service**
17 **Commission or other regulatory Commissions?**

18 A. I have not provided testimony before the MPSC. I have submitted testimony before
19 the Illinois Commerce Commission supporting an application for an Illinois Certificate of Public
20 Convenience and Necessity for this Project.¹

¹ See Grain Belt Express Exhibits 6.0 – 6.2: Direct Testimony and Exhibits of Jennifer Stelzleni, ICC Dkt. No. 22-0499.

1 **Q. What is the purpose of your direct testimony?**

2 I am testifying on behalf of Grain Belt Express, which is requesting that the Missouri Public
3 Service Commission (“Commission”) amend its existing certificate of public convenience and
4 necessity (“CCN”) to construct, install, own, operate, maintain, and otherwise control and manage
5 an approximately 800-mile, overhead, multi-terminal +/-600 kilovolt (“kV”) high-voltage, direct
6 current (“HVDC”) transmission line and associated facilities including converter stations and
7 alternating current (“AC”) connector lines (the “Project”). The AC connector line in Missouri is
8 proposed to traverse approximately 40 miles through Monroe, Audrain and Callaway Counties and
9 is referred to as the “Tiger Connector.” Specifically, I will describe Grain Belt Express’ substantial
10 efforts to comply with all appropriate environmental regulations and permitting requirements in
11 an effort to mitigate any adverse environmental impact arising from the construction and operation
12 of the Tiger Connector.

13 **Q. Are you sponsoring any schedules or exhibits as part of your direct testimony?**

14 A. Yes, I am sponsoring the following exhibits/schedules:

- 15 • Schedule JS-1 – My curriculum vitae

16 **II. GRAIN BELT EXPRESS’ PLAN FOR REGULATORY COMPLIANCE**

17 **Q. Is Grain Belt Express capable of complying with all environmental regulations**
18 **imposed by state and federal agencies?**

19 A. Yes. Grain Belt Express is capable of complying with all applicable environmental
20 regulations. Grain Belt Express has already begun communications with applicable environmental
21 regulatory agencies that oversee the land, air, waterways and archaeological resources potentially

1 impacted by the Proposed Route for the Tiger Connector (“Proposed Route”).² Those
2 communications include those made to: (a) advise the agencies of routes under consideration to
3 discuss regulations and possible environmental concerns well before construction; (b) discern all
4 existing or future agency owned or managed lands, conservation projects or easements, wetland
5 or waterbody concerns; and (c) avoid and minimize negative impacts to those areas and concerns
6 caused by routes under consideration.

7 The Project’s compliance with all environmental regulations and environmental agency
8 concerns is further support for Grain Belt Express’ contention in the Application that it has the
9 necessary technical and managerial capabilities to construct and operate the Project, including the
10 Tiger Connector.

11 **Q. Does Grain Belt Express have experienced environmental permitting**
12 **specialists in-house?**

13 A. Yes, through its affiliates, Grain Belt Express has a team of experienced in-house
14 environmental specialists that are capable of assisting with environmental regulatory compliance.
15 Further, Grain Belt Express has engaged a routing consultant, WSP USA, Inc. (“WSP”), that has
16 assisted Grain Belt Express to design a route that addresses environmental regulatory concerns and
17 minimizes impacts to environmentally sensitive areas. Grain Belt Express has also engaged
18 environmental consultants to support the environmental permitting and compliance efforts of the
19 Project. Grain Belt Express’ environmental team will work in tandem with its construction team
20 to address compliance issues and ensure compliance with all regulatory requirements prior to and
21 during the construction portion of the Project.

² The Proposed Route is described in the Direct Testimony of Andrew Burke and Schedule AB-2.

1 Grain Belt Express has engaged the following consultants who are currently providing
2 environmental services on the Phase I portion of the Project:

- 3 • SWCA Environmental Consultants (supporting Endangered Species Act (“ESA”)
4 compliance, wildlife studies and permitting, National Historic Preservation Act
5 (“NHPA”) compliance, file management);
- 6 • Hanson Professional Services, Inc. (supporting wetlands and waters studies and
7 permitting);
- 8 • Environmental Solutions & Innovations, Inc. (conducting bat species studies); and
- 9 • Environmental Science Associates (providing National Environmental Policy Act
10 (“NEPA”) strategy support and NHPA strategy support).

11 **Q. Does Grain Belt Express have experience assisting large infrastructure**
12 **projects to comply with environmental agency regulations?**

13 A. Yes. Invenergy Transmission has developed over 4,000 miles of transmission and
14 collection lines, 88 substations, 96 generator, step-up transformers and over 5,000 pad mount
15 transformers over the past 20 years. This is in addition to over 191 large-scale clean power projects
16 in the United States and globally, totaling 30 gigawatts and representing \$47 billion in completed
17 transactions. Through these relationships, Invenergy Transmission has access to significant
18 amounts of expertise to assist with regulatory compliance. This expertise is both in-house and
19 through established relationships with respected consulting firms. For instance, Grain Belt
20 Express has been engaged with several agencies with jurisdiction in Kansas and Missouri at the
21 state and federal levels to ensure environmental resources are fully understood and to outline the
22 appropriate environmental compliance strategy for the Project. This collaborative effort aims to
23 avoid and minimize environmental impacts to Kansas and Missouri.

1 **Q. Regarding the current certificated route, what progress has Grain Belt**
2 **Express made regarding environmental compliance and consulting?**

3 A. Invenergy Transmission and Grain Belt Express have contracted with transmission
4 line engineering and environmental permitting firms to advance the design of the Project
5 transmission line, secure environmental permits required by federal and state agencies to construct
6 the Project, and act as an overall project manager to coordinate between Project disciplines.

7 Our engineering team is steadily progressing with efforts focused on supporting
8 environmental permitting, crossing agreements, and land acquisition. Approximately 550 miles of
9 transmission line structures have been designed incorporating details such as LiDAR survey, high
10 definition ortho-imagery, and high-performance conductors. Structure locations have been
11 evaluated and modified as needed to limit disturbance to sensitive habitat, other environmental
12 features, and landowner requests.

13 Ortho-imagery obtained in 2020, together with desktop assessments and field surveys
14 conducted in 2021, have been used to identify sensitive environmental features. Engineering has
15 utilized information provided from ortho-imagery and environmental assessments to preemptively
16 avoid and minimize disturbance to the areas identified. Additional, targeted environmental field
17 surveys are to be performed in 2022, 2023, and 2024. Surveys will be used to further refine and
18 reduce overall environmental impacts. Grain Belt Express is in discussions with relevant
19 permitting agencies (US Army Corps of Engineers, US Fish and Wildlife Service, *et al.*) to
20 discuss/confirm the Project's survey approach and permitting and compliance approach.

21 Utilizing LiDAR topographic and aerial obstruction survey engineering has refined design
22 for more than 500 crossings in Missouri, including overhead electrical transmission and

1 distribution lines, railroads, highways, county roads, major water bodies, rivers, levees, and
2 protected species habitats.

3 **Q. Would Grain Belt Express use these same tools and strategies with regard to**
4 **the Project, as amended in this amendment filing?**

5 A. Yes, Grain Belt Express would use the same tools and strategies in the amended
6 Project as it uses them in the Project as currently certificated. The amendments would have no
7 material change to how Grain Belt Express conducts its environmental assessments and strategies
8 relating to this Project.

9 **Q. Which agencies, and with whom at those agencies, has Grain Belt Express**
10 **already communicated regarding the Proposed Route for the Tiger Connector portion of the**
11 **Project?**

12 A. In preparation for this amendment filing, I have called contacts at the United States
13 Army Corps of Engineers Kansas City District, United States Fish and Wildlife Ecological
14 Services Field Office in Missouri, Missouri Department of Conservation, and National Park
15 Service to provide a Project update and make the agencies aware of the planned filing.

16 It is my understanding that WSP also contacted regulatory agencies as a part of the Route
17 Selection Study for the Tiger Connector and to request information on agency owned or managed
18 resources, and that agencies, including those with jurisdiction over environmental aspects of the
19 Tiger Connector area, had the opportunity to provide feedback on the Tiger Connector. This is
20 discussed in greater detail in the Route Selection Study provided as Schedule AB-2, attached to
21 the Direct Testimony of Andrew Burke.

1 **Q. How does Grain Belt Express intend to comply with applicable environmental**
2 **regulations going forward?**

3 A. Grain Belt Express has developed a Proposed Route, which it is presenting to the
4 Commission in its Application. That route selection process is described in detail in the Direct
5 Testimony of Andrew Burke and the Route Selection Study attached thereto as Schedule AB-2.
6 Grain Belt Express is continuing to follow up on the communications with the above-referenced
7 agencies to update the agencies with information regarding the Proposed Route. Grain Belt
8 Express, through WSP, requested feedback from these agencies on the Proposed Route, including
9 any perceived or potential environmental impacts. Since that time, we have continued to provide
10 agencies with project updates and to coordinate with those agencies. The intent of these
11 communications is to understand any negative effects the Proposed and other considered routes
12 may have on existing and future environmental concerns and to determine that the approved route
13 is compliant with all existing applicable regulations before commencing construction.

14 Each of the above-listed agencies was provided the opportunity to provide input on agency-
15 owned and/or agency-managed resources in the vicinity of the Tiger Connector. I notified our
16 routing consultant, WSP, in advance of and following my correspondence with the regulatory
17 agencies. In my most recent correspondence with agency representatives, they did not provide
18 additional feedback regarding the environmental resources about which we are already conferring
19 for the Project. The Tiger Connector routing has accounted for all known environmental resources
20 and information received from the agencies has not necessitated a reroute. Each agency has also
21 appointed a representative to serve as a point person for the Phase I of the Project to facilitate
22 future coordination with applicable environmental permitting and compliance. These
23 representatives will serve as the point persons for the Tiger Connector portion as well.

1 **Q. Has Grain Belt Express engaged in any other efforts to gain environmental**
2 **regulatory compliance?**

3 A. Yes, Grain Belt Express has voluntarily reached out to 21 Native American Tribes
4 in Kansas and Missouri to obtain information about areas of interest to those entities. Grain Belt
5 Express also intends to reach out to Native American Tribes regarding the Proposed Route for the
6 Tiger Connector.

7 **III. GRAIN BELT EXPRESS MEETS THE *TARTAN* FACTORS FOR ISSUING A**
8 **CCN**

9 **Q. Are you familiar with the Commission’s factors for granting a CCN, referred**
10 **to as the “*Tartan* Factors”?**

11 A. While I am not an attorney, it is my understanding that in its review of CCN
12 applications, the Commission has traditionally applied several criteria, which it refers to as the
13 “*Tartan* Factors.” Other Grain Belt Express witnesses address several of the *Tartan* Factors in
14 their testimonies. In this testimony, I provide support for the second and fifth *Tartan* factors,
15 which require that the applicant must be qualified to provide the proposed service and that the
16 service be in the public interest.

17 **Q. In your view, does Grain Belt Express meet these factors?**

18 A. Yes, as detailed above, Grain Belt Express has a dedicated team of environmental
19 experts who will supervise the environmental compliance associated with the planning,
20 construction, and operation of the Tiger Connector—and the rest of the Project. This demonstrates
21 that Grain Belt Express is qualified to build and operate the Tiger Connector and the rest of the
22 Project. It also demonstrates that the Grain Belt Express will promote the public interests of
23 providing affordable, reliable energy and respecting, reinforcing, and protecting the surrounding
24 habitats and environment.

1

IV. CONCLUSION

2

Q. Does this conclude your testimony?

3

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 JENNIFER STELZLENI

1. My name is Jennifer Stelzleni. I am a Senior Manager for Environmental Compliance and Strategy for Invenergy LLC. My business address is One South Wacker Drive, Suite 1800, Chicago, Illinois 60606.

2. I have read the above and foregoing Direct 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.

**Jennifer
Stelzleni**

Digitally signed by: Jennifer Stelzleni
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Jennifer Stelzleni
Senior Manager for Environmental Compliance and Strategy
Invenergy LLC

Date: August 22, 2022