

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

MOTION TO INTERVENE OF SIERRA CLUB

COMES NOW Sierra Club, pursuant to the Commission’s September 1, 2022 Order Directing Notice, Setting Intervention Deadline, Setting Time for Responses and Directing Filing, and 20 CSR 4240-2.075, and for its Motion to Intervene, states as follows:

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 800,000 members nationally and nearly 11,000 members in Missouri, many of whom could benefit from the low-cost, wind-generated energy generated from the Grain Belt Express LLC transmission project (the “Project”). The Missouri Chapter of Sierra Club’s mailing address is P.O. Box 432010, St. Louis, MO 63143; email Missouri.chapter@sierraclub.org; telephone 314-644-1011.

2. Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club has long advocated for investment in clean, low-cost energy resources in the State of Missouri and across the country. Sierra Club is interested in promoting wind energy as an alternative to fossil fuel generation.

3. Sierra Club has substantial knowledge and experience related to the logistics of the Project. In fact, Sierra Club was a party in related Files No. EA-2016-0358 and EA-2014-0207, wherein it supported Grain Belt Express’ applications.

4. Sierra Club provides a unique perspective, as its interests in protecting the environment and promoting wind-generated energy are different from those of the general public. Sierra Club generally seeks to move away from fossil-fueled electricity towards renewable sources of energy in order to reduce pollution and ameliorate the adverse effects of fossil energy on the climate. Sierra Club's interests would be positively affected by the increased transmission of wind energy to load centers in Missouri and also to the eastern service territories. On the other hand, Sierra Club's interests could be adversely affected if the transmission line harms sensitive lands, waters, or species.

5. While Sierra Club generally supports the proposed expansion of the Project in order to add an additional 2,000 megawatts of wind-generated energy to the State of Missouri, Sierra Club is not yet certain of the positions it will take in this case.

6. It will serve the public interest for the Commission to grant this application to intervene.

7. Correspondence, communications, orders and decisions may be sent to:

Sarah Rubenstein (MO Bar #48874)
Madeline Semanisin (MO Bar #72936)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
srubenstein@greatriverslaw.org
madeline@greatriverslaw.org

WHEREFORE, Sierra Club respectfully requests the Public Service Commission grant this Motion to Intervene.

Respectfully Submitted,

/s/ Sarah Rubenstein

Sarah Rubenstein (MO Bar #48874)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
srubenstein@greatriverslaw.org

/s/ Madeline Semanisin

Madeline Semanisin (MO Bar #72936)
Great Rivers Environmental Law Center
319 N. 4th St., Suite 800
St. Louis, Missouri 63102
(314) 231-4181
madeline@greatriverslaw.org

Counsel for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September, 2022, a true and correct copy of the foregoing pleading was filed on EFIS and sent by email to all counsel of record.

/s/ Madeline Semanisin

Madeline Semanisin