

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Grain Belt Express)
Clean Line LLC for Approval of its Acquisition by) No. EM-2019-0150
Invenergy Transmission LLC)

First Set of General Data Requests for Grain
Belt Express From Show Me Concerned Landowners

Definitions

For purposes of these data requests, the words and acronyms used herein have the following meanings:

“GBE” means Grain Belt Express Clean Line LLC

“GBE Holding” means Grain Belt Express Holding LLC

“Clean Line” means Clean Line Energy Partners LLC

Data Requests

G1 Please list the years in which GBE, GBE Holding or Clean Line filed an annual report with the Commission pursuant to Section 393.140(6) RSMo and 4 CSR 240-10.145.

G2 Please provide a copy of the most recent annual report referenced in the preceding item which was filed by GBE, GBE Holding or Clean Line.

G3 Please list the years in which GBE, GBE Holding or Clean Line published the rate schedules referenced in 4 CSR 240-3.145(2).

G4 Please provide a copy of the most recent rate schedule referenced in the preceding item which was published by GBE, GBE Holding or Clean Line.

G5 Please list the years in which GBE, GBE Holding or Clean Line filed a tariff with the Commission pursuant to the second sentence of 4 CSR 240-14.030(3) regarding the rates offered to MJMEUC and/or Realgy, as promotional practices under 4 CSR 240-3.100(13) and/or 4 CSR 240-14.02(1)(J).

G6 Please provide a copy of the most recent tariff filing referenced in the preceding item which was filed by GBE, GBE Holding or Clean Line.

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G7 Please list the years in which GBE, GBE Holding or Clean Line filed a tariff pursuant to the terms of 4 CSR 240-3.150(2).

G8 Please provide a copy of the most recent tariff filing referenced in the preceding item which was filed by GBE, GBE Holding or Clean Line.

G9 Please list the years in which GBE, GBE Holding or Clean Line submitted the information specified in 4 CSR 240-3.175(1).

G10 Please provide a copy of the most recent submission referenced in the preceding item which was submitted by GBE, GBE Holding or Clean Line.

G11 Please list the months in which GBE, GBE Holding or Clean Line submitted a report of the type referenced 4 CSR 240-3.190(1).

G12 Please provide a copy of the most recent report submitted, as referenced in the preceding item, which was submitted by GBE, GBE Holding or Clean Line.

G13 Please state the address at which the general records of GBE, GBE Holding and Clean Line are now maintained, and the date on which those records were first maintained at that location.

G14 Please list the dates on which GBE, GBE Holding or Clean Line provided a notification to the Commission of the type referenced in 4 CSR 240-10.010(3)(B) or (C).

G15 Please provide a copy of the most recent notification to the Commission, as referenced in the preceding item, submitted by GBE, GBE Holding or Clean Line.

G16 Please provide a copy of the most recent document compiled by GBE, GBE Holding or Clean Line in conformance with the provisions of 4 CSR 240-20.030 relating to the Uniform System of accounts for electrical corporations.

G17 Please list the years in which GBE, GBE Holding or Clean Line filed an annual RES Compliance Report and/or a RES Compliance Plan as referenced in 4 CSR 240-20.100(8).

G18 Please provide a copy of the most recent Report and the most recent Plan as referenced in the preceding item which were filed by GBE, GBE Holding or Clean Line.

G19 Please list the years in which GBE, GBE Holding or Clean Line compiled the document referred to in 4 CSR 240-22.040(2) .

G20 Please provide a copy of the most recent document referenced in the preceding item which was compiled by GBE, GBE Holding or Clean Line.

G21 Please list the years in which GBE, GBE Holding or Clean Line compiled the document referred to in 4 CSR 240-22.050(2).

G22 Please provide a copy of the most recent document referenced in the preceding item which was compiled by GBE, GBE Holding or Clean Line.

G23 Please provide the names of all "vegetation managers" employed by GBE, GBE Holding or Clean Line, as referenced in 4 CSR 240-23.030(2)(D), and the beginning and ending dates that each such employee was employed in that capacity.

G24 Please list the years in which GBE, GBE Holding or Clean Line filed the triennial compliance filing referenced in 4 CSR 240-22.080(1) and (14), or in lieu thereof, the years in which any of those entities applied for a waiver under subsection (14).

G25 Please provide a copy of the most recent compliance filing or application for a waiver as referenced in the preceding item which was submitted by GBE, GBE Holding or Clean Line.

G26 Please list the years in which GBE, GBE Holding or Clean Line developed the alternative resource plan referenced at 4 CSR 240.22.060(1).

G27 Please provide a copy of the most recent plan referenced in the preceding item which was developed by GBE, GBE Holding or Clean Line.

G28 If GBE, GBE Holding or Clean Line received a waiver, variance or exemption from the Commission for any of the filings or other matters referenced in G1 to G27, please provide copies of all such waivers, variances and exemptions.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served upon the parties to this case by electronic mail this 28th day of February, 2019.

/s/ Paul A. Agathen

Paul A. Agathen

Attorney for Show Me Concerned Landowners

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Joint Application of Invenergy)
Transmission LLC, Invenergy Investment Company LLC,)
Grain Belt Express Clean Line LLC, and Grain Belt Express) Case No. EM-2019-0150
Holding LLC for an Order Approving the Acquisition by)
Invenergy Transmission LLC of Grain Belt Express Clean)
Line LLC)

**GRAIN BELT EXPRESS CLEAN LINE LLC'S
RESPONSES TO SHOW ME CONCERNED LANDOWNERS'
FIRST SET OF GENERAL DATA REQUESTS**

For its responses to Show Me Concerned Landowners' First Set of General Data Requests, Nos. G1 - G28, Grain Belt Express Clean Line LLC ("Company" or "Grain Belt Express") states the following:

G1: Please list the years in which GBE, GBE Holding or Clean Line filed an annual report with the Commission pursuant to Section 393.140(6) RSMo and 4 CSR 240-10.145.

RESPONSE: Subject to all objections, the Company states that it has not yet received a line Certificate of Convenience and Necessity ("CCN") under Section 393.170.1 from the Missouri Public Service Commission ("Commission") permitting it to begin construction of electric plant. It has not requested an area CCN under Section 393.170.2 to serve the public. Further, in its CCN Application currently pending before the Commission in No. EA-2016-0358 ("CCN Application"), the Company has sought a waiver of the annual reporting requirement of 4 CSR 240-3.165, now found at 10.145, as well as other regulations, including 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D), pursuant to 4 CSR 240-2.060(4)(B). The Company has agreed to file with the Commission the annual report that it files with the Federal Energy Regulatory Commission ("FERC") after it begins operations. Given that the referenced statute and rule do not apply to the Company, it has not made such a filing.

Grain Belt Express Holding LLC ("GBE Holding") and Clean Line Energy Partners LLC ("Clean Line") are not subject to the requirements of the referenced statute or rule.

G2: Please provide a copy of the most recent annual report referenced in the preceding item which was filed by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the Response to G1.

G3: Please list the years in which GBE, GBE Holding or Clean Line published the rate schedules referenced in 4 CSR 240-3.145(2).

RESPONSE: Subject to all objections, the Company states that at this time it is not “engaged in the ... transmission of electricity” under this regulation and, therefore, is not subject to it. Once the Company begins operations, it will not offer retail service in Missouri and will be regulated as an interstate, transmission-only company by FERC under the Federal Power Act. See Response to G1. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G4: Please provide a copy of the most recent rate schedule referenced in the preceding item which was published by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G3.

G5: Please list the years in which GBE, GBE Holding or Clean Line filed a tariff with the Commission pursuant to the second sentence of 4 CSR 240-14.030(3) regarding the rates offered to MJMEUC and/or Realgy, as promotional practices under 4 CSR 240-3.100(13) and/or 4 CSR 240-14.02(1)(J).

RESPONSE: Subject to all objections, the Company states that it is not subject to these regulations. Once the Company begins operations, it will not offer retail service in Missouri and will be regulated as an interstate, transmission-only company by FERC under the Federal Power Act. See Response to G1. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G6: Please provide a copy of the most recent tariff filing referenced in the preceding item which was filed by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G5.

G7: Please list the years in which GBE, GBE Holding or Clean Line filed a tariff pursuant to the terms of 4 CSR 240-3.150(2).

RESPONSE: Subject to all objections, the Company states that it is not subject to 4 CSR 240.3-150 (regarding the filing requirements for electric utility promotional practices). Once the Company begins operations, it will not offer retail service in Missouri and will be regulated as an interstate, transmission-only company by FERC under the Federal Power Act. See Response to G1. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G8: Please provide a copy of the most recent tariff filing referenced in the preceding item which was filed by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G7.

G9: Please list the years in which GBE, GBE Holding or Clean Line submitted the information specified in 4 CSR 240-3.175(1).

RESPONSE: Subject to all objections, the Company states that it is not subject to 4 CSR 240-3.175 (regarding depreciation studies). Once the Company begins operations, it will not offer retail service in Missouri and will be regulated as an interstate, transmission-only company by FERC under the Federal Power Act. Further, in its CCN Application currently pending before the Commission, the Company has sought a waiver of the reporting requirements of 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D), pursuant to 4 CSR 240-2.060(4)(B). See Response to G1. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G10: Please provide a copy of the most recent submission referenced in the preceding item which was submitted by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G9.

G11: Please list the months in which GBE, GBE Holding or Clean Line submitted a report of the type referenced 4 CSR 240-3.190(1).

RESPONSE: Subject to all objections, the Company states that it has not operated and does not operate generating units or other power production facilities that 4 CSR 240-3.190 relates to, and it is not subject to this regulation. Once the Company begins operations, it will not offer retail service in Missouri and will be regulated as an interstate, transmission-only company by the FERC under the Federal Power Act. Further, in its CCN Application currently pending before the Commission, the Company has sought a waiver of the reporting requirements of 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D), pursuant to 4 CSR 240-2.060(4)(B). See Response to G1. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G12: Please provide a copy of the most recent report submitted, as referenced in the preceding item, which was submitted by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G11.

G13: Please state the address at which the general records of GBE, GBE Holding and Clean Line are now maintained, and the date on which those records were first maintained at that location.

RESPONSE: Subject to all objections, the Company states that the records of GBE have always been maintained at its offices located at 1001 McKinney Street, Suite 700, Houston, Texas. Its CCN Application stated that it planned to maintain its books and records regarding the Grain Belt Express Project and the Missouri Facilities at those offices, and not in Missouri. The Company further advised that it will make such records available to the Commission upon reasonable notice at its offices in Texas and will additionally produce copies of those portions of its books and records requested by the Commission in Missouri upon reasonable notice and subject to applicable confidentiality provisions. The Company has sought a waiver of the requirements of 4 CSR 240-10.010(3), as well as the reporting requirements of 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D), pursuant to 4 CSR 240-2.060(4)(B) in Paragraph 77-78 of its CCN Application. Given that the referenced rule does not apply to the Company at this time, it has not made records otherwise available.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G14: Please list the dates on which GBE, GBE Holding or Clean Line provided a notification to the Commission of the type referenced in 4 CSR 240-10.010(3)(B) or (C).

RESPONSE: Subject to all objections, see the response to G13.

G15: Please provide a copy of the most recent notification to the Commission, as referenced in the preceding item, submitted by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G13.

G16: Please provide a copy of the most recent document compiled by GBE, GBE Holding or Clean Line in conformance with the provisions of 4 CSR 240-20.030 relating to the Uniform System of accounts for electrical corporations.

RESPONSE: Subject to all objections, the Company states that it has not yet received a line CCN under Section 393.170.1 from the Commission permitting it to begin construction of electric plant. It has not requested an area CCN under Section 393.170.2 to serve the public. Further, in its CCN Application currently pending before the Commission, the Company has sought a waiver of the annual reporting requirement of 4 CSR 240-3.165, now found at 10.145, as well as other regulations, including 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D), pursuant to 4 CSR 240-2.060(4)(B). The Company has agreed to file with the Commission the annual report that it files with FERC after it begins operations which will meet the requirements of the Uniform System of Accounts found at 18 C.F.R. Part 101. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G17: Please list the years in which GBE, GBE Holding or Clean Line filed an annual RES Compliance Report and/or a RES Compliance Plan as referenced in 4 CSR 240-20.100(8).

RESPONSE: Subject to all objections, the Company states that it is not engaged in and does not intend to be engaged in the generation or the purchase of electricity generated from renewable energy resources for retail distribution and sale which is the subject of 4 CSR 240-20.100

(Electric Utility Renewable Energy Standard Requirements). Once the Company begins operations, it will not offer retail service in Missouri and will be regulated as an interstate, transmission-only company by FERC under the Federal Power Act. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G18: Please provide a copy of the most recent Report and the most recent Plan as referenced in the preceding item which were filed by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G17.

G19: Please list the years in which GBE, GBE Holding or Clean Line compiled the document referred to in 4 CSR 240-22.040(2).

RESPONSE: Subject to all objections, the Company states that 4 CSR 240-22.040 (Supply-Side Resource Analysis) is a section of the Commission's Electric Utility Resource Planning regulation, otherwise known as the Integrated Resource Planning (IRP) Rule, that applies only to electric utilities who have Missouri retail electric customers. See 4 CSR 240-22.080(1). The Company has not engaged in such sales and does not intend to engage in such sales. Once the Company begins operations, it will not offer retail service in Missouri and will be regulated as an interstate, transmission-only company by FERC under the Federal Power Act. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G20: Please provide a copy of the most recent document referenced in the preceding item which was compiled by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G19.

G21: Please list the years in which GBE, GBE Holding or Clean Line compiled the document referred to in 4 CSR 240-22.050(2).

RESPONSE: Subject to all objections, the Company states that 4 CSR 240-22.050 (Demand-Side Resource Analysis) is a section of the Commission's Electric Utility Resource Planning

regulation, otherwise known as the Integrated Resource Planning (“IRP”) Rule, that applies only to electric utilities who have Missouri retail electric customers. See 4 CSR 240-22.080(1). Once the Company begins operations, it will not offer retail service in Missouri and will be regulated as an interstate, transmission-only company by FERC under the Federal Power Act. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G22: Please provide a copy of the most recent document referenced in the preceding item which was compiled by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G21.

G23: Please provide the names of all “vegetation managers” employed by GBE, GBE Holding or Clean Line, as referenced in 4 CSR 240-23.030(2)(D), and the beginning and ending dates that each such employee was employed in that capacity.

RESPONSE: Subject to all objections, the Company states that it has not yet received a line CCN under Section 393.170.1 from the Commission permitting it to begin construction of electric plant. It has not requested an area CCN under Section 393.170.2 to serve the public, and does not intend to conduct retail distribution operations. Once the Company begins operations, it will comply with the requirements of 4 CSR 240-23.030 (Electrical Corporation Vegetation Management Standards and Reporting Requirements) applicable to transmission line operations. Given that the referenced rule does not apply to the Company at this time, it has not hired such employees.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G24: Please list the years in which GBE, GBE Holding or Clean Line filed the triennial compliance filing referenced in 4 CSR 240-22.080(1) and (14), or in lieu thereof, the years in which any of those entities applied for a waiver under subsection (14).

RESPONSE: Subject to all objections, the Company states that 4 CSR 240-22.080 is a section of the Commission’s Electric Utility Resource Planning regulation, otherwise known as the IRP Rule, that applies only to electric utilities who have Missouri retail electric customers. See 4 CSR 240-22.080(1). Once the Company begins operations, it will not offer retail service in

Missouri and will be regulated as an interstate, transmission-only company by FERC under the Federal Power Act. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G25: Please provide a copy of the most recent compliance filing or application for a waiver as referenced in the preceding item which was submitted by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G24.

G26: Please list the years in which GBE, GBE Holding or Clean Line developed the alternative resource plan referenced at 4 CSR 240.22.060(1).

RESPONSE: Subject to all objections, the Company states that 4 CSR 240-22.060 (Integrated Resource Plan and Risk Analysis) is a section of the Commission's Electric Utility Resource Planning regulation, otherwise known as the IRP Rule, that applies only to electric utilities who have Missouri retail electric customers. See 4 CSR 240-22.080(1). Once the Company begins operations, it will not offer retail service in Missouri and will be regulated as an interstate, transmission-only company by FERC under the Federal Power Act. Given that the referenced rule does not apply to the Company, it has not made such a filing.

GBE Holding and Clean Line are not subject to the requirements of the referenced rule.

G27: Please provide a copy of the most recent plan referenced in the preceding item which was developed by GBE, GBE Holding or Clean Line.

RESPONSE: Subject to all objections, see the response to G26.

G28: If GBE, GBE Holding or Clean Line received a waiver, variance or exemption from the Commission for any of the filings or other matters referenced in G1 to G27, please provide copies of all such waivers, variances and exemptions.

RESPONSE: Subject to all objections, the Company states that the majority of the filings and other matters referred to in G1 through G27 are not applicable to the Grain Belt Express Project and its planned operations. The Company has not yet received a line CCN under Section 393.170.1 from the Commission permitting it to begin construction of electric plant. It has not requested an area CCN under Section 393.170.2 to serve the public and does not intend to conduct retail operations. Further, in its CCN application currently pending before the Commission, the Company has sought a waiver of the annual reporting requirement of 4 CSR 240-3.165, now found at 10.145, as well as other regulations, including 4 CSR 240-3.145, 4 CSR 240-3.165, 4 CSR 240-3.175, and 3.190(1), (2) and (3)(A)-(D), pursuant to 4 CSR 240-2.060(4)(B). The Company has agreed to file with the Commission the annual report that it files with FERC after it begins operations. See Responses to G1-27. Given that the referenced rules do not yet apply or will not apply to the Company and the CCN proceeding is still pending, it has not yet received such waiver, variance, or exemption.

GBE Holding and Clean Line are not subject to the requirements of the referenced rules.

Responses by: Hans Detweiler

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid, this 20th day of March 2019.

/s/ Karl Zobrist
Attorney For Grain Belt Express Clean Line LLC

VERIFICATION OF RESPONSE

The answers provided to the foregoing Data Requests have been collected from various sources at Clean Line Energy Partners LLC and Grain Belt Express Clean Line LLC, and are true and accurate to the best of my knowledge and belief.



Signed: _____

Hans Detweiler
Corporate Representative
Clean Line Energy Partners LLC
Date: March 20, 2019