

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

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**RENEW MISSOURI'S POST-HEARING BRIEF**

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COMES NOW Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), and presents this *Post-Hearing Brief* to the Missouri Public Service Commission (“PSC” or the “Commission”):

**I. Introduction**

In its 2019 *Report and Order on Remand*, the Commission granted Grain Belt Express Clean Line LLC – now Grain Belt Express LLC (“Grain Belt”) a Certificate of Convenience and Necessity (“CCN”) to construct an approximately 780-mile, high voltage, direct current (“HVDC”) transmission line that would bring 500 MW of clean energy from western Kansas into Missouri (the “Certificated Project”).

After several years of developing the Certificated Project, Grain Belt now proposes an amendment to its CCN allowing it to deliver five times the clean energy originally contemplated into points of interconnection in Missouri (the “Amended Project”). Substantial evidence presented through written testimony and at hearing indicates that this massive infusion of clean, low-cost energy into the Midcontinent Independent System Operator (MISO) market will benefit Missourians through downward pressure on rates, increased grid reliability and resiliency, and the health and environmental benefits of displacing fossil fuel generation with renewables. These benefits, coupled with Grain Belt’s efforts to incorporate feedback from landowners into the

development of the Amended Project, ensure that Missouri will achieve maximum benefit from the construction of this line.

## II. Discussion

***Issue 1(A) and (B): The Commission should find that the proposed amendments are necessary and/or convenient for the public service.***

The Commission may grant an electrical corporation a CCN after determining that construction and operation is “necessary or convenient for the public service.”<sup>1</sup> The Missouri Court of Appeals has explained that when applying that standard “[t]he term ‘necessity’ does not mean ‘essential’ or ‘absolutely indispensable’, but that an additional service would be an improvement justifying its cost.”<sup>2</sup>

When evaluating applications, the Commission has traditionally considered five factors:

- 1) There must be a need for the service;
- 2) The applicant must be qualified to provide the proposed service;
- 3) The applicant must have the financial ability to provide the service;
- 4) The applicant’s proposal must be economically feasible; and
- 5) The service must promote the public interest.<sup>3</sup>

As the Commission has previously found that Grain Belt has the qualifications and financial ability to provide the proposed service, this brief will only address the *need, economic feasibility, and public interest* criteria.

### The Amended Project is Needed

In determining need for the Certificated Project, the Commission relied largely on Grain Belt’s contract with the Missouri Joint Municipal Electric Utility Commission, now doing business

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<sup>1</sup> Section 393.170.3, RSMo.

<sup>2</sup> *State ex rel. Intercon Gas, Inc. v. Pub. Serv. Comm’n*, 848 S.W.2d 593, 597 (Mo. App. W.D. 1993).

<sup>3</sup> *In re Tartan Energy Company*, 3 Mo.P.S.C. 173, 177 (1994).

as the Missouri Electric Commission (“MEC”). The Commission cited substantial cost savings to MEC members that would be passed through to residential and industrial customers in the form of rate relief or through deferred maintenance to electrical distribution systems.<sup>4</sup> The Commission also considered need for the Certificated Project in a more regional context, stating, “[c]learly, there is a demonstrable need for the service the Grain belt Project offered both in Missouri and in the regions that affect Missouri energy markets.”<sup>5</sup>

As in the 2016 case, the contract between MEC and Grain Belt remains in place.<sup>6</sup> In fact, MEC witnesses testified that demand for renewable energy amongst its members remains unmet,<sup>7</sup> with MEC witness John Twitty testifying, “I expect additional MEC pools and/or member cities to be interested in purchasing additional power over the Grain Belt Amended Project, which I understand will provide five times the renewable energy of the original, now Certificated Project.”<sup>8</sup> Mr. Twitty further noted the unique ability of the Amended Project to deliver competitively-priced renewable energy so that MEC’s wholesale customers may continue their successful renewable programs. Moreover, MEC’s witnesses speak to the broader benefits the Amended Project will deliver to Missouri utilities and ratepayers in the form of lowered marginal energy costs for the entire MISO footprint.<sup>9</sup> For MEC’s members in particular, this will result in savings through lower locational marginal prices at the nodes where members buy power.<sup>10</sup>

Demand for the Amended Project is further evidenced by Grain Belt’s executed Memorandums of Understanding (“MOUs”) with major commercial and industrial consumers and

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<sup>4</sup> EFIS File No. EA-2016-0358, Doc. No. 758: *Report and Order on Remand*, p. 41.

<sup>5</sup> *Id.* at 42.

<sup>6</sup> EFIS File No. EA-2023-0017, Doc. No. 132: *Rebuttal Testimony of John Grotzinger*, p. 4.

<sup>7</sup> *Id.* at 8.

<sup>8</sup> EFIS File No. EA-2023-0017, Doc. No. 130: *Rebuttal Testimony of John Twitty*, p. 7-8.

<sup>9</sup> EFIS File No. EA-2023-0017, Doc. No. 128: *Rebuttal Testimony of Rebecca Atkins*, p. 3.

<sup>10</sup> *Id.*

electric utilities.<sup>11</sup> Grain Belt witness Shashank Sane provides further clarification that the customers that entered these MOUs continue to express interest and demonstrate demand for the transmission of the renewable energy that will be transported by the Amended Project.<sup>12</sup> Mr. Sane further notes that, “While MOUs establish a baseline understanding at the outset of commercial decisions, as those discussions mature, the focus of the parties shift to negotiating binding agreements and there is no need to extend the effect date of the MOUs.”<sup>13</sup>

Grain Belt also cites the aggressive emissions reductions goals outlined in the Integrated Resource Plan (“IRP”) filings of Missouri’s largest electric Investor-Owned Utilities, Ameren Missouri and Evergy.<sup>14</sup> Staff argues that these IRP filings are not relevant because the utilities’ Preferred Resource Plans do not affirmatively state an intention to purchase energy from the Amended Project. However, the Amended Project will unlock access to a great deal of untapped, high-capacity factor wind resources at the exact time Missouri utilities are seeking to implement an aggressive shift away from fossil fuel generation. Grain Belt witness Robert Baker notes that, regardless of a requirement for utilities to procure capacity from the Amended Project, utilities and ISO’s have historically always sought to extract maximum value from similar projects.<sup>15</sup> In fact, Mr. Sane points out that the Amended Project is the exact solution Evergy described as needed to procure the attractive wind resources in the southwest Kansas region in its 2021 IRP.<sup>16</sup> This is consistent with Ameren Missouri’s analysis, which indicated that a scenario including a 1000 MW

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<sup>11</sup> EFIS File No. EA-2023-0017, Doc. No. 10: *Application to Amend CCN*, p. 21; EFIS File No. EA-2023-0017, Doc. No. 11: *Direct Testimony of Shashank Sane*, p. 13.

<sup>12</sup> EFIS File No. EA-2023-0017, Doc. No. 163: *Surrebuttal Testimony of Shashank Sane*, p. 15.

<sup>13</sup> *Id.*

<sup>14</sup> *Id.* at 13-14.

<sup>15</sup> EFIS File No. EA-2023-0017, Doc. No. 169: *Surrebuttal Testimony of Robert Baker*, p. 7.

<sup>16</sup> *Surrebuttal of Shashank Sane* at 5-6.

purchase from the Grain Belt Express line would offer a comparatively low cost to the Preferred Plan, but at the time lacked the regulatory certainty that has now been achieved.<sup>17</sup>

From a more regional perspective, multiple experts have underscored the Amended Project's ability to provide needed reliability and resiliency benefits to the grid. Sierra Club witness Michael Milligan testified that the Amended Project would increase system resilience by linking together disparate areas, both geographically and through grid regions, making the "grid larger than the storm" in cases of severe weather.<sup>18</sup> Clean Grid Alliance Michael Goggin provides substantial analysis as to the resilience benefits the Amended Project could have provided during Winter Storm Elliott, and provides further support for the conclusions of Grain Belt witness Mark Repsher in the PA Consulting Report that describe the value interregional transmission would have provided in recent instances of severe weather.<sup>19</sup> Mr. Milligan testifies that the same regional linkages that provide resiliency benefits provide reliability benefits through the enhanced ability to respond to disturbances, stronger connections to neighboring areas, and more coordinated economic dispatch response in recovering from disturbances.<sup>20</sup> He further notes that loss of load expectation studies have confirmed that interregional transmission, such as the Amended Project, can reduce the installed capacity requirements in a grid system, thereby enhancing coordination of resource planning across regions and mitigating the potential for additional costs in the form of excess resources.<sup>21</sup>

Taken together, the evidence presented through written testimony and at hearing indicates that there is a need for the Amended Project in Missouri. The MEC contract the Commission

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<sup>17</sup> *Id.* at 4; EFIS File No. EA-2023-0017, Doc. No. 135: *Rebuttal Testimony of Michael Goggin*, p. 24.

<sup>18</sup> EFIS File No. EA-2023-0017, Doc. No. 129: *Rebuttal Testimony of Michael Milligan*, p. 19.

<sup>19</sup> *Rebuttal Testimony of Michael Goggin* and Schedule MG-9. *See also* EFIS File No. EA-2023-0017, Doc. No. 19: *Direct Testimony of Mark Repsher* and Schedule MR-2.

<sup>20</sup> *Rebuttal Testimony of Michael Milligan* at 15.

<sup>21</sup> *Id.* at 15-16.

considered in the 2016 case remains active and updated, with MEC witnesses testifying to additional demand expected from members. Moreover, Grain Belt has executed MOUs with commercial and industrial consumers, as well as electric utilities, that remain actively interested in procuring energy from the Amended Project. As Grain Belt and Clean Grid Alliance witnesses have illustrated, the Amended Project will provide an influx of cost-effective and reliable renewable energy into Missouri, creating a viable and competitive option for Missouri utilities implementing the shift away from carbon-intensive resources. This high level of demand, coupled with the need for increased grid reliability and resiliency in the face of more frequent severe weather events, demonstrates a clear need for the Amended Project.<sup>22</sup>

#### The Amended Project is Economically Feasible

In its *Report and Order on Remand*, the Commission concluded that the Certificated Project was economically feasible due to its unique ability to link low-cost wind energy with centers of demand in Missouri.<sup>23</sup> The Commission also cited the demand for the Certificated Project in the higher-priced Pennsylvania-New Jersey-Maryland Interconnection (PJM) market and several other factors including the continually lowering cost of generating wind in Kansas, higher wind speeds in Kansas as compared to Missouri and other midwestern states, Kansas state tax incentives and low construction costs, and technological improvements mitigating industry dependence on tax credits.<sup>24</sup>

As with the Certificated Project, the Amended Project will connect the growing demand for clean energy in Missouri with Kansas renewable resources that enjoy higher capacity factors,

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<sup>22</sup> This conclusion is consistent with Staff's analysis, which determined that the Amended Project is needed in Missouri. See EFIS File No. EA-2023-0017, Doc. No. 145: *Rebuttal Testimony of Shawn Lange*, p. 16.

<sup>23</sup> EFIS File No. EA-2016-0358, Doc. No. 758: *Report and Order on Remand*, p. 43.

<sup>24</sup> *Id.* at 44.



directly translating into lower electricity costs for customers.<sup>25</sup> Moreover, the production tax credit provisions of the Inflation Reduction Act ensure that these high-producing wind and solar resources can offer more competitive options for power purchase agreements than lower-capacity, in-state resources.<sup>26</sup> While the Commission looked largely to demand within PJM to determine the financial viability of the Certificated Project, the Amended Project delivers substantially more energy into points of interconnection in Missouri. Grain Belt has entered into MOUs with parties, beyond the existing contract with MEC, with pricing that incorporates the current projected cost of the Amended Project.<sup>27</sup> As Mr. Sane explains in his surrebuttal testimony, the 2,300 MW not contracted to MEC will be sold at rates allowing for a reasonable rate of return.<sup>28</sup>

The Amended Project offers the state increased access to geographically diverse, high quality renewable resources at a time when Missouri businesses and utilities are implementing a rapid shift away from fossil fuel resources. Grain Belt has provided evidence speaking to the demand for the Amended Project at a rate that will allow a reasonable recovery of costs, all while renewable resources continue to become more competitive with the passage of the Inflation Reduction Act. Together, these factors should lead to a Commission determination that the Amended Project is economically feasible.

#### The Amended Project Serves the Public Interest

Precedent is clear that, “(t)he Commission’s powers to regulate in the public interest ‘are broad and comprehensive’ and include the authority ‘to order improvements[,]’” (*In the Matter of Application of KCP&L Greater Missouri Operations Company*, 515 S.W.3d 754, 760 (Mo. App. W.D. 2016) (citing *Stopaquila.Org v. Aquila, Inc.*, 180 S.W.3d 24, 34-35 (Mo. App. W.D. 2005)),

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<sup>25</sup> *Rebuttal Testimony of Michael Goggin* at 5.

<sup>26</sup> *Id.*

<sup>27</sup> *Direct Testimony of Shashank Sane* at 31.

<sup>28</sup> EFIS File No. EA-2023-0017, Doc. No. 163: *Surrebuttal Testimony of Shashank Sane*, p. 16.

and that the public interest is a matter of policy to be determined by the Commission. *State ex rel. Public Water Supply District v. Public Service Commission*, 600 S.W.2d 147, 154 (Mo. App. 1980). Moreover, “It is within the discretion of the (Commission) to determine when the evidence indicates the public interest would be served.” (Case No. EA-2016-0208, *Report and Order* pp. 18-19)(citing *State ex rel. Intercon Gas, Inc. v. Public Service Com'n of Missouri*, 848 S.W.2d 593, 597-598 (Mo. App. 1993)). The Commission has held that determining the public interest is a balancing process, and that the total interests of the public served must be assessed. *In the Matter of Sho-Me Power Electric Cooperative’s Conversion from a Chapter 351 Corporation to a Chapter 394 Rural Electric Cooperative*, EFIS File No. EO-93-0259, 1993 WL 719871 (Mo. P.S.C.).

The Commission has consistently recognized the deployment of renewable energy in Missouri and its associated benefits to the state as serving the public interest. Previously, the Commission has concluded that, “... customers and the general public have a strong interest in the development of economical renewable energy sources to provide safe, reliable, and affordable service while improving the environment and reducing the amount of carbon dioxide released into the atmosphere.”<sup>29</sup> Similarly, the Commission has previously concluded, “[i]t is the public policy of this state to diversify the energy supply through the support of renewable and alternative energy sources. The Commission has also previously expressed its general support for renewable energy generation because it provides benefits to the public.”<sup>30</sup> In File No. EO-2018-0092, the Commission recognized that, “Empire’s proposed acquisition of 600 MW of additional wind generation assets is clearly aligned with the public policy of the Commission and this state.”<sup>31</sup>

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<sup>29</sup> EFIS File No. EA-2016-0208, Doc. No. 126; EFIS File No. EA-2015-0256, Doc. No. 84.

<sup>30</sup> EFIS File No. EA-2019-0010, Doc. No. 168 *Report and Order*, p. 32 (citing Sections 393.1025 and 393.1030 [Renewable Energy Standard]; and Section 393.1075 [Missouri Energy Efficiency Investment Act]).

<sup>31</sup> EFIS File No. EO-2018-0092, Doc. No. 228 *Report and Order*, p. 20.

In granting the CCN for the Certificated Project, the Commission stated:<sup>32</sup>

There can be no debate that our energy future will require more diversity in energy resources, particularly renewable resources. We are witnessing a worldwide, long-term and comprehensive movement towards renewable energy in general and wind energy specifically. Wind energy provides great promise as a source for affordable, reliable, safe, and environmentally-friendly energy. The Grain Belt Project will facilitate this movement in Missouri, will thereby benefit Missouri citizens, and is, therefore, in the public interest.

The Commission has also evaluated the economic development benefits of renewable energy as a matter of public interest, finding in Liberty-Empire's 2019 CCN Application that wind generation helps Missouri corporations perform more competitively and acknowledging that corporate customers are increasingly seeking options for purchasing renewable power.<sup>33</sup> More recently, the Commission found that:<sup>34</sup>

Demand for clean, reliable, and affordable energy is an increasingly important factor in determining where businesses locate new jobs and investment. Missouri is competing with other states for new jobs and investment from businesses that have large energy demand and a need for renewable energy resources. Customer preferences for renewable energy and corporate sustainability goals by Missouri's large employers for their energy needs should not be dismissed.

The health, environmental, cost, and economic development benefits the Commission consistently recognizes are not only present, but provided in much greater scale by the Amended Project. Grain Belt witness Mark Repsher indicated that the Amended Project is projected to reduce emissions of CO<sub>2</sub>, SO<sub>2</sub>, and NO<sub>x</sub> in Missouri by 9.3%, 19.2 %, and 17.2%, respectively.<sup>35</sup> As Mr. Repsher's Report correctly points out, this reduction in emissions will lead to fewer instances of respiratory illness and distress – an impact of fossil fuel generation that disproportionately impacts communities of color.<sup>36</sup>

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<sup>32</sup> EFIS File No. EA-2016-0358, Doc. No. 758: *Report and Order on Remand*, p. 47.

<sup>33</sup> EFIS File No. EA-2019-0010, Doc. No. 168: *Report and Order*, p. 21.

<sup>34</sup> EFIS File No. EA-2022-0245, Doc. No. 150: *Report and Order*, p. 31.

<sup>35</sup> *Direct Testimony of Mark Repsher* at 6.

<sup>36</sup> *Id.* at Schedule MR-2, p. 14-15.

In addition, the Amended Project will deliver an influx of low-cost renewable energy into the MISO market, lowering prices across the entire MISO footprint. Clean Grid Alliance Michael Goggin testified that, “[t]he impact on energy and capacity market prices tends to be largest near the point at which additional supply is injected...,”<sup>37</sup> meaning that Missouri ratepayers will experience substantial benefits from the energy injected at points of interconnection in the state. Moreover, the Amended Project creates access to low-cost energy from which Missouri utilities can utilize power purchase agreements to pass savings on to ratepayers.<sup>38</sup> Importantly, the renewable resources (both solar and wind) delivered by the Amended Project have higher capacity factors than in-state renewable resources.<sup>39</sup> The Amended Project will reduce congestion, thereby unlocking the ability of these lower-cost, clean resources to reach demand in Missouri with fewer constraints.<sup>40</sup>

Finally, the Amended Project is projected to bring substantial economic development benefits to Missouri through providing Missouri businesses with access to the renewable energy needed to meet corporate sustainability goals – incentivizing business development within the state – and through overall impacts on job creation, wages, and economic output. MEC witness John Grotzinger testified that, “[w]e have observed that industrial retail customers of our wholesale customers are placing renewable energy goals in their corporate procurement policies. The Grain Belt project gives our cities the opportunity to meet those policies and remain or become attractive locations for those industries.”<sup>41</sup> This is consistent with recent growth in corporate and industrial customer demand across the state, addressed in depth in Ameren Missouri’s CCN application for

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<sup>37</sup> *Rebuttal Testimony of Michael Goggin* at 26.

<sup>38</sup> *Id.*

<sup>39</sup> *Direct Testimony of Mark Repsher* at 11.

<sup>40</sup> *Rebuttal Testimony of Michael Milligan* at 12.

<sup>41</sup> *Rebuttal Testimony of John Grotzinger* at 8.

the Boomtown solar facility and its associated Renewable Solutions Program.<sup>42</sup> Additionally, Grain Belt witness Dr. David Loomis projects substantial benefits in terms of worker earnings, economic output, and tax revenue and landowner payments, as well as job creation both during construction and long-term.<sup>43</sup>

The substantial health, environmental, cost, and economic development benefits of the Amended Project will accrue to Missouri ratepayers and the state as a whole over the life of the Project. These benefits, while the same in nature as those the Commission evaluated in its 2019 decision, will be amplified by the increased infusion of low-cost, clean energy into the state. These are the very benefits the Commission has consistently recognized as serving the public interest through the development of renewable energy. With this in mind, the Commission should find that the Amended Project is in the public interest.

***Issue 2: The Commission should approve a change in the Landowner Protocols to modify the compensation package offered to landowners along the Tiger Connector route.***

As discussed above, the Commission had broad discretion to regulate in the public interest. The Commission has previously stated, “[i]t is the Commission’s responsibility to balance the interests of all stakeholders, including affected landowner, to determine what is in the best interest of the general public as a whole.”<sup>44</sup> Ultimately, the Commission determined in 2019 that any negative impacts to landowners would be mitigated through a landowner protocol, superior compensation payments, and several other landowner protections.<sup>45</sup>

Following the Commission’s decision, House Bill 2005 was brought before the Missouri Legislature and ultimately passed after stakeholders provided feedback and negotiated acceptable

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<sup>42</sup> See EFIS File No. EA-2022-0245.

<sup>43</sup> EFIS File No. EA-2023-0017, Doc. No. 17: *Direct Testimony of David Loomis*, Schedule DL-2.

<sup>44</sup> EFIS File No. EA-2016-0358, Doc. No. 758: *Report and Order on Remand*, p. 47.

<sup>45</sup> *Id.* at 46.

terms. While the provisions of House Bill 2005 do not apply to Grain Belt's *Application to Amend*,<sup>46</sup> Grain Belt proposes a modification to the compensation package offered along the Tiger Connector route that incorporates the feedback of stakeholders regarding just compensation.<sup>47</sup> With this modification, landowners along the Tiger Connector route will receive payments of 150% of fair market value, as opposed to the 110% plus a one-time structure payment that was offered to landowners along the HVDC route.<sup>48</sup> At hearing, Grain Belt witness Kevin Chandler explained that even without structure payments, Grain Belt expects that to pay landowners more under the proposed 150% of fair market value compensation package.<sup>49</sup>

Grain Belt's efforts to incorporate landowner feedback into the development of compensation packages along the Tiger Connector route is a good faith effort to ensure that landowners are compensated in a manner that is most beneficial to them. This amendment to the Landowner Protocol should assist the Commission in balancing the interests of landowners with those of the general public. The increased compensation package, coupled with the continued use of the Landowner Protocols and other ordered landowner protections should lead to a Commission determination that any negative impacts of the Amended Project are sufficiently mitigated.

### **III. Conclusion**

In 2019, the Commission stated, "[t]here can be no debate that our energy future will require more diversity in energy resources, particularly renewable resources. We are witnessing a worldwide, long-term and comprehensive movement towards renewable energy in general and wind energy specifically."

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<sup>46</sup> See Section 523.039.2, RSMo. (stating that the relevant provision does not apply to applications filed pursuant to section 393.170 prior to August 28, 2022.)

<sup>47</sup> EFIS File No. EA-2023-0017, Doc. No. 21: *Direct Testimony of Kevin Chandler*, pg. 20.

<sup>48</sup> *Id.* at 16.

<sup>49</sup> EFIS File No. EA-2023-0017, Doc. No. 210: *Transcript, Volume 10*, pg. 593.

The Amended Project will deliver up to 2,500 MW of low-cost, highly sought after renewable resources to points of interconnection in Missouri. This massive infusion of clean energy will put downward pressure on rates within the entire MISO footprint, will increase the reliability and resiliency of the grid, and will displace expensive fossil fuel generation by relieving congestion and unlocking access to cleaner resources, lowering emissions and positively impacting human health.

Grain Belt's *Application to Amend* comes at a time when Missouri businesses and utilities are seeking to shift away from fossil fuel generation to cleaner, cheaper renewable resources. Witnesses in this case have testified to demand within not only the largest utilities in the state, but also within the municipal utilities and cities that are competing for business and job growth. The Amended Project provides a unique ability to satisfy that growing demand with high-quality renewable resources, which have become even more competitive with the onset of the Inflation Reduction Act's tax credit provisions.

The Commission should approve the Amended Project, finding that it facilitates the movement towards renewable energy in Missouri, thereby benefits Missouri citizens, and is, therefore, in the public interest.

WHEREFORE, Renew Missouri submits this *Post-Hearing Brief*.

Respectfully,

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ATTORNEYS FOR RENEW  
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Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 7<sup>th</sup> day of July 2023:

**/s/ Alissa Greenwald**