

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

Psc Staff Exhibit No. 205
Date 3-21-17 Reporter KJB
File No. EA-2016-0358

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) Case No. EA-2016-0358
Transmission Line and an Associated Converter)
Station Providing an Interconnection on the)
Maywood-Montgomery 345 kV transmission line.)

**GRAIN BELT EXPRESS RESPONSE TO
ROCKIES EXPRESS PIPELINE LLC'S FIRST SET
OF DATA REQUESTS TO GRAIN BELT EXPRESS CLEAN LINE LLC**

Grain Belt Express Clean Line LLC ("GBX") states the following in response to the data requests propounded by Rockies Express Pipeline LLC ("REX"):

1. GBX's application and the testimony and schedules filed in support propose preferred and alternative routes for GBX's high voltage, direct current electric transmission line and associated converter station (the "HVDC Project") that may involve multiple crossings of, and run parallel to, REX's existing high pressure natural gas pipeline (the "Pipeline"). None of said filings address the potential impacts of GBX's HVDC Project on REX's Pipeline, however. It is REX's position that it is not permissible to design, construct or operate GBX's HVDC line in a manner that would pose a risk to the safety or integrity of REX's pipeline. Does GBX support REX's position?

RESPONSE: Yes.

2. REX intends to study the potential impacts of the HVDC Project on the Pipeline. However, the testimony of GBX's witnesses, Anthony Wayne Galli and Thomas F. Shiflett, and the schedules attached thereto, indicate that the design and engineering of the HVDC project is still in a preliminary state. If comprehensive engineering and design work for the HVDC Project have yet to commence, please answer the following:

a) At what identifiable stage or step during the HVDC Project engineering and design work processes does GBX believe that potential impacts of the HVDC Project to the Pipeline may be determined?

RESPONSE: The appropriate time to begin studies would be after the final route alignment and structure spotting exercises are completed. Once a route is approved, significant engineering activities will begin on an engineering commencement date to determine structure locations. At that time enough detail will be available to perform the studies to determine if any mitigation measures will be necessary.

- b) Does GBX intend to give REX prompt, advance notice that the stage or step identified in GBX's answer to the immediately preceding question is about to commence?

RESPONSE: Yes.

- c) REX anticipates that it will need technical information about the HVDC Project, as well as information about how GBX intends to operate the HVDC Project, in order for REX to study how the HVDC Project might impact the safety or integrity of the Pipeline. Does GBX intend to share such technical and operational information as REX may reasonably request for this purpose? If GBX's answer is conditional, please state GBX's conditions.

RESPONSE: Yes, subject to the execution of confidentiality agreements to protect such information.

- d) If GBX's answers to questions b) and c) are in the affirmative, will GBX collaborate with REX to study how the HVDC Project might impact the safety or integrity of the Pipeline? If GBX's answer is conditional, please state GBX's conditions.

RESPONSE: Yes.

3. After studying the HVDC Project, REX's pipeline safety engineers may determine that monitoring, testing and/or mitigation steps are required in order to safeguard the Pipeline from potential adverse effects of the HVDC Project. Does GBX agree that in such event, GBX should be responsible for the costs of installing and operating such monitoring and testing equipment and mitigation measures? If GBX's answer is conditional, please state GBX's conditions.

RESPONSE: Yes, GBX should be responsible for all such costs warranted by reasonable engineering and commercial practices.

4. State whether GBX would be responsible for all direct damages to REX proximately caused by construction and/or ongoing operation of the HVDC Project, including direct damages from fault currents.

RESPONSE: Yes, GBX would be responsible.

VERIFICATION OF RESPONSE

The answers provided to this Set of 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:  _____

Position: GENERAL COUNSEL

Clean Line Energy Partners LLC

Date: 12/16/17