BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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 Transmission Line and an Associated Converter Station Providing an interconnection on the Maywood - Montgomery 345 kV Transmission Line	)	**Case No. EA-2014-0207**

MOTION TO ACCEPT CORRECTION TO PREFILED TESTIMONY

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and hereby files its *Motion to Accept Correction to Prefiled Testimony* regarding the prefiled rebuttal testimony of Staff witness Sarah Kliethermes, stating:

1. It has come to Staff's attention that there is an error on page 16 of Staff witness Sarah L. Kliethermes' prefiled rebuttal testimony appearing on lines 7-10.

2. Staff has corrected this error and with this *Motion* seeks leave to file a corrected version and redlined version of page 16 of Staff witness Sarah L. Kliethermes' prefiled rebuttal testimony.

3. The corrections in no way alter the conclusions made in Staff witness Sarah L. Kliethermes' prefiled rebuttal testimony.

WHEREFORE, Staff requests the Commission accept its *Motion to Accept Correction to Prefiled Testimony.*

GBE Exhibit No. 145
Date 11-21-14 Reporter KF
File No. EA-2014-0207

/s/ Alexander Antal
Alexander Antal
Assistant Staff Counsel
Missouri Bar No. 65487

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4140 (Telephone)
(573) 751-9285 (Fax)
amy.moore@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 26th day of September, 2014.

/s/ Alexander Antal

the wind is blowing, and would increase by $904,335 in hours when the wind is not blowing.[20] This further demonstrates that there is great uncertainty related to the Project and the impact on Missouri's regulated utilities and retail ratepayers.

Q. What is the impact of the Missouri converter station on the LMP components at Palmyra, if run in isolation from the Illinois/Indiana converter station, as compared to Grain Belt Express's modeled LMP without the Project?

A. Running only the Missouri converter station in isolation increases the magnitude of the congestion and loss ~~all LMP~~ components at Palmyra by approximately $1,210,000, ~~on both total and per-MWh basis~~and reduces the magnitude of the energy LMP component by approximately $240,000.

500 MW Mo Injection Totals				
	Full LMP	Energy	Congestion	Losses
No Project:	$ 67,801,252	$ 73,444,899	$ (83,578)	$ (5,560,069)
Total Project:	$ 65,847,132	$ 73,189,783	$(993,379)	$ (6,349,273)
Mo 500 only:	$ ~~73,202,517~~ 66,347,858	$ ~~80,057,177~~ 73,202,517	$(570,789)	$ (6,283,871)
500 @ MO 1000 only:	$ ~~72,955,497~~ 64,887,464	$ ~~81,023,530~~ 72,955,497	$(1,068,467)	$ (6,999,566)

500 MW Mo Injection per Injected MWh				
	Full LMP	Energy	Congestion	Losses
No Project:	$ 32.16	$ 34.84	$ (0.04)	$ (2.64)
Total Project:	$ 31.23	$ 34.71	$ (0.47)	$ (3.01)
Mo 500 only:	$ ~~34.72~~ 31.47	$ ~~37.97~~ 34.72	$ (0.27)	$ (2.98)
500 @ MO 1000 only:	$ ~~34.60~~ 30.78	$ ~~38.43~~ 34.60	$ (0.51)	$ (3.32)

Q. Which converter station has the greater impact on the energy component of the LMP at Palmyra that was modeled by Grain Belt Express?

[20] Hours in which 100MW of wind was delivered to the Missouri converter station was used for determining whether the wind was blowing or not blowing. Using, for example, 20MW of Missouri wind delivery resulting in $7,176,225, and $121,025, respectively. Looking only at hours when 400MW or more of wind is delivered to the Missouri converter station results in a decrease of $4,116,816 during wind hours, and an increase of $2,938,414 during non-wind hours.

the wind is blowing, and would increase by $904,335 in hours when the wind is not blowing.[20] This further demonstrates that there is great uncertainty related to the Project and the impact on Missouri's regulated utilities and retail ratepayers.

Q. What is the impact of the Missouri converter station on the LMP components at Palmyra, if run in isolation from the Illinois/Indiana converter station, as compared to Grain Belt Express's modeled LMP without the Project?

A. Running only the Missouri converter station in isolation increases the magnitude of the congestion and loss components at Palmyra by approximately $1,210,000, and reduces the magnitude of the energy LMP component by approximately $240,000.

500 MW Mo Injection Totals				
	Full LMP	Energy	Congestion	Losses
No Project:	$ 67,801,252	$ 73,444,899	$ (83,578)	$ (5,560,069)
Total Project:	$ 65,847,132	$ 73,189,783	$(993,379)	$ (6,349,273)
Mo 500 only:	$ 66,347,858	$ 73,202,517	$(570,789)	$ (6,283,871)
500 @ MO 1000 only:	$ 64,887,464	$ 72,955,497	$(1,068,467)	$ (6,999,566)

500 MW Mo Injection per Injected MWh				
	Full LMP	Energy	Congestion	Losses
No Project:	$ 32.16	$ 34.84	$ (0.04)	$ (2.64)
Total Project:	$ 31.23	$ 34.71	$ (0.47)	$ (3.01)
Mo 500 only:	$ 31.47	$ 34.72	$ (0.27)	$ (2.98)
500 @ MO 1000 only:	$ 30.78	$ 34.60	$ (0.51)	$ (3.32)

Q. Which converter station has the greater impact on the energy component of the LMP at Palmyra that was modeled by Grain Belt Express?

A. Assuming no congestion, whichever converter station is delivering more energy in a given hour will have the greater impact on the energy component of the LMP. The energy component is the same at every node in MISO at a given interval. Additionally,

[20] Hours in which 100MW of wind was delivered to the Missouri converter station was used for determining whether the wind was blowing or not blowing. Using, for example, 20MW of Missouri wind delivery resulting in $7,176,225, and $121,025, respectively. Looking only at hours when 400MW or more of wind is delivered to the Missouri converter station results in a decrease of $4,116,816 during wind hours, and an increase of $2,938,414 during non-wind hours.