BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Grain **Belt Express Clean Line LLC for Certificate**) of Convenience and Necessity Authorizing it) to Construct, Own, Operate, Control,) Manage and Maintain a High Voltage,) Direct Current Transmission Line and an) Associated Converter Station Providing an) Interconnection the Maywoodon) Montgomery 345 kV transmission line.)

Case No. EA-2014-0207

GRAIN BELT EXPRESS CLEAN LINE LLC RECOMMENDATION FOR LOCAL PUBLIC HEARINGS

Applicant Grain Belt Express Clean Line LLC ("Grain Belt Express" or "Company") states to the Commission:

1. Grain Belt Express proposes that the Commission schedule local public hearings at three sites at both Noon and 6 p.m. on the day selected. Based upon the community outreach efforts that the Company has conducted in various open houses and roundtables since 2011, it

recommends the following locations:

a. Eastern Missouri:

Paris High School 25686 Business Highway 24 Paris, Monroe County, Missouri 65275

b. Central Missouri:

Brunswick Junior and Senior High School 1008 County Road Brunswick, Chariton County, Missouri 65236

c. Western Missouri:

Plattsburg High School 800 Frost Street Plattsburg, Clinton County, Missouri 64477 2. Grain Belt Express proposes that six local public hearings be conducted at these three sites between July 21 and August 8, 2014. Holding the hearings at two different times in each location will provide flexibility to accommodate work schedules and other responsibilities.

3. The Company has also been advised that this proposal is supported by the following parties to this case: Wind on the Wires, The Wind Coalition, Infinity Wind, LLC, IBEW Local Unions 2, 53, 1439, and TradeWind Energy, Inc.

4. This recommendation of three sites for six local public hearings is consistent with other orders that the Commission has recently issued. For example, in the Noranda complaint cases, the Commission ordered three local public hearings, even though Ameren Missouri provides service in 60 Missouri counties and the City of St. Louis. <u>See</u> Order Setting Local Public Hearings and Directing Notice, <u>Noranda Aluminum Inc. v. Union Electric Co.</u>, No. EC-2014-0223 (May 14, 2014). Similarly, in the natural gas rate case filed by Liberty Utilities, which provides service in 25 Missouri counties, the Commission ordered five public hearings. <u>See</u> Order Setting Local Public Hearings, <u>In re Liberty Utilities (Midstates Natural Gas) Corp.</u>, No. GR-2014-0152 (April 30, 2014).

5. In this case, Grain Belt Express proposes to build an approximately 206-mile transmission line that will cross eight Missouri counties: Buchanan, Clinton, Caldwell, Carroll, Chariton, Randolph, Monroe and Ralls. It is therefore reasonable to conduct a total of six local public hearings at three sites in three counties located in the eastern, central and western areas of the state.

6. Such an order would be consistent with the Commission's action in the Callaway-Franks transmission line case, where only one local public hearing was conducted in Linn in Osage County, although the line traversed three counties (Osage, Maries and Pulaski). <u>See</u> Report and Order at 2-3, <u>In re Union Electric Co. Application for Authority to Construct</u> <u>Callaway-Franks Line</u>, No. ER-2002-351 (Aug. 21, 2003).

7. This case does not involve retail rates, rate design, or affiliate transactions with an incumbent Missouri public utility. The issues in this case are well defined by Commission precedent and judicial decisions regarding the issuance of a certificate of convenience and necessity. This proceeding does not involve complicated issues relating to cost recovery from ratepayers because Grain Belt Express will employ a participant-funded merchant transmission model where "shippers" who contract for energy and/or capacity will pay the rates, not retail ratepayers. This case also does not involve the interpretation of recently enacted statutes or newly promulgated regulations related to issues like fuel adjustment clauses, appeals of rate cases, renewable resources, energy efficiency or demand response.

8. Given these factors, scheduling local public hearings at three sites, with two hearings at each site, along the 206-mile proposed route is a reasonable recommendation that will allow for any interested member of the public to express his or her views to the Commission.

WHEREFORE, Grain Belt Express Clean Line LLC recommends that the Commission schedule six local public hearings to occur between July 21 and August 8, 2014 at the three sites located, respectively, in eastern, central and western Missouri.

Respectfully submitted,

/s/ Karl Zobrist

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties of record this 5th day of June, 2014:

/s/ Karl Zobrist